

Supporting Statement - Part A
Freedom of Information Act (FOIA) or Privacy Act (PA) Request
– Control #2900-0877

Summary of Changes from Previously Approved Collection

- This control number used to include three collections of information:
 - o VA Form 20-10206,
 - o VA Form 20-10207, and
 - o VA Form 20-10208.VA Forms 20-10207 and 20-10208 have been transferred to a new program office and are in progress requesting new control numbers for each.
- The respondent burden has increased due to the estimated number of receivables averaged over the past year.
- 3 public comments were received during the 60-day 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 is requested by VA Form (VAF) 20-10206, *Freedom of Information Act (FOIA) or Privacy Act (PA) Request*, 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 20-10206 is composed of individuals who are requesting access to Federal agency records and requests for access to records based on name or another personal identifier.

3. Use of Information Technology

VA Form 20-10206 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. 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.

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6. Less Frequent Collection

VA Form 20-10206 is used by VA to gather the necessary information to fulfill claimants' requests to access Federal agency records and requests for access to records based on name or another personal identifier. Without this information, VA would not be able to efficiently process FOIA and PA requests in a standardized manner. As such, requests from claimants and stakeholders vary in nature and in scope.

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 Tuesday, June 23, 2026. The 60-Day FRN citation is 91 FRN 37498.

3 public comment were received during the 60-Day comment period.

A 30-Day Federal Register Notice for the collection published on Thursday, August 27, 2026. The 30-Day FRN citation is 91 FRN 55437.

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.

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12. Respondent Burden and its Labor Costs

- a. Number of Respondents is estimated at 172,534 per year.
- b. Frequency of Response is one time.
- c. Annual burden hours are 14,378 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 uses 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 \$469,585.48 (14,378 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. Costs to the Federal Government

Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
12	3	30	0.50	\$ 38.69	19.345	172,534	\$ 3,337,670.23
Overhead at 100% Salary							\$ 3,337,670.23
13	3	15	0.25	\$ 46.01	11.503	172,534	\$ 1,984,572.34
Overhead at 100% Salary							\$ 1,984,572.34
Processing / Analyzing Costs							\$ 10,644,485.13
Total Cost to Government							\$ 10,644,485.13

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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.

Note: The hourly wage information above is based on the hourly 2025 General Schedule (Base) Pay ([SALARY TABLE 2025-GS](#)). 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 respondent burden has increased 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.