

## SUPPORTING STATEMENT - PART A

### Income and Asset Statement in Support of Claim for Pension or Parent's Dependency and Indemnity Compensation (D.I.C.) – 2900-0829

#### Summary of Changes from Previously Approved Collection

- Reorganized the layout to group instructions first, then questions.
- Income and asset types reorganized for easier completion by claimants and faster processing.
- Income and Asset information has been expanded.
- Updated instructions.
- New standardization data points; to include optical character recognition boxes. This is a non-substantive change.
- Date range added to better aid in processing and allows for claimants to report historical information.
- Specific options provided for specific questions to reduce ambiguity.
- Questions regarding trusts and annuities expanded to reduce development.
- Signature blocks added to allow for standalone submissions.
- Burden has decreased due to actual receipts.
- One public comment was received asking to review a draft document. A document was provided.

#### 1. Need for the Information Collection

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. Information requested by this form is authorized under the authority of 38 U.S.C. 1503, Determinations with respect to annual income, 38 U.S.C. 1315, Dependency and indemnity compensation to parents, and 38 U.S.C. 1543, Net worth limitation.

#### 2. Use of the Information

VA Form 21P-0969 will be used by claimants for VA Pension or Parents' Dependency and Indemnity Compensation (DIC) to provide information pertaining to income and assets to establish entitlement to Pension or Parents' DIC. This form will be completed only by those claimants who had income other than Social Security benefits during the calendar year before claiming benefits or who disposed of assets or have significant assets which may affect their entitlement to needs-based benefits.

3. Use of Information Technology (1-4 sentences)

For the information collected on VA Form 21P-0969, VA does not currently use automated, electronic, mechanical, or other technological collection techniques. The form modifications are designed to be inclusive of these types of changes in the future.

VA Form 21P-0969 is available on the benefits.va.gov website in a fillable electronic format.

VBA is currently working on putting the technology in place to allow for the electronic submission and processing of the form. To ease the burden on respondents, VBA plans to develop and deploy functionality enabling electronic submission of this information. VBA cannot estimate the date this functionality will be deployed.

4. Non-duplication (1-2 sentences)

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses(1-2 sentences)

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection (1-3 sentences)

VBA would be unable to properly administer needs-based benefits without this collection of information. The information is collected on an ad hoc basis, and, therefore, cannot be collected less frequently. The form is designed to collect the minimum amount of information which will allow VBA to properly administer the program.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Thursday, July 6, 2023. The 60-Day FRN citation is Volume 88 FRN 43171.

1 comment was received during the 60-Day Comment Period. They are included below in the order they were received, as well as our Agency's response to the comment.

COMMENT 1:
Can I get a copy of the proposed form? Is there a list I could be on to always

receive a copy of the forms related to proposed Pension changes?
RESPONSE 1:
<p>Thank you for your inquiry as it pertains to these form changes.</p> <p>The draft forms currently under public comment from Pension and Fiduciary Service (P&amp;FS) are attached for your review: 1) VA Form 21P-0969 and 2) VA Form 21P-8416.</p> <p>The drafts should be reviewed only for the purpose of making public comments. There is no centralized means to receive draft copies of forms prior to their approval by OMB. Forms may change at any time in response to public comments, and there is no guarantee that the draft copies provided will be the final version of the form. P&amp;FS will respond to requests to review draft forms on a case-by-case basis.</p>

A 30-Day Federal Register Notice for the collection published on Friday, September 15, 2023. The 30-Day FRN citation is 88 FRN 63677-63678.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

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. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument(s)

Income and Asset Statement in Support of Claim for Pension or Parent's Dependency and Indemnity Compensation (D.I.C.)

- a) Number of Respondents: 55,000
- b) Number of Responses Per Respondent: One time
- c) Number of Total Annual Responses: 55,000
- d) Response Time: 25 minutes
- e) Respondent Burden Hours (*C multiplied by D, computed into hours*): 22,917 hours

2) Total Submission Burden (Summation or average based on collection)

- a) Total Number of Respondents: 55,000
- b) Total Number of Annual Responses: 55,000
- c) Total Respondent Burden Hours (*P: add all "e's" in this section*): 22,917 hours

Part B: LABOR COST OF RESPONDENT BURDEN

*(P): OMB believes that everyone's time is worth money. In this section, we're determining that if the respondent was working at their job, how much would they make in the time it takes them to respond to the collection instrument?*

*If respondents are salaried, and not hourly wage-earners, approximate the hourly wage as best as possible. For a good estimate, divide respondent salary by 52 weeks, then divide again by 40 hours to come up with a respondent hourly wage.*

1) Collection Instrument(s)

Income and Asset Statement in Support of Claim for Pension or Parent's Dependency and Indemnity Compensation (D.I.C.)

- a) Number of Total Annual Responses: 550,000
- b) Response Time: 25 minutes
- c) Respondent Hourly Wage: \$29.76
- d) Labor Burden per Response: \$12.40
- e) Total Labor Burden: \$682,000.00

2) Overall Labor Burden

- a) Total Number of Annual Responses: 55,000
- b) Total Labor Burden: \$682,000.00.

The Respondent hourly wage was determined by using the Department of Labor Wage Website (<http://www.dol.gov/dol/topic/wages/index.htm>)

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instrument(s)

Income and Asset Statement in Support of Claim for Pension or Parent's Dependency and Indemnity Compensation (D.I.C.)

Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
7	3	25	0.42	\$20.49	\$8.60	55,000	\$ 473,000.00
9	3	20	0.33	\$25.06	\$8.27	55,000	\$ 454,850.00
11	3	20	0.33	\$30.32	\$10.01	55,000	\$ 550,550.00
Processing / Analyzing Costs per response					\$26.88		
Total Cost to Government							\$ 1,478,400.00

2) Overall Labor Burden

- a) Total Number of Annual Responses: 55,000
- b) Total Labor Burden: \$1,478,400.00.

Part B: OPERATIONAL AND MAINTENANCE COSTS

*(P): To determine Operational and Maintenance Costs, think of the incidental or miscellaneous costs to owning this collection. How much does equipment, printing, or postage for this collection cost? Are there any overhead costs for purchasing or licensing software? If a database or system is involved, how much money does it take to maintain the system? If you do have incur any Operational and Maintenance costs through this collection, please put "\$0" next to each category.*

1) Cost Categories

- a) Equipment: \$0
- b) Printing: \$32,853.33
- c) Postage: \$0
- d) Software Purchases: \$0
- e) Licensing Costs: \$0
- f) Other: \$0

2) Total Operational and Maintenance Cost: \$32,853.33

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$1,478,400.00
- 2) Total Operational and Maintenance Costs: \$32,853.33
- 3) Total Cost to the Federal Government: \$1,511,253.33.

15. Reasons for Change in Burden

The burden has decreased since the previous approval due to actual receipts of the form.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to “Certification for Paperwork Reduction Submissions”

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.