

The Veteran Benefit Desk

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Re: Income and Asset Statement in Support of Claim for Pension or Parents' Dependency and Indemnity Compensation (DIC)

OMB Control No.: 2900-0829

Federal Register Document: 2026-15453, published July 31, 2026

Regulations.gov Document ID: VA-2026-VACO-0001-0309

To the Department of Veterans Affairs:

The Veteran Benefit Desk is a veteran founded educational resource. We are not affiliated with VA, are not a law firm, and do not provide individualized legal, medical, or claims advice. We do not speak for all veterans.

We submit the following comments on VA Form 21P-0969.

1. Necessity and practical utility

We support collecting the financial information VA needs to decide these claims. However, the notice and the form describe different things.

The notice describes Form 21P-0969 as a way to report unreimbursed medical expenses. The form itself says it collects income and net worth information and directs people to Form 21P-8416 for medical expenses. [1,2]

Please correct the description and identify the form edition being renewed. We mention this because someone reviewing a medical expense collection would be evaluating a different task from the one this form asks people to complete. The notice should accurately describe the paperwork being reviewed.

2. Accuracy of the burden estimate

The notice lists 55,000 respondents, one response each, an average of 30 minutes, and 22,917 annual burden hours. Those numbers do not add up. [1]

At 30 minutes per response, the total would be 27,500 hours. The published total of 22,917 hours corresponds to approximately 25 minutes per response, allowing for rounding.

Please explain which figure is correct and make the next notice and supporting statement consistent.

Please also explain how VA developed the time estimate. Gathering records, reading instructions, checking answers, and submitting the form are part of the work, not just entering information. OMB's definition of burden includes those activities. [3]

We are not proposing a higher estimate without evidence. We ask VA to explain whether its estimate reflects the full task and whether it was tested with people completing the form without professional assistance.

VA's form page also instructs people reporting changes across multiple years to use a separate form for each year. Please explain whether the annual estimate accounts for people who need to submit more than one form. [4]

3. Quality, utility, and clarity

The November 2023 form has two specific instruction problems.

On page 2, the Section X instructions direct readers to Section VI for asset transfers, but asset transfers are in Section VII. Also, the Section XI instructions for an initial claim say “previous calendar years,” while question 11A on page 10 says “last full calendar year.” Please correct the section reference and make the reporting period consistent. [2]

Page 1 says Parents’ DIC claimants do not need to report or document their assets. Please make that instruction more prominent and clearly identify the questions about assets they can skip. Keep the distinction clear so that parents still answer the applicable income questions, including those involving income from assets. [2]

These may look like small wording issues, but someone completing the form alone should not have to decide which instruction to follow. A short explanation beside the affected questions would be more useful than adding several pages of general guidance.

4. Minimizing burden

VA already offers online submission through its form page. Please put that page’s address prominently in the paper instructions so someone handed a printed form can find the option. [4]

Keep a practical paper option as well. Any changes should help people complete the existing form, rather than require another worksheet or more paperwork to understand it.

When testing improvements, consider whether people know which questions apply to them and what records they need before they begin. Completing the form quickly is less helpful if the answers require another round of clarification afterward.

Thank you for reviewing these comments. We ask VA to correct the notice, reconcile the burden figures, and resolve the instruction problems so veterans and survivors can understand what is needed and provide it accurately.

Respectfully submitted,

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Sources

[1] Department of Veterans Affairs, Federal Register notice, July 31, 2026, 91 FR 48509-48510, Document 2026-15453.

[2] Department of Veterans Affairs, VA Form 21P-0969, November 2023 edition, pages 1, 2, and 10.

[3] 5 CFR 1320.3(b)(1), definition of burden under the Paperwork Reduction Act regulations.

[4] Department of Veterans Affairs, official VA Form 21P-0969 webpage, including instructions for reporting across multiple years and online submission.

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