

Supporting Statement - Part A

Residency Verification Report-Veterans and Survivors Control #2900-0655

Summary of Changes from Previously Approved Collection

- There have been no substantive changes made to this collection.
- The burden estimate has decreased due to:
 - 1) a decrease in the number of minutes it takes to fill out the form, and
 - 2) the respondent total has also decreased since the previous approval due to the estimated number of receivables averaged over the past year.

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. Information is requested by Form Letter 21-914, *Residency Verification Report-Veterans and Survivors*, under the authority of 38 U.S.C. 107.

38 U.S.C. 107 allows Filipino veterans of the Special Philippine Scouts, Commonwealth Army of the Philippines, or organized guerilla groups to receive service-connected compensation benefits at the full-dollar rate if they reside in the United States as United States citizens or as aliens lawfully admitted for permanent residence. 38 U.S.C. 107 also allows their survivors to receive service-connected death benefits at the full-dollar rate if they meet the U.S. residency requirements. The regulatory basis is 38 C.F.R. 3.42.

2. Use of the Information

The respondent population for Form Letter 21-914 is composed of veterans or beneficiaries who are receiving benefits at the full-dollar rate based on U.S. residency and must complete this form to certify their continued eligibility to receive benefits at the full-dollar rate.

As such, this collection of information is used to gather the necessary information which is necessary to verify whether a veteran or beneficiary who is receiving benefits at the full-dollar rate based on U.S. residency continues to meet the residency requirements. Continued eligibility to benefits at the full-dollar rate cannot be determined without complete information about a veteran's or beneficiary's residency.

3. Use of Information Technology

Form Letter 21-914 is available on the One-VA Website in a fillable electronic format. VBA is currently hosting this form on a secure server and does not currently have the technology in place to allow for the complete submission of the form. Validation edits are performed to

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assure data integrity. 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

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

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

6. Less Frequent Collection

Without this information, determination of entitlement would not be possible.

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 Friday, September 29, 2023. The 60-Day FRN citation is Vol. 88 FR 188, page 67454. No comments were received during the 60-day comment period.

A 30-Day FRN for the collection published on Monday, December 4, 2023. The 30-Day FRN citation is Vol. 88 FR 231, page 84185. No comments were received during the 30-day comment period.

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.

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10. Confidentiality

The records are maintained in the appropriate Privacy Act System of Records identified as “Compensation, Pension, Education, and Veteran Readiness and Employment Records-VA (58VA21/22/28),” published at 74 FR 29275 on June 19, 2009, and last amended at 87 FR 8740 (February 16, 2022).

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

- a. Number of Respondents is estimated at 900 per year.
- b. Frequency of Response is one time.
- c. Annual burden hours are 75 hours.
- d. The estimated completion time for each form is 5 minutes.
- e. 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 \$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.

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 the information collection. VBA estimates the total cost to all respondents to be \$2,232.00 (75 burden hours x \$29.76 per hour).

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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. Costs to the Federal Government

Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
7	3	5	0.08	\$20.49	1.708	900	\$ 1,536.75
Overhead at 100% Salary							\$ 1,536.75
9	3	5	0.08	\$25.06	2.088	900	\$ 1,879.50
Overhead at 100% Salary							\$ 1,879.50
11	3	5	0.08	\$30.32	2.527	900	\$ 2,274.00
Overhead at 100% Salary							\$ 2,274.00
Processing / Analyzing Costs							\$ 11,380.50
Printing and Production Cost							\$ 126.45
Total Cost to Government							\$ 11,506.95

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 2023 General Schedule (Base) Pay ([SALARY TABLE 2023-GS \(opm.gov\)](https://www.opm.gov/policy-data-oversight/salary/)). 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. Reason for Change in Burden

The burden has decreased since the previous approval due to:

- 1) a decrease in the number of minutes it takes to fill out the form, and
- 2) the respondent total has also decreased since the previous approval due to the estimated number of receivables averaged over the past year.

16. Publication of Results

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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.