

Supporting Statement for  
OMB #2900-0002

| VA Form # | Title                                      |
|-----------|--|
| 21P-527   | Income, Net Worth and Employment Statement |
| 21P-527EZ | Application for Veterans Pension           |

**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. 38 U.S.C. 5101(a), 38 CFR 1502, 38 CFR 1503 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, *Application for Pension*, is the prescribed form for Veterans Pension applications. VA Form 21P-527 *Income, Net Worth and Employment Statement*, is 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. A Veteran might reapply for pension using this form 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.

The following updates were made:

- VA Form 21P-527EZ, *Application for Veterans Pension*
- VA Form 21P-527, *Income, Net Worth and Employment Statement*

VA Form 21P-527EZ has been updated, to include:

- Updated instructions.
- Added an optional use Veterans Benefits Application Checklist for applicant's benefit to assist in organizing submission of claim
- Separated Section I and II to split Veteran's Identification Information from contact information
- Removed questions – How many times veteran married? / How many times Spouse married? as regulations allow
- Removed mailing address of nursing home or facility from Section VIII as this is covered in the Worksheet the claimant is directed to complete.
- Added an income source section and updated Section IX instructions to reflect this change.
- Added an Alternate Signer Certification and Signature (Section XIII).
- Restructured Worksheet for An Assisted Living, Adult Daycare, or a Similar Facility and the Worksheet for In-Home Attendant Expenses and questions removed for better clarity.

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- New standardization data points; to include optical character recognition boxes. This is a non-substantive change.

No changes have been made to the VA Form 21P-527.

The respondent burden has decreased due to a change in receivables. The estimated number of receivables averaged over the past year decreased since the last submission.

**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, is the prescribed form for claiming Veterans Pension under the Fully Developed Claim program. VA Form 21P-527 is used to gather the necessary information to determine a veteran's eligibility for Veterans Pension. Without this 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.

**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 is available on the VA.gov Website in a way so that the information can be collected electronically. 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. The data is directly transcribed onto the form and reviewed in the standard process.

**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.

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- 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 Form 21P-527EZ, is the prescribed form for claiming Veterans Pension under the Fully Developed Claim program. VA Form 21P-527 is used to gather the necessary information to determine a veteran's eligibility for Veterans Pension. Without this 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.

- 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 publications 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 30 March 2022 (Volume 87, No. 61, 2 Pages 18484 – 18485). One comment has been received in response to this notice.

Jacqueline Rychnovsky, Executive Director of Commissioned Officers Association of the U.S. Public Health Service, comment was to update the branches service to include NOAA and USPHS.

We would like to thank Jacqueline Rychnovsky for her comment and agree that the additional branches should be added. The additional edit to the form will be included in this new version.

- 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.

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**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 84 FR 4138 (February 14, 2019).

**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:**

- a. Number of Respondents is estimated at 53,958 per year.
  - i. VA Form 21P-527EZ total is 53,518
  - ii. VA Form 21-527 total is 440
- b. Frequency of Response is one time.
- c. Annual burden hours are 24,731 hours.
- d. The estimated completion time for each form is 27.5 minutes.
  - i. VA Form 21P-527EZ completion time is 30 minutes
  - ii. VA Form 21-527 completion time is 25 minutes
- e. The respondent population for VA Forms 21P-527 and 21P-527EZ are composed of individuals who are applying for pension benefits. VA 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 mean hourly wage is \$28.01 based on the BLS wage code – “00-0000 All Occupations.” This information was taken from the following website: [https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm).

Legally, respondents may not pay a person or business for assistance in completing the information collection. Therefore, there are no expected overhead costs for completing

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the information collection. VBA estimates the total cost to all respondents to be \$1,511,363.58 (53,958 burden hours x \$28.01 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:

| Grade                        | Step | Burden Time | Fraction of Hour | Hourly Rate | Cost Per Response | Total Responses | Total           |
|------------------------------|------|-------------|------------------|-------------|-------------------|-----------------|-----------------|
| 7                            | 3    | 30          | 0.50             | \$19.68     | 9.840             | 181,588         | \$ 530,946.72   |
| Overhead at 100% Salary      |      |             |                  |             |                   |                 | \$ 530,946.72   |
| 9                            | 3    | 15          | 0.25             | \$24.07     | 6.018             | 181,588         | \$ 324,692.27   |
| Overhead at 100% Salary      |      |             |                  |             |                   |                 | \$ 324,692.27   |
| 11                           | 3    | 15          | 0.25             | \$29.12     | 7.280             | 181,588         | \$ 392,814.24   |
| Overhead at 100% Salary      |      |             |                  |             |                   |                 | \$ 392,814.24   |
| Processing / Analyzing Costs |      |             |                  |             |                   |                 | \$ 2,496,906.45 |
| Printing and Production Cost |      |             |                  |             |                   |                 | \$ 27,743.41    |
| Total Cost to Government     |      |             |                  |             |                   |                 | \$ 2,524,649.86 |

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

Printing and production costs approximates the cost of printing this information collection per year. (Processing/Analyzing Cost total divided by \$90).

Note: The hourly wage information above is based on the hourly 2022 General Schedule (Base) Pay ([SALARY TABLE 2022-GS \(opm.gov\)](https://www.opm.gov/policy-data-oversight/salaries/)). 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

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form. The within-grade step (3) of each employee represents the average experience of employees within each grade.

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

The respondent burden has not changed

**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 omit 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**

No statistical methods are used in this data collection.