

**Application for Veterans Pension;  
Income, Asset, and Employment Statement  
OMB 2900-0002**

**A. JUSTIFICATION**

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

VA Form 21P-527EZ

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. Title 38 U.S.C. 5101(a) provides that a specific claim in the form provided by the Secretary must be filed in order for benefits to be paid to any individual under the laws administered by the Secretary. VA Form 21P-527EZ will be the prescribed form for Veterans Pension applications.

VA Form 21P-527

VA Form 21P-527 will be used by Veterans to apply for pension benefits after they have previously applied for pension or for service-connected disability compensation using one of the prescribed forms under 38 U.S.C 5101(a). A veteran might reapply for pension if a previous compensation or pension claim was denied or discontinued, or if the veteran is receiving compensation and the veteran now believes that pension would be a greater benefit.

Because VA's proposed rulemaking 2900-AO73 has not been finalized, and because the proposed revisions are based almost entirely on new requirements contained in the rulemaking, VBA decided to not pursue the revisions at this time. Instead, VBA requests an extension of the expiration date for the application forms under the active Information Collection Request (201407-2900-020).

Note

An erroneous Federal Register notice for OMB Control Number 2900-0002 was published at 80 FR 70081 on November 12, 2015. The erroneous notice referenced an unassociated information collection. A corrected notice was published at 80 FR 75703 on December 3, 2015.

**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-527EZ, *Application for Pension*, is the prescribed form for claiming Veterans Pension under the Fully Developed Claim program. VA Form 21P-527EZ is used to gather the necessary information to determine a veteran's eligibility for Veterans Pension. Without the information, VA will not be able to determine a Veteran's eligibility to the benefit. A Veteran may also use this form to file a new Veterans Pension claim after VA has discontinued a previous pension award and the Veteran is requesting his or her benefits be reinstated.

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**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-527EZ and 21P-527 are available on the VA Website in a fillable electronic format. VBA currently hosts 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 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 VA.

**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.**

VA would be unable to determine a Veteran's eligibility for Veterans Pension benefits if this information is not collected. The collection is submitted on an ad hoc (one time) basis, and cannot be submitted less frequently.

**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.

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**8. a. 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 sponsor's notice was published in the Federal Register on Friday, August 7, 2015 (80 FR 47563-47564 [two pages]), soliciting comments on the information collection.

VBA received eighty-three (83) public comments in response to the sponsor's notice. All comments received referenced VBA's proposed revisions to the application forms. Since VBA decided to pursue an extension of the currently approved versions of the forms, these comments are largely addressed.

In the sponsor's notice, the frequency of response was erroneously listed as "annually." The actual frequency of response will be on an ad hoc (one time for most applicants) basis. Twenty-five (25) commenters took issue with VBA collecting this information on an annual basis, as the burden would be too great on all pension beneficiaries, and specifically too great for elderly or infirm beneficiaries. VBA agrees that requiring annual submission of this information is too burdensome. The 30-Day Federal Register Notice will provide the corrected "One-Time" reporting frequency.

An additional thirteen (13) commenters noted that VA previously required Pension beneficiaries to verify their income annually by completing a form known as an Eligibility Verification Report (EVR). That program was suspended in 2012. The commenters stated that the annual reporting requirement for this Information Collection in effect re-establishes the EVR program. The annual reporting requirement in the 60-Day Federal Register Notice was inaccurate, and VA is not re-establishing the EVR program.

Fifty-one (51) commenters stated VA's application process is too complex, too many forms are required to complete the process, and forms are too long. We appreciate the commenters' concerns regarding the complexity of the application process. We have designed the forms to minimize the burden imposed on the applicant and collect only the information necessary to properly administer the benefit.

Twenty-three (23) commenters took issue with the annual respondent burden hours of 84,000 hours. This number is calculated by multiplying the estimated number of respondents by the estimated number of hours required to complete the form. We have revised the estimated number of hours required to complete the 21P-527EZ from 50 minutes to 25 minutes. This change has reduced the burden hours to 59,230 hours. The previous approval of this Information Collection authorized 59,230 burden hours, so the revised forms do not present an increased respondent burden.

Four (4) commenters stated VA should receive the financial data requested in the forms from the Internal Revenue Service (IRS) and/or the Social Security Administration (SSA), based on a claimants federal tax return documents. VA exchanges data with various federal agencies to improve the integrity of the Pension program.

Three (3) commenters expressed concern regarding a disabled individual's ability to understand and complete the forms. We appreciate the difficulty disabled individuals face in completing the forms without assistance, but the information requested on the forms is required to properly administer the pension benefit.

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The Veterans of Foreign Wars of the United States (VFW) submitted one comment which addressed several topics, some of which have been discussed above. VFW noted boxes 8 and 9 on the VA Form 21P-527 EZ are duplicated in Section III of the form. VA agrees the information requested is duplicative and we revised the form to remove the duplication.

VFW stated the instructions on the form create ambiguity about which sections are required to be completed and which sections are conditionally required. VA agrees with the comment and we revised various parts of the form to improve clarity.

VFW stated Section V of the 21P-527EZ has not been updated to comply with *Obergefell v. Hodges*. VA disagrees with this assessment, as all references to the Veteran's sex and the spouse's sex have been removed. VA has not published new regulations or policies which could provide an impetus to update the form to collect information regarding same-sex marriages covered by the *Obergefell* decision. If and when new regulations are published, the form may be updated to collect additional information.

VFW suggested that the form be compatible with optical-recognition scanning, and be made available electronically and to create the ability to submit the form via the eBenefits portal. VA does not currently have compatible technology for optical recognition scanning. VA agrees such technology would be useful, but we are unable to implement the suggestion at this time. The forms will be made available on the va.gov website in the PDF format. VA is pursuing eBenefits functionality to allow the electronic submission of the 21P-527EZ. However, we are unable to project the deployment date of this functionality.

VA received thirteen (13) additional comments which did not contain specific areas of improvement or concern.

**b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure or reporting format, and on the data elements to be recorded, disclosed or reported. Explain any circumstances which preclude consultation every three years with representatives of those from whom information is to be obtained.**

VBA did not consult with outside persons or entities on the modifications to this information collection.

**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 (June 19, 2009).

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

Number of Annual Respondents:	118,197 respondents
VA Form 21P-527EZ –	101,086 respondents
VA Form 21P-527 –	17,111 respondents
Frequency of Response:	One-time
Estimated Completion Time –	1 hour
VA Form 21P-527EZ –	25 Minutes (0.42 hours)
VA Form 21P-527 –	1 hour
Total Burden Hours –	59,230 hours
VA Form 21P-527EZ –	42,119 hours
VA Form 21P-527 –	17,111 hours

**b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB 83-I.**

**c. Provide estimates of annual cost to respondents for the hour burdens for collections of information. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14 of the OMB 83-I.**

The population of respondents is composed entirely of Veterans of the United States Military. Therefore, all respondents are of either a working or retirement age. Entitlement to VA Pension benefits is based upon permanent and total disability, or advanced age (65 or greater), so VA expects most applicants to meet at least one of the two criteria. However, further assumptions about the population (such as education, current employment, and future earning potential) are impossible because of the wide variability of these factors within the respondent populations. Therefore, VBA chose to use generalized wage data to calculate the cost burden to respondents.

The Bureau of Labor Statistics gathers information on full-time wage and salary workers. According to the [latest available data](#) (as of February 29, 2016), the median weekly earnings of full-time wage and salary workers are \$809.00. Assuming a forty (40) hour work week, the median hourly wage is \$20.23.

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VBA estimates completing this form will take one hour. Therefore, VBA estimates the cost burden for each respondent to be \$20.23. There are no expected overhead costs for completing the application.

VBA estimates the total cost of all respondents to be \$1,198,223.00 (59,230 burden hours x \$20.23 per burden hour).

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

The submission does not involve any record-keeping 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.**

Processing/Analyzing costs	\$3,962,554
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VA Form 21P-527EZ

- (GS-11/5 @ \$33.92 x 101,086 x 25/60 minutes = \$1,428,682)
- (GS-9/5 @ \$28.04 x 101,086 x 25/60 minutes = \$1,181,021)
- (GS-5/5 @ \$18.50 x 101,086 x 25/60 minutes = \$ 779,205)

VA Form 21P-527

- (GS-11/5 @ \$33.92 x 17,111 x 25/60 minutes = \$241,835)
- (GS-9/5 @ \$28.04 x 17,111 x 25/60 minutes = \$199,914)
- (GS-5/5 @ \$18.05 x 17,111 x 25/60 minutes = \$131,897)

Printing and production cost (\$90/thousand)	\$10,638
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Total cost to government	\$3,973,192
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**15. Explain the reason for any burden hour changes since the last submission.**

Since VBA decided to not pursue the proposed revisions, there are no burden hour changes. In the active ICR, the respondents' Annual Cost Burden was not calculated. VBA included the calculation in this ICR (see item 12 of this supporting statement for the calculation).

**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 collected is not for tabulation.

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**17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

We are not seeking to omit the expiration date.

**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 include any exceptions to the certification statement.

### **B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

No statistical methods are used in this data collection.