

Supporting Statement for:
(2900-0002)

VA Form 21P-527, *Income, Asset, and Employment Statement* (formerly *Income, Net Worth and Employment Statement*), and
VA Form 21P-527EZ, *Application for Veterans Pension* (formerly *Application for Pension Benefits*)

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. VA Form 21P-527EZ, *Application for Veterans Pension*, is the prescribed form for Veterans Pension claims under the fully developed claim (FDC) program. This form is required as part of the FDC Program Transformation Initiative. VA Form 21P-527, *Income, Asset, and Employment Statement* (formerly *Income, Net Worth and Employment Statement*) is a form used to gather necessary information to determine a veteran's entitlement to Veterans Pension. Veterans use this form to reopen a previously discontinued pension award to reinstate benefits. Information is requested in these forms under the authority of Chapter 15 of title 38, United States Code.
2. In RIN 2900-AO73, VA proposes to amend its pension regulations to maintain the integrity of its needs-based pension program. VA has authority under 38 U.S.C. 501(a) to prescribe all rules and regulations which are necessary or appropriate to carry out the laws administered by VA. VA would amend its information collections consistent with RIN 2900-AO73. This rulemaking is largely in response to a Government Accountability Office (GAO) report, GAO-12-50, *Veterans' Pension Benefits: Improvements Needed to Ensure only Qualified Veterans and Survivors Receive Benefits*.
3. GAO 12-50 recommended that VBA modify its pension application forms and recommended an up-front verification process. VA has authority under 38 U.S.C. 5317 to use information from the Social Security Administration (SSA) and the Internal Revenue Service (IRS) in an up-front verification process. VA would amend its information collections consistent with the GAO recommendations and an up-front verification process with the SSA and IRS. Up-front verification also aids in VA compliance with the Improper Payment Elimination and Recovery Act (IPERA), Public Law 112-248.
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. These forms were redesigned into a “user friendly” form, incorporating plain English, to comply with the President’s Memorandum of June 1, 1998, Plain Language in Government Writing.
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 XXXXXX at page XXXXXX. Comments/No comments were received.
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 “Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records-VA (58VA21/22/28),” published at 74 FR 29275 (June 19, 2009).
11. There are no questions of a sensitive nature.

12. VA Form 21P-527

Estimate of Information Collection Burden.

- a. Number of Respondents: 25,000
- b. Frequency of Response: one time
- c. Annual Burden Hours: 25,000 hours
- d. Estimated Completion Time: 60 minutes
- 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 \$600,000. (25,000 burden hours x \$24 per hour)

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Estimate of Information Collection Burden.

- a. Number of Respondents: 75,000 per year.
- b. Frequency of Response: one time
- c. Annual burden is 31,250 hours.

d. Estimated Completion Time: 25 minutes

e. The total estimated cost to respondents is \$750,000 (31,250 hrs. x \$24 per hour).

13. This submission does not involve any recordkeeping costs.

14. Estimated Costs to the Federal Government:

a. Total Processing/Analyzing costs \$9,932,125

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(GS-11/5 @ \$47.86 * 75,000 * 50/60 minutes = \$2,991,250)

(GS-9/5 @ \$39.55 * 75,000 * 50/60 minutes = \$2,471,875)

(GS-5/5 @ \$26.10 * 75,000 * 50/60 minutes = \$1,631,250)

Processing/Analyzing costs \$7,094,375

Printing and production cost \$57,750

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(GS-11/5 @ \$47.86 * 25,000 * 60/60 minutes = \$1,196,500)

(GS-9/5 @ \$39.55 * 25,000 * 60/60 minutes = \$988,750)

(GS-5/5 @ \$26.10 * 25,000 * 60/60 minutes = \$652,500)

Processing/Analyzing costs \$2,837,750

Printing and production cost \$21,000

b. Total printing and production cost \$78,750

c. Total cost to government \$10,010,875

15. In RIN 2900-AO73, VA proposes to amend its pension regulations to maintain the integrity of its needs-based pension program. VA has authority under 38 U.S.C. 501(a) to prescribe all rules and regulations which are necessary or appropriate to carry out the laws administered by VA. VA would amend its information collections consistent with RIN 2900-AO73. This rulemaking is largely in response to a Government Accountability Office (GAO) report, GAO-12-50, Veterans' Pension Benefits: Improvements Needed to Ensure only Qualified Veterans and Survivors Receive Benefits.

GAO 12-50 recommended that VBA modify its pension application forms and recommended an up-front verification process. VA has authority under 38 U.S.C. 5317 to use information from the Social Security Administration (SSA) and the Internal Revenue Service (IRS) in an up-front verification process. VA would amend its information collections consistent with the GAO recommendations and an up-front verification process with the SSA and IRS.

Up-front verification also aids in VA compliance with the Improper Payment Elimination and Recovery Act (IPERA), Public Law 112-248.

These forms were redesigned into a “user friendly” form, incorporating plain English, to comply with the President’s Memorandum of June 1, 1998, Plain Language in Government Writing.

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

B. Collection of Information Employing Statistical Methods

The collection of information does not employ statistical methods.