

SUPPORTING STATEMENT - PART A

Income and Asset Statement in Support of Claim for Pension or Parent's Dependency and Indemnity Compensation (D.I.C.) – 2900-0829

Summary of Changes from Previously Approved Collection

- Extension of a currently approved collection
- The respondent burden has remained the same
- 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. 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-0969 will be used by claimants for VA Pension or Parents' Dependency and Indemnity Compensation (DIC) to provide information pertaining to income and assets to establish entitlement to Pension or Parents' DIC. This form will be completed only by those claimants who had income other than Social Security benefits during the calendar year before claiming benefits or who disposed of assets or have significant assets which may affect their entitlement to needs-based benefits.

3. Use of Information Technology

For the information collected on VA Form 21P-0969, VA does not currently use automated, electronic, mechanical, or other technological collection techniques. The form modifications are designed to be inclusive of these types of changes in the future.

VA Form 21P-0969 is available on the benefits.va.gov website in a fillable electronic format.

VBA is currently working on putting the technology in place to allow for the electronic submission and processing of the form. To ease the burden on respondents, VBA plans to develop and deploy functionality enabling electronic submission of this information. VBA cannot estimate the date this functionality will be deployed.

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

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 Friday, July 31, 2026. The 60-Day FRN citation is 91 FRN 48509.

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

General Comment

To Whom It May Concern:

I am submitting these comments in response to the Veterans Benefits Administration (VBA) request for public comment regarding the proposed extension of OMB Control Number 2900-0829, which covers VA Form 21P-0969 (Income and Asset Statement in Support of Claim for Pension or Parents' Dependency and Indemnity Compensation).

Please find my feedback regarding the specific evaluation criteria below:

1. Necessity and Practical Utility of the Information

The collection of this information is absolutely necessary for the proper performance of VBA's functions. Allowing claimants to accurately report unreimbursed medical expenses is critical to establishing eligibility and calculating correct benefit rates for needs-based programs like VA Pension and Parents' DIC. This form has clear, practical utility for Veteran Service Representatives as they determine income-based benefits.

2. Accuracy of the Burden Estimate

The estimate of 30 minutes per respondent appears optimistic given the population served. Claimants or their beneficiaries—often elderly individuals, surviving parents, or disabled veterans—frequently navigate complex medical billing histories. Gathering multiple receipts, tracking unreimbursed out-of-pocket costs, and matching them to financial statements can take significantly longer than 30 minutes, particularly for those without dedicated administrative support.

3. Ways to Enhance Quality, Utility, and Clarity

To improve the quality and clarity of the data collected, the VA should:

- Provide clear, interactive digital tooltips on the electronic version of the form to explicitly define what qualifies as an "unreimbursed medical expense."
- Include a simple, plain-language checklist on the first page outlining the exact supporting documentation needed (e.g., insurance explanations of benefits, pharmacy printouts).
- Format tables with auto-calculating totals for online submissions to minimize user calculation errors

before the form is finalized.

4. Ways to Minimize the Burden Through Technology

The burden on vulnerable individuals and households can be substantially reduced by:

- Allowing direct digital uploads of medical expense spreadsheets or pharmacy printouts to eliminate the need to manually transcribe every single line item into the form fields.
- Integrating secure data-sharing with Medicare or major healthcare networks (with claimant consent) to automatically populate known out-of-pocket medical expenses.
- Optimizing the digital form for mobile devices, as many claimants use smartphones rather than desktop computers to manage and photograph document receipts.

Thank you for the opportunity to comment on this information collection and for your ongoing efforts to streamline benefits for veterans and their families.

Sincerely, Concerned citizen

VA RESPONSE

Thank you for your comments on the 21P-0969 form renewal; we appreciate the time and effort you have put into providing feedback and suggestions.

We are continuing our efforts to simplify the application process and are working on solutions to reduce the burden on Veterans and Survivors seeking VA benefits.

Veterans Benefits Administration will review all public input received during the comment period, and if we need further clarification or information, we may reach out for additional input.

Thank you again for your engagement and support in enhancing the form.

General Comment

$55,000 \times 0.5 = 27,500$

VA RESPONSE

Thank you for your comments on the 21P-0969 form renewal.

Veterans Benefits Administration will review all public input received during the comment period, and if further clarification or information is needed, we may reach out for additional input.

A 30-Day Federal Register Notice for the collection published on Monday, October 19, 2026. The 30-Day FRN citation is 91 FRN 66202.

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 55,000 per year.
- b. Frequency of Response is one time.
- c. Annual burden hours are 27,500 hours.
- d. The estimated completion time for this form is 30 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 \$898,150 (27,500 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	55,000	\$ 655,233.33
Overhead at 100% Salary							\$ 655,233.33
12	3	15	0.25	\$51.83	12.96	55,000	\$ 712,662.50
Overhead at 100% Salary							\$ 712,662.50
Processing / Analyzing Costs							\$ 2,735,791.67
Printing and Production Cost							\$ 30,397.69
Total Cost to Government							\$ 2,766,189.35

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 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.