

**Supporting Statement for VA Forms 21P-534, 21P-534a (2900-0004) and  
21P-534EZ (formerly 2900-0747)**

**Application for Dependency and Indemnity Compensation, Death Pension and  
Accrued Benefits by a Surviving Spouse or Child (Including Death Compensation if  
Applicable); Application for Dependency and Indemnity Compensation by a  
Surviving Spouse or Child - In-Service Death; Application for DIC, Death Pension,  
and or, Accrued Benefits**

**A. Justification**

- 1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.**

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. Information is requested by these forms under the authority of 38 U.S.C. 1310 through 1314 and 1532 through 1543. These forms are being transferred from Compensation Service (21) to Pension and Fiduciary Service (21P) due to a change in business line responsibilities, therefore the form prefix has been changed to 21P.

The Final Rule RIN 2900-AO81, *Standard Claims and Appeals Forms*, which requires all claims for benefits to be submitted on an application or form prescribed by the Secretary. VA is codifying its regulations to standardize the use of all VA forms, to include VA Forms 21P-534, 21P-534a and 21P-534EZ.

- 2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.**

VA Form 21P-534 is used to gather the necessary information to determine the eligibility of surviving spouses and children for dependency and indemnity compensation (DIC), death pension, accrued benefits, and death compensation. VA Form 21P-534a is an abbreviated application for DIC that is used only by surviving spouses and children of veterans who died while on active duty service. The VA Form 21P-534EZ is used for the Fully Developed Claims (FDC) program for pension claims.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

VA Forms 21P-534, 21P-534a and 21P-534EZ are available on the One-VA Website in a fillable electronic format. VBA is currently hosting these forms 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. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

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. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The collection of information does not involve small businesses or entities.

**6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently as well as any technical or legal obstacles to reducing burden.**

The VA compensation and pension programs require proof of age and/or relationship for payment of benefits and additional benefits for dependents. Income information is also necessary to determine entitlement to death pension. 38 U.S.C. 5101 states that when a claimant files a claim for death benefits VA must consider entitlement to all death benefits. Therefore, VA Form 21P-534 requests all the information needed to determine eligibility for DIC, death pension, accrued benefits, and death compensation. Very few applicants are entitled to death compensation. If entitlement to both DIC and death pension is established, VA pays the greater benefit.

VA Form 21P-534a requests only the information that is needed from the claimant in order to process a claim based on in-service death. When a service member dies in service, the surviving spouse and/or children are entitled to DIC. Accrued benefits and death compensation are not payable in these cases, and DIC is always a greater benefit than death pension. Additionally, service and death information are provided to VA by the Department of Defense, so VA Form 21P-534a also does not request this information from the claimant.

The VA Form 21P-534EZ is used in the fully developed claims (FDC) program.

Without this collection of information, entitlement to benefits could not be determined.

- 7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OMB.**

There is no special circumstance requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on cost and hour burden.**

The Department notice was published in the Federal Register on September 25, 2014, Volume 79, No. 186, pages 57656-57657. No comments were received.

- 9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

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

- 10. Describe any assurance of privacy, to the extent permitted by law, provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

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 on June 19, 2009, and last amended at 77 FR 42593 (July 19, 2012).

- 11. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature.

**12. Estimate of the hour burden of the collection of information:**

Estimate of Information Collection Burden.

- a. Number of Respondents: 145,520:
  - 32,438 for VA Form 21P-534
  - 1,426 for VA Form 21P-534a
  - 111,656 for VA Form 21P-534EZ
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- b. Frequency of Response: one time.
- c. Annual Burden Hours: 87,428:
  - 46,523 for VA Form 21P-534EZ
  - 40,905 for VA Forms 21P-534 and 21P534a
- d. Estimated Completion Time:
  - 75 minutes for VA Form 21P-534
  - 15 minutes for VA Form 21P-534a
  - 25 minutes for VA Form 21P-534EZ
- 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 \$2,098,272 (87,428 burden hours x \$24 per hour).

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

This submission does not involve any recordkeeping costs.

**14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

Estimated Costs to the Federal Government:

a. Processing/Analyzing costs \$6,996,358

VA Form 21P-534

(GS-11/5 @ \$33.92 x 32,438 x 75/60 minutes = \$1,375,371)

(GS-10/5 @ \$30.88 x 32,438 x 75/60 minutes = \$1,252,106)

(GS-3/5 @ \$14.73 x 32,438 x 75/60 minutes = \$ 597,264)

VA Form 21P-534a

(GS-11/5 @ \$33.92 x 1,426 x 15/60 minutes = \$12,092)

(GS-10/5 @ \$30.88 x 1,426 x 15/60 minutes = \$11,008)

(GS- 3/5 @ \$14.73 x 1,426 x 15/60 minutes = \$5,251)

VA Form 21-534EZ

(GS-11/5@ \$33.92 x 111,656 x 25/60 minutes = \$1,578,071)

(GS-9/5 @ \$28.04 x 111,656 x 25/60 minutes = \$1,304,514)

(GS-5/5 @ \$18.50 x 111,656 x 25/60 minutes = \$ 860,681)

- b. Forms are available on the VA inter/intranet forms websites.
- c. Printing and production cost (\$90/thousand) \$77,737
- d. Total cost to government \$7,074,095

**15. Explain the reason for any burden hour changes since the last submission.**

The increase in the number of respondents is due to the addition of VA Form 21P-534EZ to this information collection.

The increase in burden is due to the Final Rule RIN 2900-AO81, *Standard Claims and Appeals Forms* which requires all claims for benefits to be submitted on an application or form prescribed by the Secretary. VA is codifying its regulations to standardize the use of all VA forms, to include VA Forms 21P-534, 21P-534a, and 21P-534EZ. Currently, other than for the initial original claim, VA does not require that claimants submit any subsequent claim on a prescribed VA form. Although there is no substantive change in these forms, VA expects a change in the number of respondents submitting VA Forms 21P-534, 21P-534a, and 21P-534EZ. The total estimated costs to respondents and the federal government have changed as shown in paragraphs 12 and 14 of this statement.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

The information collection is not for publication or tabulation use.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

We are not seeking approval to omit the expiration date for OMB approval.

**18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB 83-I.**

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.