

Supporting Statement - Part A

*Pension Claim Questionnaire for Farm Income*  
Control #2900-0095

Summary of Changes from Previously Approved Collection

- No changes have been made to this form. The respondent burden has remained the same.
- 1 comment received during the 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.

Entitlement to pension benefits for Veterans and their surviving dependents is based on the family's countable annual income under the authority of 38 U.S.C. 1503 and under the authority of 38 U.S.C. 1522.

No other changes have been made to this form. The respondent burden has remained the same.

**2. Use of the Information**

VA Form 21P-4165 is used to gather the necessary information to evaluate the claimant's countable income and net worth related to the operation of a farm to establish entitlement to pension benefits and to evaluate a beneficiary's ongoing entitlement to pension benefits.

**3. Use of Information Technology**

VA Form 21P-4165 is available on the va.gov website in a fillable electronic format. However, the VA may develop this ability in the future. The VA does not currently have a technology solution to allow for the electronic submission of this form.

**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**

VA Form 21P-4165 is used to gather the necessary information to evaluate the claimant's countable income and net worth related to the operation of a farm for the purpose of establishing entitlement to pension benefits and to evaluate a beneficiary's ongoing entitlement to pension benefits. If this collection is not conducted, VBA will not be able to properly evaluate a claimant's income and net worth. Therefore, VBA would not be able to properly administer its pension benefit program as required by statute.

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**7. Paperwork Reduction Act Guidelines**

This information collection 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, June 23, 2025  
The 60-Day FRN citation is 90 FRN 26682.

1 comment received during the 60-Day Comment Period VA is preparing a response.

A 30-Day Federal Register Notice for the collection published on Tuesday, August 26, 2025.  
The 30-Day FRN citation is 90 FRN 41633.

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**

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 218 per year.
- b. Frequency of Response is one time.
- c. Annual burden hours are 109 hours.

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- d. The estimated completion time for this form is 30 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 \$32.66 based on the BLS wage code – “00-0000 All Occupations.” This information was taken from the following website: <https://data.bls.gov/oes/#/industry/000000>.

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 \$3,559.94 (109 burden hours x \$32.66 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	20	0.33	\$35.74	11.913	218	\$ 2,597.11
Overhead at 100% Salary							\$ 2,597.11
12	3	15	0.25	\$51.83	12.958	218	\$ 2,824.74
Overhead at 100% Salary							\$ 2,824.74
Processing / Analyzing Costs							\$ 10,843.68
Printing and Production Cost							\$ 120.49
Total Cost to Government							\$ 10,964.17

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).

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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.