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General Comment

Financial Status Report, VA Form 5655 — OMB Control No. 2900-0165

I respectfully submit the following comments regarding the Department of Veterans Affairs (VA), Debt Management Center's proposed revision of VA Form 5655 under the Paperwork Reduction Act (PRA).

1. Necessity and Practical Utility

VA Form 5655 serves a legitimate administrative purpose when current financial information is necessary to evaluate waiver requests, compromise offers, financial-hardship determinations, or repayment arrangements. However, DMC should ensure that the form is required only when the requested information is materially necessary to the specific determination being made.

The notice states that VA Form 5655 is no longer required for repayment plans of 60 months or fewer and that certain compensation and pension overpayments may automatically receive 36-month repayment terms. These changes appropriately reduce unnecessary information collection. DMC should continue evaluating whether additional categories of debt resolution can be processed using information already available to VA rather than requiring a complete Financial Status Report.

2. Accuracy of the Burden Estimate

DMC estimates 150,871 annual respondents, 60 minutes per response, and 150,871 annual burden hours. Given the magnitude of this increase, VA should provide sufficient empirical support for both the

projected respondent population and the uniform 60-minute completion estimate.

The current OMB record reflects that the previously approved collection involved substantially fewer annual responses. DMC should distinguish burden attributable to resumed debt collection from changes caused by policy, respondent behavior, or other adjustments. The burden analysis should also account for time spent locating income, expense, asset, employment, and debt records—not merely entering information onto the form. A stratified burden estimate based on submission method and case complexity may provide a more accurate measure than a single 60-minute average.

3. Quality, Utility, and Clarity

DMC should revise Form 5655 and its instructions using plain-language and data-minimization principles. Each requested financial element should have a demonstrable relationship to the applicable debt-management decision.

Instructions should clearly identify required versus conditional fields, acceptable supporting documentation, applicable reporting periods, treatment of irregular income and expenses, and circumstances requiring spouse or household information. DMC should also explain how reported information affects waiver, compromise, hardship, and repayment determinations. This would improve data consistency while reducing incomplete submissions, follow-up requests, and processing delays.

4. Minimizing Respondent Burden Through Technology

VA should prioritize a secure, mobile-accessible electronic workflow that permits respondents to save progress, electronically submit information, receive confirmation, and update previously supplied information rather than repeatedly completing the entire form. Where legally permissible and with appropriate privacy safeguards, information already maintained by VA should be prepopulated or incorporated through verified data exchange.

The existing OMB record indicates electronic reporting has historically represented only a portion of responses. DMC should establish measurable goals for increasing electronic completion and evaluate whether digital submission actually reduces completion time, errors, and subsequent requests for information.

Finally, DMC should consider developing a risk-based or abbreviated financial assessment for cases requiring only limited financial verification. Requiring a comprehensive financial disclosure when a smaller subset of information would support the determination is inconsistent with the PRA's objective of minimizing unnecessary public burden.

Conclusion

VA Form 5655 has practical utility in federal debt administration, but the proposed collection should be calibrated to actual decisional needs. I recommend that DMC validate the substantial projected burden increase, document the methodology supporting the 60-minute estimate, further minimize unnecessary data elements, expand secure electronic and prefilled processes, and use abbreviated financial assessments where appropriate. These measures would preserve VA's ability to administer debts effectively while advancing the PRA's requirements for necessity, accuracy, clarity, utility, and minimum respondent burden.