Summary of Changes:

- VAF 20-10208 is currently under the OMB control number of 2900-0877. A new control number is requested to be assigned.
- The respondent population for VA Form 20-10208 has been modified to include claimants submitting evidence as part of a pre-discharge claim. As such, two new questions have been added for these claimants, known as service members.
- Sections of the form have been reformatted and modified to match other collections of information in the managing program office's inventory.
- 1 Comment received during the 60-Day 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 survivors. Information is requested by VA Form (VAF) 20-10208, *Document Evidence Submission*, under the authority 38 U.S.C. § 5102(b) *Application forms furnished upon request*, 38 U.S.C. § 5101(a) *Claims and Forms*, and 38 U.S.C. § 501 *Rules and Regulations*. Regulatory authority is found in 38 C.F.R. § 3.109.

2. Use of the Information

The respondent population for VA Form 20-10208 is composed of individuals who are submitting additional evidence or information in support of a claim, update information on a claimant's VA account, and with this update will be used by a claimant when submitting evidence as part of a pre-discharge claim.

3. <u>Use of Information Technology</u>

VA Forms 20-10208 is available on the VA Website in a fillable electronic format. VBA will host these forms 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. 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.

Less Frequent Collection

VA Form 20-10208 is used by claimants to submit additional evidence or information in support of a claim and to update information on a claimant's VA account. Additionally, this revision adds use by a claimant when submitting evidence as part of a pre-discharge claim. Without this information, VA would not be able to efficiently and successfully process and associate evidence or information of record to a claimant's file which could negatively affect adjudication and decisions made by VA.

6. 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).

7. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Tuesday, September 9, 2025. The 60-Day FRN citation is 90 FRN 43511.

One comment was received during the 60-Day comment period. It is included below, as well as our Agency's response.

Comment: An anonymous comment was received September 11, 2025, stating: VAF20-10208 is neither a required or necessary form and does not assist in claims processing nor useful for claims processors. This form is entirely unnecessary.

VBA Response: As this comment is not relevant to the proposed revision; VBA will not make any changes to VA Form 20-10208. The statement is false as VA Form 20-10208 is voluntary and can be used by claimants when submitting additional evidence or information in support of a claim and with this proposed revision will be able to help submit evidence as part of a pre-discharge claim.

A 30-Day Federal Register Notice for the collection published on Friday, December 12, 2025. The 30-Day FRN citation is 90 FRN 57817.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

8. Gifts or Payment

No payments or gifts to respondents have been made under this collection of information.

9. 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).

10. Sensitive Questions

There are no questions of a sensitive nature.

11. Respondent Burden and its Labor Costs

- a. Number of Respondents is estimated at 81,981 per year.
- b. Frequency of Response is one time.
- c. Annual burden hours are 6,832 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 \$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 \$223,133.12 (6,832 burden hours x \$32.66 per hour).

12. 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.

13. Costs to the Federal Government

Estimated Costs to the Federal Government:

Grad e	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
7	3	10	0.17	\$21.81	3.635	81,981	\$ 298,000.94
Overhead at 100% Salary							\$ 298,000.94
9	3	5	0.08	\$26.68	2.223	81,981	\$ 182,271.09
Overhead at 100% Salary							\$ 182,271.09
11	3	5	0.08	\$32.28	2.690	81,981	\$ 220,528.89
Overhead at 100% Salary							\$ 220,528.89
Processing / Analyzing Costs							\$ 1,401,601.83
Printing and Production Cost							\$ 15,573.35
Total Cost to Government							\$ 1,417,175.18

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 approximate 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 2025 General Schedule (Base) Pay (<u>SALARY TABLE 2025-GS</u>). 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.

14. Reason for Change in Burden

This is a new collection with the associated burden from the previous control number with the additional respondents from this proposed modification.

15. Publication of Results

The results of this information collection will not be published.

16. 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.

17. Exceptions to "Certification for Paperwork Reduction Submissions"

We do not request any exemptions from the provisions stated in 5 CFR 1320.9.

B. Collection of Information Employing Statistical Methods

No statistical methods are used in this data collection.