

Supporting Statement - Part A

Appointment of Veterans Service Organization as Claimant's Representative and Appointment of Individual as Claimant's Representative – Control #2900-0321

Summary of Changes from Previously Approved Collection

- Power of Attorney (POA) questions have been added to streamline official representative approval by adding the VA POA code and their POA accreditation number.
- Other than minor substantive questions that do not increase the burden on these forms, this proposal is a revision due to the increase in the estimated number of receivables by respondents averaged over the past year.
- Three 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 Forms 21-22, *Appointment of Veterans Service Organization as Claimant's Representative*, and 21-22a, *Appointment of Individual as Claimant's Representative*, under the authorities of, 38 U.S.C. § 5701, 5702, and 7332. Specifically:

- 38 U.S.C. § 5902, *Recognition of Representatives of Organizations*, states that VA may recognize representatives of service organizations to assist beneficiaries in the prosecution of VA claims, but no individual shall be recognized unless such individual has filed a power of attorney, executed in a manner prescribed by VA.
- 38 U.S.C. § 5903, *Recognition with Respect to Particular Claims*, states that VA may recognize an individual as a claimant's representative if no fee or compensation of any nature will be charged and such individual has filed a power of attorney, executed in a manner prescribed by VA.

Regulatory authority is found in 38 C.F.R. § 14.631 and § 1.525.

A properly executed VA Forms 21-22 and 21-22a requires a claimant's signature to indicate appointment of a representative, agent, attorney, or individual providing representation on a particular claim, to provide authority for VA's disclosure of claimant information to the individual appointed and allow the appointed representative authority to change the claimant's address when necessary. These collections of information also require the signature of a representative to indicate acceptance of the appointment and to indicate any limitations to the scope of representation.

2. Use of the Information

The respondent population for VA Forms 21-22 and 21-22a is composed of individuals who are requesting the representation of a Veterans Service Organization or Attorney.

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3. Use of Information Technology

VA Forms 21-22 and 21-22a are 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.

6. Less Frequent Collection

VA Forms 21-22 and 21-22a are used to collect the information needed to determine whom claimants have appointed to represent them in the preparation, presentation, and prosecution of claims for VA benefits. The information is also used to determine the extent of representatives' access to claimants' records. Without this information VA would be unable to determine whom claimants have appointed to represent them in the prosecution of VA claims, the extent of such representation, and access to appropriate records.

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 Wednesday, May 27, 2026. The 60-Day FRN citation is 91 FRN 31525. Three comments were received during the 60-Day comment period.

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Comment 1: A comment was received on June 5, 2026, from Danielle Morrison, stating I think this form can take away some sections that are duplicated and unnecessary. Box 18 is duplicated via boxes 22B and 23B when the veteran and representative sign the form together. Box 17 is unnecessary for I have never received an email in accordance with what the form is providing or requesting. Additionally, as long as my service organization and my accreditation number is present, then my contact information can be found through the VSO VA website. Box 21 is unnecessary has there are multiple ways in which the VA acquires a change of address via va.gov profile, calling the VA hotline to update the address and most specifically the VA Form 20-572, but most times, changes of addresses happen electronically or by phone and do not require the VSO to complete.

VBA Response to Comment 1: Responses to each questions asked.

- Item 18 is the date the appointment occurred and can be different than when the Veteran or Representative signs the form. This often occurs when the form is filled out ahead of when the representative submits the form to the VA.
- Item 17 is necessary as all forms of communication needs to be included in forms such as email addresses. This is consistent with other collections within VBA.
- Item 21 is still necessary as it is an allowable instance where a VSO can act on behalf of the person they are representing to update an address.

VBA will not make any changes based on this comment.

Comments 2 and 3: Comments VA-2026-VACO-0001-0287 and #0288 are the same comment with the same attachment. Both comments were received on July 27, 2026, from a Mr. Hutchens, in the form of a Court receipt with no comments or questions on the proposed information collection.

VBA Response to Comments 2 and 3: The comment received on July 27, 2026, is not relevant to the proposed revision of VA Forms 21-22 and 21-22a (2900-0321). VBA will not make any changes based on this comment.

A 30-Day Federal Register Notice for the collection published on Thursday, July 30, 2026. The 30-Day FRN citation is 91 FRN 48228.

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.

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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 **1,046,113** per year.
- b. Frequency of Response is one time.
- c. Annual burden hours are **87,176** 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 \$33.54 based on the BLS wage code – “00-0000 All Occupations.” This information was taken from the following website: <https://data.bls.gov/oes/#/area/0000000/2025>.

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 \$2,923,883 (87,176 burden hours x \$33.54 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.

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14. Costs to the Federal Government

Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
5	3	5	0.08	\$ 17.79	1.483	1,046,113	\$ 1,550,862.52
Overhead at 100% Salary							\$ 1,550,862.52
7	3	5	0.08	\$ 22.03	1.836	1,046,113	\$ 1,920,489.12
Overhead at 100% Salary							\$ 1,920,489.12
Processing / Analyzing Costs							\$ 6,942,703.28
Printing and Production Cost							\$ 77,141.15
Total Cost to Government							\$ 7,019,844.42

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).

Note: The hourly wage information above is based on the hourly 2026 General Schedule (Base) Pay (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/GS_h.pdf). 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 burden has increased since the previous approval due to the increase in the estimated number of receivables by respondents 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.

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18. Exceptions to “Certification for Paperwork Reduction Submissions”

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.