

Supporting Statement - Part A

Mandatory Verification of Dependents – Control #2900-0500

Summary of Changes from Previously Approved Collection

- No substantive changes have been made to this form.
- The respondent burden has decreased 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 VA Form 21-0538, *Mandatory Verification of Dependents*, under the authority of Title 38 U.S.C. 501 *Rules and Regulations*.

Regulatory authority is found in 38 C.F.R. 3.652 *Periodic Certification of Continued Eligibility*, that requires veterans to certify entitlement factors when requested, so VA can determine continued entitlement to the benefits being paid.

2. Use of the Information

The respondent population for VA Form 21-0538 is composed of individuals who are providing status of their dependents.

As such, this collection of information is used to request verification of the status of dependents for whom additional compensation is being paid to veterans.

3. Use of Information Technology

VA Form 21-0538 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 assure data integrity.

VA Form 21-0538 is processed by attaching a cover letter stating the current number of dependents the respondent is receiving compensation and mailed in a batch print cycle approximately every eight years.

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.

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6. Less Frequent Collection

Without this information, continued entitlement to the benefits for dependents could not be determined.

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, October 6, 2023. The 60-day FRN citation is Vol. 88 FR 193, page 69683. No comments were received during the 60-day comment period.

A 30-day FRN for the collection published on Monday, December 11, 2023. The 30-Day FRN citation is Vol. 88 FR 236, page 86017. 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.

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

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- a. Number of Respondents is estimated at 123,246 per year.
- b. Frequency of Response is one time.
- c. Annual burden hours are 20,541 hours.
- d. The estimated completion time for each form is 10 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 \$611,300.16 (20,541 burden hours x \$29.76 per hour).

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	10	0.17	\$20.49	3.415	123,246	\$ 420,885.09
Overhead at 100% Salary							\$ 420,885.09
9	3	5	0.08	\$25.06	2.088	123,246	\$ 257,378.73
Overhead at 100% Salary							\$ 257,378.73
11	3	5	0.08	\$30.32	2.527	123,246	\$ 311,401.56
Overhead at 100% Salary							\$ 311,401.56
Processing / Analyzing Costs							\$ 1,979,330.76
Printing and Production Cost							\$ 21,992.56
Total Cost to Government							\$ 2,001,323.32

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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 \(opm.gov\)](#)). 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 the estimated number of receivables averaged over the past year.

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.