

Supporting Statement - Part A

Student Beneficiary Report – REPS (Restored Entitlement Program for Survivors) Control #2900-0399

Summary of Changes from Previously Approved Collection

- No changes have been made to this form. The respondent burden has remained the same.
- No comments were received during the 60-day public comment period.

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.

Restored Entitlement Program for Survivors (REPS) benefits are payable to certain surviving spouses and children of veterans who died in service prior to August 13, 1981 or who died as a result of a service-connected disability incurred or aggravated prior to August 13, 1981. Child beneficiaries over age 18 and under age 23 must be enrolled full-time in an approved post-secondary school.

Executive Order 12436 “Payment of Certain Benefits to Survivors of Persons Who Died In or As A Result of Military Service” (found at 42 U.S.C. § 402 (Note)) directs VA administer the provisions of Public Law 97-377 Section 156. VA codified this authority at 38 CFR §3.812.

2. Use of the Information

VBA uses this form to verify that a surviving child who is receiving REPS benefits based on school-child status is in fact enrolled full-time in an approved school and is otherwise eligible for continued benefits. VA Form 21P-8938-1 is generated by VA’s central computer system each March and sent to all student beneficiaries. If the completed form is not received by the end of May, the beneficiary is sent a system-generated due process letter with another VA Form 21P-8938-1.

3. Use of Information Technology

The collection of information does not involve the use of automated, electronic, mechanical, or other technological collection techniques. VA does not currently have technology in place to allow for the electronic submission of this form, though VA may develop this technology in the future.

The form is available in electronically-fillable format on the benefits.va.gov website. However, the form must be printed and physically submitted.

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

If this collection is not conducted, VBA will not be able to adequately evaluate a student's ongoing eligibility to REPS benefits.

The information is collected annually and cannot be collected less frequently.

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, May 10, 2024. The 60-Day FRN citation is 89 FRN 40539.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Tuesday, July 16, 2024. The 30-Day FRN citation is 89 FRN 57995.

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

- a. Number of Respondents is estimated at 1,200 per year.

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- b. Frequency of Response is one time.
- c. Annual burden hours are 300 hours.
- d. The estimated completion time for this form is 20 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 \$31.48 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 \$9,444 (300 burden hours x \$31.48 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. Cost to the Federal Government

Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
9	3	15	0.25	\$26.24	6.560	1,200	\$ 7,872.00
Overhead at 100% Salary							\$ 7,872.00
12	3	10	0.17	\$38.05	6.342	1,200	\$ 7,610.00
Overhead at 100% Salary							\$ 7,610.00
Processing / Analyzing Costs							\$ 30,964.00
Printing and Production Cost							\$ 344.04
Total Cost to Government							\$ 31,308.04

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

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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 2024 General Schedule (Base) Pay ([Pay & Leave : Salaries & Wages - 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. Reasons for Change in Burden

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

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.