

**Supporting Statement for VA Form 21P-535**  
**Application for Dependency and Indemnity Compensation by Parent(s)**  
**(Including Accrued Benefits and Death Compensation, When Applicable)**  
**(2900-0005)**

A. Justification

1. The Department of Veterans Affairs (VA), through its Veterans Benefits Administration (VBA), administers an integrated program of benefits and services established by law for veterans, service personnel, and their dependents and/or beneficiaries. 38 U.S.C. 1121 and 1310 provide for payment of Dependency and Indemnity Compensation (DIC) or death compensation to parents of veterans whose deaths are service connected. Parents must also meet income limitations for DIC and death compensation. 38 U.S.C. 5121 provides for payment of accrued benefits. Information is requested by this form under the authority of 38 U.S.C. 501(a)(2).
2. VA Form 21P-535 is used for the sole purpose of gathering the necessary information to determine a parent's eligibility, dependency and income, as applicable, for the death benefit sought.
3. VA Form 21P-535 is available on the One-VA Website in a fillable electronic format. VBA is currently hosting this form on a secure server and does not currently have the technology in place to allow for the complete submission of the form. Validation edits are performed to assure data integrity. Efforts within VA are underway to provide a mechanism to allow the information to be submitted electronically with a recognized signature technology. There currently is no utility process in place that will allow the data submitted on the form to be incorporated with an existing centralized legacy database.
4. Program reviews were conducted to identify potential areas of duplication; however, none were found to exist. There is no known Department or Agency which maintains the necessary information, nor is it available from other sources within our Department.
5. The collection of information does not involve small businesses or entities.
6. The VA compensation and pension programs require claimants to file an application for benefits subsequent to the death of the veteran to determine eligibility for the benefit. Without this information, entitlement to benefits could not be determined.
7. There is no special circumstance requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines.
8. The Department notice was published in the Federal Register on October 2, 2014, Volume 79, No. 191, pages 59558-59559.

On December 1, 2014, Mr. Gabriel Blau, the Executive Director of the Family Equality Council submitted a comment recommending that all instances of the words "mother" and "father" be replaced with the gender-neutral term "parent." VBA responded to the comment by updating the

language on the form, replacing all instances of “mother” and “father” with “parent” to better match the intent of 38 USC §103(c).

9. No payments or gifts to respondents have been made under this collection of information.

10. The records are maintained in the appropriate Privacy Act System of Records identified as 58VA21/22, "Compensation, Pension, Education and Rehabilitation Records - VA" found in 42 Fed. Reg. 49726 (9/27//1977) with the detailed listing to be found on p.49760, as set forth in Privacy Act Issuances, 1993 compilation.

11. There are no questions of a sensitive nature.

12. Estimate of Information Collection Burden.

a. Number of Respondents: 3,600

b. Frequency of Response: one time

c. Annual Burden Hours: 4,320

d. Estimated Completion Time: 1 hour 12 minutes based on review of VBA staff personnel and previous usage of the form.

e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24, making the total cost to the respondents an estimated \$103,680. (4,320 burden hours x \$24 per hour).

13. This submission does not involve any recordkeeping costs.

14. Estimated Costs to the Federal Government:

a. Processing/Analyzing costs \$405,086

(GS-12/5 @ \$37.89 x 3,600 x 72/60 minutes = \$163,645)

(GS- 9/5 @ \$26.13 x 3,600 x 154/60 minutes = \$241,441)

b. Printing and production cost \$420

c. Total cost to government \$405,506

15. The form is being transferred from Compensation Service (21) to Pension and Fiduciary Service (21P) due to a division of the business lines. The prefix has been changed from “21” to “21P” and the designations “mother” and “father” have been changed to “parent”. The expiration date placeholder has also been added to the form.

16. The information collection is not for publication or tabulation use.
17. We are not seeking approval to omit the expiration date for OMB approval.
18. This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

This collection of information does not employ statistical methods.