SUPPORTING STATEMENT - PART A

Statement of Person Claiming to Have Stood in Relation of Parent – 2900-0059

Summary of Changes from Previously Approved Collection
• Extension of a currently approved collection • The respondent burden has remained the same • 4-public comments 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.

Title 38 U.S.C. 5101(a) provides that a specific claim in the form provided by the Secretary must be filed for benefits to be paid to any individual under the laws administered by the Secretary. 38 U.S.C. §1310 established Dependency and Indemnity Compensation (DIC), a benefit payable to the survivors of a Veteran who dies from a service-connected or compensable disability. 38 U.S.C. § 1315 established Dependency and Indemnity Compensation to parents (known as Parents' DIC). Parents' DIC is a monthly benefit payable to the surviving parent(s) of a deceased Veteran. The monthly benefit payable is dependent of the parent(s) based on the parent's (parents') annual income. An additional monthly amount is payable if the parent is a patient in a nursing home, blind, or so nearly blind or significantly disabled as to need or require the regular aid and attendance of another person. 38 CFR §3.59 defines the term "Parent" as "…a natural mother or father (including the mother of an illegitimate child or the father of an illegitimate child if the usual family relationship existed), mother or father through adoption, or a person who for a period of not less than 1 year stood in the relationship of a parent to a veteran at any time before his or her entry into active service."

2. Use of the Information

VA Form 21P-524 is used to gather the necessary information to determine a claimant's parental relationship to a deceased Veteran when the claimant is not the Veteran's natural mother or father or adopted mother or father. Without this information, determination of entitlement would not be possible.

3. Use of Information Technology

VA Form 21P-524 is available on the VA.gov 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

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 48510.

4 comments were received during the 60-Day Comment Period.

Submitter Information

Name: Reggie Greenwood

Address:

Tampa, FL, 33612

Email: ReggieMG@icloud.com

Phone: 8137129647

General Comment

Public Comment- 0MBControl No. 2900-0059, VA Form 21P-524

I support VBA's need to collect information necessary to determine whether an individual claiming benefits as a parent stood in the required parental relationship to a deceased Veteran. However, continued approval of VA Form 2 lP-524 should be accompanied by appropriate burden validation, data-quality controls, and modernization.

1. Necessity and Practical Utility

The collection appears necessary where existing government records do not establish a natural or adoptive parental relationship. VBA should ensure that each requested data element has a documented adjudicative purpose and is limited to information actually necessary to establish eligibility. Information already available to VA or another Federal agency should not be repeatedly requested from the claimant when it can lawfully and reliably be obtained through existing records.

2. Accuracy of the Burden Estimate

VBA estimates two hours per response for only 21 respondents annually. Given the relatively high individual burden, VA should explain the methodology supporting the two-hour estimate, including whether it accounts for time spent locating historical records, obtaining supporting statements or documentation, interpreting instructions, and correcting incomplete submissions. Actual completion-time data should be periodically evaluated rather than relying solely on historical estimates.

3. Quality, Utility, and Clarity

VA should use plain-language instructions that clearly explain the legal standard for a qualifying parental relationship, what evidence is required, which information is optional, and what alternative evidence may be submitted when traditional records are unavailable. The form should distinguish required adjudicative information from supplemental information and include examples addressing common claimant circumstances. These measures could reduce incomplete submissions, development letters, and processing delays.

4. Minimizing Respondent Burden Through Technology
VBA should provide a secure electronic submission option with conditional logic, prepopulation of information already held by VA, electronic document upload, save-and-return functionality, and validation checks that identify missing required fields before submission. A paper option should remain available for claimants who cannot reasonably use electronic services. VA should also avoid requiring claimants to resubmit documentation already contained in an accessible VA claims record.

Finally, because this collection involves information concerning family relationships and potentially sensitive personal circumstances, VBA should continue applying data-minimization, access-control, retention, and cybersecurity safeguards appropriate to the information collected.

I recommend continuation of OMB Control No. 2900-0059 provided VBA continues evaluating necessity at the data-element level, validates the two-hour burden estimate with empirical information where practicable, improves instructions and evidentiary guidance, and uses secure technology to reduce unnecessary claimant burden.

VA RESPONSE

Hello,

Thank you for your comments on the 21P 524 form. As we continue our efforts to simplify the application process for survivors, 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 Thursday, October 22, 2026. The 30-Day FRN citation is 91 FRN 66775.

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 21 per year.

b. Frequency of Response is one time.

c. Annual burden hours are 42 hours.

d. The estimated completion time for this form is 120 minutes (2 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 $1,371.72 (42 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	2 hrs	2.0	$35.74	11.91	21	$ 1,501.08
Overhead at 100% Salary							$ 1,501.08
12	3	1 hr 30 mins	1.50	$51.83	12.96	21	$ 1,632.65
Overhead at 100% Salary							$ 1,632.65
Processing / Analyzing Costs							$ 6,267.45
Printing and Production Cost							$ 69.64
Total Cost to Government							$ 6,337.09

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.