

## SUPPORTING STATEMENT - PART A

Request for Information to Make Direct Payment to Child Reaching Majority – 2900-0215

### Summary of Changes from Previously Approved Collection

- There have been no changes from the previously approved collection.
- This is an extension of a previously approved collection, and the respondent burden has not changed.

#### 1. Need for the Information Collection (1-3 paragraphs)

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. 1310, 1313, 1542, and 101(4) provide for payment of death pension or dependency and indemnity compensation (DIC) to an eligible veteran's child when there is not an eligible surviving spouse and the child is between the ages of 18 and 23 and attending school. Until the child reaches the age of majority, payment is made to a custodian or fiduciary on behalf of the child. An unmarried schoolchild who is not incompetent is entitled to begin receiving direct payment on the age of majority. Regulatory authority is found in 38 CFR 3.403, 3.667, and 3.854.

#### 2. Use of the Information (2-4 paragraphs)

Form Letter 21P-863 is used to gather the necessary information to determine a school child's continued eligibility for VA death benefits and eligibility to direct payment at the age of majority.

Respondents are beneficiaries of VA pension who have a child on their award that is reaching the age of majority. The form is used to gather information about whether the child is still in school and to establish continued entitlement to death benefits.

The beneficiary is sent this information collection to complete and return to the VA by mail. Once the form is received by the VA, the information is reviewed to determine whether or not the dependent will establish continued entitlement to VA death benefits.

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

Form Letter 21P-863 is not available on the public-facing VA.gov website. VBA does not currently have the technology in place to allow for the electronic submission of the form. 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. 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)

Form Letter 21P-863 is used to gather the necessary information to determine a schoolchild's continued eligibility to VA death benefits and eligibility to direct payment at the age of majority. If the collection were not conducted, VA would have no means of determining a child's current address, marital status, and school attendance. Without this information, continued entitlement to death benefits and eligibility for direct payment at the age of majority could not be determined, and proper payment would not be made.

7. Paperwork Reduction Act Guidelines (1 sentence)

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, August 10, 2023. The 60-Day FRN citation is Vol. 88 FRN 54401-54402.

A 30-Day Federal Register Notice for the collection published on Wednesday, October 18, 2023. The 30-Day FRN citation Vol. 88 FRN 71928-71929.

Part B: CONSULTATION (2-4 sentences)

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

9. Gifts or Payment (1-3 sentences)

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).

A System of Record Notice (SORN) is not required for this collection because records are not retrievable by PII.

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

11. Sensitive Questions (1 paragraph)

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)

Request for Information to Make Direct Payment to Child Reaching Majority

- a) Number of Respondents: 20
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 20
- d) Response Time: 10 mins
- e) Respondent Burden Hours: 3 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

Request for Information to Make Direct Payment to Child Reaching Majority

- a) Number of Total Annual Responses: 20
- b) Response Time: 10 mins
- c) Respondent Hourly Wage: \$29.76
- d) Labor Burden per Response): \$297.6
- e) Total Labor Burden: \$5,952

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 \$29.76 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).

13. Respondent Costs Other Than Burden Hour Costs (1-4 sentences)

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

*(P): Repeat (using copy and paste) 1a-e for each collection instrument.*

1) Collection Instrument(s)

Request for Information to Make Direct Payment to Child Reaching Majority

- a) Number of Total Annual Responses: See Chart Below
- b) Processing Time per Response: See Chart Below
- c) Hourly Wage of Worker(s) Processing Responses: See Chart Below
- d) Cost to Process Each Response (*P: B multiplied by C*): See Chart Below
- e) Total Cost to Process Responses (*P: A multiplied by D*): \$552.52 (See Chart Below)

Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
7	3	15	0.25	\$20.49	5.123	20	\$ 102.45
Overhead at 100% Salary							\$ 102.45
9	3	15	0.25	\$25.06	6.265	20	\$ 125.30
Overhead at 100% Salary							\$ 125.30
11	3	5	0.08	\$30.32	2.426	20	\$ 48.51
Overhead at 100% Salary							\$ 48.51
Processing / Analyzing Costs							\$ 552.52
Printing and Production Cost							\$ 6.14
Total Cost to Government							\$ 558.66

**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: \$6.14
- c) Postage: \$0
- d) Software Purchases: \$0
- e) Licensing Costs: \$0
- f) Other: \$0

2) Total Operational and Maintenance Cost: (P: Add a) through f) in this section) \$6.14

**Part C: TOTAL COST TO THE FEDERAL GOVERNMENT**

- 1) Total Labor Cost to the Federal Government: \$552.52
- 2) Total Operational and Maintenance Costs: \$6.14

3) Total Cost to the Federal Government (P: Add 1 and 2 in this section): \$558.66

15. Reasons for Change in Burden (1-7 sentences)

There has been no change in burden since the last approval.

16. Publication of Results (1 sentence/ 1 paragraph)

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date (1 sentence/ 1 paragraph)

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" (1 sentence)

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