

**OMB # 2900-0002**  
**Forms 21P-527, 21P-527EZ,**  
**60-Day Notice, Comment Received 8-11-20**

**Comment #3:**

A Mr. Kermit Kubitz, on August 11, 2020, submitted the following comment: “The form for requesting a pension asks for excessive information which is not needed.

1. It asks for all prior marriages and prior marriages of spouses. This is not needed and should be deleted
2. It asks if the residence is owned and land could be sold without the residence. This is excessive and should be deleted.
3. It asks for assets over \$10,000. This level is too low and should be raised to at least \$100,000 so that veterans with assets less than 10,000 do not need to provide any additional information
4. It asks for various kinds of health and medical treatment information which should be available from VA treatment centers and electronic health records. These records should be used by reference from a Veteran who should merely specify if he has been treated by the VA and if so during what years.
5. If the Veteran already has a disability rating, the disability rating should be enough to qualify for a Veterans pension without all the detail.

Overall, the form 527 is excessive in length, asks for unneeded information, and should be simplified to provide benefits to Veterans as easily as possible. The Half hour time estimate for filling out the form is understated and could take at least 2-3 hours to fill out and gather information completely. Simply reducing all the extraneous information requested would bring it closer to the half hour time estimate.”

**VBA Response #3:**

VA Forms 21P-527, *Income, Asset, and Employment Statement*, and 21P-527EZ, *Application for Veterans Pension* are applications for VA Pension benefits. The Pension benefit is a needs-based benefit program for wartime Veterans, who are age 65 or older or have a permanent and total non-service-connected disability and have limited income and net worth.

1. VA pays Veterans pension based on the income of and asset amounts for the Veteran and their spouse. Completion of the dependent sections provides the VA with the information required by law to establish dependency. This allows VA to appropriately evaluate the income and asset limits that apply to the Veteran. Establishing dependents is also important for determining eligibility for other VA programs.
2. VA is required by law to consider all assets of an applicant when determining eligibility for the Pension program. Assets are viewed as the fair market value of all property that an individual owns, including all real and personal property (excluding the value of the primary residence including the residential lot area, not to exceed 2 acres) less the amount of mortgages or other encumbrances.

3. As the Pension program is needs based, the VA evaluates a Veteran's assets when determining eligibility for the Pension Program. The listing of all assets above \$10,000 provides the VA with an understanding of the financial assets available to the Veteran.
4. Pension program eligibility is not limited to service-connected disabilities, as such applicants are encouraged to provide medical records showing how their disability prevents them from working, including records from private providers. Veterans who are aged 65 or older, or determined to be disabled by the social security, do not need to submit medical evidence unless they are claiming special monthly pension.
5. Veterans who are aged 65 or older or determined to be disabled by the Social Security Administration, do not need to submit medical evidence unless they are claiming special monthly pension.

The estimated respondent burden is an average time burden for a respondent to input information into the form. This average does account for any time the claimant may spend prior to the completion of the form gathering information or developing their claim, as the time spent varies greatly based on the individual circumstances surrounding the Veteran's claim for pension.