Supporting Statement - Part A

Mandatory Verification of Dependents
– Control #2900-0500

Summary of Changes from Previously Approved Collection

- The burden has increased since the previous approval due to the estimated number of receivables averaged over the past year.
- Two (2) comments have been 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. Information is requested by VA Form 21-0538, *Mandatory Verification of Dependents*, under the authority of Title 38 U.S.C. § 501 *Rules and* Regulations. Regulatory authority is found in 38 C.F.R. § 3.652 *Periodic Certification of Continued Eligibility*, that requires veterans to certify entitlement factors when requested, so VA can determine continued entitlement to the benefits being paid.

2. Use of the Information

The respondent population for VA Form 21-0538 is composed of individuals who are providing status of their dependents.

3. Use of Information Technology

VA Form 21-0538 is available on the One-VA Website in a fillable electronic format. VBA is currently hosting this form on a secure server and does currently have the technology in place to allow for the complete submission of the form. Validation edits are performed to assure data integrity.

Each Veteran is scheduled to receive the form on an approximate eight-year cycle. This cycle is based on VA's dependent verification review schedule, which is designed to periodically confirm continued eligibility for dependency related benefits. Veterans are placed into yearly cohorts based on the timing of their last dependency verification review. Each year, VA issues the form to the cohort due for reevaluation. This ensures all beneficiaries undergo verification at least once within the eight-year period, while distributing the workload consistently across years.

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

VA Form 21-0538 is used to request verification of the status of dependents for whom additional compensation is being paid to veterans. Without this information, determination of entitlement would not be continued.

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, August 13, 2026. The 60-Day FRN citation is 91 FRN 52402. Two (2) comments have been received during the 60-Day comment period.

Comment 1; https://www.regulations.gov/comment/VA-2026-VACO-0001-0338

Response 1; The comment was received on August 16, 2026, from Reggie Greenwood (no affiliation).

VBA appreciates the feedback on the proposed VA Form 21-0538.

We agree that verification should be narrowly tailored; VBA leverages existing VA and authorized Federal data sources and will continue to evaluate a risk-based approach, where appropriate, to minimize unnecessary contacts/solicitations to veterans.

VA will continue to clarify form instructions and notices (reportable changes, required documentation, response timelines) and maximize secure electronic submission through VA.gov—while maintaining paper alternatives and prepopulating fields when reliable data are available.

VA will not make changes to this form based on this comment.

Comment 2; https://www.regulations.gov/comment/VA-2026-VACO-0001-0436

Response 2; The comment was received on October 12, 2026, from an anonymous individual.

Correct. This notice regarding VA Form 21-0538 states it is a revision due to the increase in burden only.

No changes were made to the form's questions, fields, structure, or instructions. VA will not make changes to this form based on this comment.

A 30-Day Federal Register Notice for the collection published Thursday, November 19, 2026. The 30-Day FRN citation is 91 FRN 74677.

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 90 FR 44464 (September 15, 2025).

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

a. Total Number of Respondents is estimated at **138,197** per year.
Estimated electronic respondents: 15,229.
Estimated paper respondents: 122,968.

Note: Within the burden estimate, VA has separated out the paper and electronic burdens for tracking/informational purposes as we move to continue improving our electronic claims process. VA estimates that 12 percent of claims received are through the online electronic portal.

b. Frequency of Response is one time.

c. Annual burden hours are **23,033** hours.

d. The estimated completion time for this form is **10** 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 uses 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 $33.54 based on the BLS wage code – "00-0000 All Occupations." This information was taken from the following website: https://data.bls.gov/oes/#/area/0000000/2025.

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 $772,526.82 (23,033 burden hours x $33.54 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. Costs to the Federal Government

Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
7	3	10	0.17	$22.03	3.672	138,197	$ 507,413.32
Overhead at 100% Salary							$ 507,413.32
9	3	5	0.08	26.95	2.246	138,197	$ 310,367.43
Overhead at 100% Salary							$ 310,367.43
11	3	5	0.08	32.61	2.718	138,197	$ 375,550.35
Overhead at 100% Salary							$ 375,550.35
Processing / Analyzing Costs							$ 2,386,662.19
Printing and Production Cost							$ 26,518.47
Total Cost to Government							$ 2,413,180.66

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 2026 General Schedule (Base) Pay (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/GS_h.pdf). 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. Reason for Change in Burden

The burden has increased since the previous approval due to the estimated number of receivables averaged over the past year.

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.