

## **SUPPORTING STATEMENT**

VA Form 27-0820, Report of General Information  
VA Form 27-0820a, Report of First Notice of Death  
VA Form 27-0820b, Report of Nursing Home or Assisted Living Information  
VA Form 27-0820c, Report of Defense Finance and Accounting Service (DFAS)  
VA Form 27-0820d, Report of Non-Receipt of Payment  
VA Form 27-0820e, Report of Incarceration  
VA Form 27-0820f, Report of Month of Death

**2900-0734**

### **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. The 38 Code of Federal Regulations 3.217 provides that action affecting entitlement to benefits may be taken based on oral information or statements provided to VA by a beneficiary or his or her fiduciary.

**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 27-0820, 27-0820a, 27-0820b, 27-0820c, 27-0820d, 27-0820e and 27-0820f will be used by VA Regional Office and Pension Maintenance Center employees to meet VA's requirement to document verbal evidence obtained telephonically from VA beneficiary or claimant that will be used as part of the evidence for a claim for benefits. Without this information action cannot be taken on any information received orally.

**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 Form 27-0820, 27-0820a, 27-0820b, 27-0820c, 27-0820d, 27-0820e and 27-0820f are forms which will become available on the va.gov web site in a fillable electronic format and VBA's Virtual VA application. VBA maintains a secure server for forms of this type but 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 all 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.**

Without this information, entitlement to benefits may be delayed or could not be determined.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to 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;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

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 sponsor in response to these comments. Specifically address comments received on cost and hour burden.**

The Department notice was published in the Federal Register on July 9, 2021, Volume 83, No. 23, pages 5513 and 5514. No comments were received.

**9. Explain any decision to provide any payment or gift to respondents.**

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

**10. Describe any assurance of confidentiality 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 84 FR 4138 on February 14, 2019 19, 2009, and last amended at 77 FR 42593 (July 19, 2012).

**11. Provide additional justification for any questions of a sensitive nature, 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: 2,550,000 per year

VA Form 27-0820, Report of General Information – 236,000.

VA Form 27-0820a, Report of First Notice of Death – 80,000.

VA Form 27-0820b, Report of Nursing Home or Assisted Living Information – 30,000.

VA Form 27-0820c, Report of Defense Finance and Accounting Service (DFAS) – 30,000

VA Form 27-0820d, Report of Non-Receipt of Payment – 30,000.

VA Form 27-0820e, Report of Incarceration – 10,000.

VA Form 27-0820f, Report of Month of Death – 10,000.

- b. Frequency of Response: one time.
- c. Annual Burden Hours: 212,500 hours.
- d. The estimated completion time of 5 minutes is based on review by staff personnel.
- e. The respondent population is composed of the general population. VBA cannot make further assumptions about the population of respondents because of the variability of factors such as the educational background and wage potential of respondents. Therefore, VBA used general wage data to estimate the respondents' costs associated with completing the information collection.

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the median weekly earnings of full-time wage and salary workers is \$984.00. Assuming a forty (40) hour work week, the median hourly wage is \$20.17 based on the BLS occupation code – “00-0000 All Occupations”.

This information is taken from the following website:

([https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm), May 2020 and <https://www.bls.gov/cps/cpsaat39.htm>, January 2021).

Legally, respondents may not pay a person or business for assistance in completing the information collection and a person or business may not accept payment for assisting a respondent in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VBA estimates the total cost to all respondents to be \$4,286,125.00 (212,500 burden hours x \$20.17 per hour).

**13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

This 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.**

Estimated Costs to the Federal Government:

Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
9	3	5	0.08	\$23.55	\$1.963	2,550,000	\$ 5,004,375.00
Overhead at 100% Salary							\$ 5,004,375.00
11	3	5	0.08	\$28.50	\$2.375	2,550,000	\$ 6,056,250.00
Overhead at 100% Salary							\$ 6,056,250.00
12	3	5	0.08	\$34.16	\$2.847	2,550,000	\$ 7,259,000.00
Overhead at 100% Salary							\$ 7,259,000.00
Processing / Analyzing Costs							\$ 36,639,250.00
Printing and Production Cost							\$ 1,831.96
Total Cost to Government							\$ 36,641,081.96

Overhead costs are 100% of salary and are same as the wage listed above and the amounts are included in the total.

Note: The hourly wage information above is based on the hourly 2021 General Schedule (Base) Pay ([https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/GS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/GS_h.pdf)). This rate does not include any locality adjustment as applicable.

The processing time estimates above are based on the actual amount of time employees of each grade level spend to process to completion a claim received on this form. The within-grade step (3) of each employee represents the average experience of employees within each grade.

**15. Explain the reason for any program changes or adjustments reported in Items 13 or 14 of OMB 83-I.**

N/A

**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.**

This information collection is not for publication or tabulation use.

**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 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**

The data collection does not employ statistical methods.