

SUPPORTING STATEMENT - PART A

Medical Expense Report – 2900-0161

Summary of Changes from Previously Approved Collection

- Extension of a currently approved collection
- The respondent burden has remained the same
- One public comment was 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. Under the authority of 38 U.S.C. 1163, individual unemployability may be payable to a Veteran with service-connected disability or disabilities that render the Veteran unable to secure or follow a substantially gainful occupation. Regulatory authority is found in 38 C.F.R. 4.16, 38 C.F.R. 3.340, and 38 C.F.R. 3.341.

2. Use of the Information

VA Form 21P-8416 allows claimants and beneficiaries to report unreimbursed medical expenses to reduce their countable income for needs-based benefit programs, such as VA Pension and Parents' Dependency and Indemnity Compensation (DIC). Unreimbursed medical expenses are deducted from otherwise countable income to determine eligibility for income-based benefits and the rate payable. Veteran Service Representatives use the information on the form to adjust benefits.

VA Form 21P-8416 can be downloaded from VA.gov/find-forms, and a printed copy is sent to beneficiaries as needed. It is not available for digital submission and must be submitted as a paper document by mail or direct submission.

3. Use of Information Technology

For the information collected on VA Form 21P-8416, VA does not currently use automated, electronic, mechanical, or other technological collection techniques. The form modifications are designed to accommodate these types of changes in the future. Discussions have started with contractors to meet this need.

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

Collecting information may require certification from an official of a small business (a care facility other than a nursing home or an in-home care provider). The certification appears on pages 9 and 10 of the form and is limited to the greatest extent possible. VBA estimates the time burden on the business official to be less than two minutes. VBA cannot properly determine a claimant's countable medical expenses without this certification. If the claimant does not intend to claim expenses for a care facility other than a nursing home or in-home care, the worksheets are not required.

6. Less Frequent Collection

VBA would be unable to properly administer needs-based benefits without this collection of information. The information is collected on an ad hoc basis and therefore cannot be collected less frequently. The form is designed to collect the minimum amount of information needed for VBA to properly administer the program.

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 Thursday, July 30, 2026. The 60-Day FRN citation is 91 FRN 47230.

1 comment was received during the 60-Day Comment Period.

PUBLIC SUBMISSION

As of: 8/19/26, 11:48 AM

Received: August 18, 2026

Status: Posted

Posted: August 19, 2026

Tracking No. msz-hiks-0mm

Docket: VA-2026-VACO-0001

Notices

Comment On: VA-2026-VACO-0001-0301

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Medical Expense Report [FR Doc No: 2026-15353; OMB Control No. 2900-0161]

Document: VA-2026-VACO-0001-0351

Comment from Reggie Greenwood on VA-2026-VACO-0001-0301

Submitter Information

Name: Reggie Greenwood

Address:

Tampa, FL, 33612

Email: ReggieMG@icloud.com

Phone: 8137129647

General Comment

I respectfully submit the following comments regarding the Veterans Benefits Administration's proposed extension of OMB Control No. 2900-0161, VA Form 21P-8416, Medical Expense Report.

1. Necessity and Practical Utility

The collection serves a legitimate and necessary function because unreimbursed medical expenses may materially affect countable income and eligibility or payment rates for needs-based VA benefits. Accurate collection of these expenses is therefore essential. However, VBA should periodically evaluate each requested data element to ensure it remains necessary for an identifiable adjudicative purpose and eliminate information that is duplicative, obsolete, or reasonably available from existing VA records.

2. Accuracy of the Burden Estimate

VBA estimates 60,000 annual respondents at 30 minutes each, producing 30,000 burden hours. The mathematical calculation is correct, but the underlying 30-minute assumption should be empirically validated. Completing the form may require respondents to locate medical bills, insurance statements, pharmacy records, mileage or transportation information, payment dates, and reimbursement records. The burden may be greater for older beneficiaries, caregivers, individuals reporting recurring expenses, and claimants with numerous providers. VBA should disclose the methodology and data used to establish the 30-minute estimate and consider whether record-retrieval and verification time is adequately represented.

3. Quality, Utility, and Clarity

VBA should improve the form and instructions by clearly distinguishing deductible from nondeductible expenses; explaining how reimbursements, insurance payments, recurring expenses, transportation costs, and expenses paid for household members should be reported; and providing concise examples for common situations. Definitions and terminology should align with governing eligibility rules. Electronic validation should identify missing or internally inconsistent entries before submission without preventing claimants from explaining unusual circumstances.

4. Minimizing Respondent Burden

VBA should expand secure electronic completion and submission, permit claimants to save and resume partially completed reports, support accessible mobile and desktop interfaces, and allow structured uploading of supporting documentation. Where legally and technically appropriate, known claimant information should be prepopulated rather than repeatedly requested. VBA should also examine whether information already maintained within VA systems can be reused, with appropriate consent, security, and verification controls.

Automation should reduce-not merely relocate-administrative burden. Claimants should retain a practical alternative submission method for those unable or unwilling to use electronic systems, and electronic processes should provide confirmation of receipt and a copy of the submitted information.

Given the scale of this collection, even modest reductions in average completion time could produce meaningful aggregate burden savings. I recommend that VBA continue the collection only with ongoing burden measurement, data minimization, clearer instructions, and expanded user-centered electronic processing consistent with the objectives of the Paperwork Reduction Act.

Veteran Affairs Response

Thank you for your comments on the 21P-8416 form. As we continue our efforts to simplify the application process for claimants, we appreciate the time and thought you put into providing

feedback. We remain committed to ensuring our forms are effective, accessible, and modernized. Thank you again for your engagement and support in enhancing this form.

A 30-Day Federal Register Notice for the collection published on Wednesday, October 28, 2026. The 30-Day FRN citation is 91 FRN 67913.

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.

12. Respondent Burden and its Labor Costs

- a. Number of Respondents is estimated at 60,000 per year.
- b. Frequency of Response is one time.
- c. Annual burden hours are 30,000 hours.
- d. The estimated completion time for this form is 30 minutes (0.50 hours).
- 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 \$979,800 (30,000 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	11.91	60,000	\$ 714,800.00
Overhead at 100% Salary							\$ 714,800.00
12	3	15	0.25	\$51.83	12.96	60,000	\$ 777,450.00
Overhead at 100% Salary							\$ 777,450.00
Processing / Analyzing Costs							\$ 2,984,500.00
Printing and Production Cost							\$ 33,161.11
Total Cost to Government							\$ 3,017,661.11

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 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.