

Supporting Statement - Part A

*Request for Substitution of Claimant Upon Death of Claimant*  
Control #2900-0740

Summary of Changes from Previously Approved Collection

- No changes have been made to this form. The respondent burden has decreased due to the estimated number of receivables averaged over the past year.
- 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. Information requested by this form is authorized under the authority of 38 U.S.C. §5121(a), Payment of Certain Accrued Benefits Upon Death of a Beneficiary.

**2. Use of the Information**

VA Form 21P-0847, will be used to allow claimants to request a substitution for a claimant who passed away prior to VA processing a claim to completion. This is only allowed when a claimant dies while a claim or appeal for any benefit under a law administered by the VA is pending. The substitute claimant would be eligible to receive accrued benefits due to a deceased claimant under Section 5121(a). The substitute claim must be filed no later than one year after the claimant's death date. By law, VA must have a claimant's or beneficiary's written permission (an "authorization") to be a substitute claimant. The claimant or beneficiary may revoke the authorization at any time, except if VA has already acted based on the permission.

**3. Use of Information Technology**

VA Form 21P-0847 is available in a fillable electronic format on the VA website. Information is not collected using automated, electrical, mechanical, or other technological techniques.

**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 many small businesses or entities.

**6. Less Frequent Collection**

If this collection is not conducted, VBA cannot administer claims for Substitution of the Claimant. 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 that will allow VBA to administer the program properly.

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**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 Monday, August 12, 2024. The 60-Day FRN citation is 89 FRN 65721.

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

A 30-Day Federal Register Notice for the collection published on Friday, October 18, 2024. The 30-Day FRN citation is 89 FRN 83951.

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 15,000 per year.
- b. Frequency of Response is one time.

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- c. Annual burden hours are 1,200 hours.
- d. The estimated completion time for this 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 \$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](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 \$37,776 (1,200 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	5	0.08	\$26.24	2.187	15,000	\$ 32,800.00
Overhead at 100% Salary							\$ 32,800.00
12	3	3	0.05	\$38.05	1.903	15,000	\$ 28,537.50
Overhead at 100% Salary							\$ 28,537.50
Processing / Analyzing Costs							\$ 122,675.00
Printing and Production Cost							\$ 1,363.06
Total Cost to Government							\$ 124,038.06

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](https://www.opm.gov/policy-data-oversight/salaries-and-wages/)). 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**

The burden has decreased since the previous approval due to 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.