

Supporting Statement for VA Forms 21-0781 and 21-0781a:
Statement in Support of Claim for Service Connection for Post-Traumatic Stress Disorder
(PTSD)

Statement in Support of Claim for Service Connection for Post-Traumatic Stress Disorder
(PTSD) Secondary to Personal Assault
(2900-0659)

A. Justification

1. 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. 38 U.S.C. 5103A provides that VA has a duty to assist claimants in obtaining evidence that is necessary to substantiate their claims, including relevant records when claimants have given VA sufficient information to locate such records. 38 U.S.C. 5107(a) provides that claimants have a responsibility to support a claim for benefits. 38 CFR 3.304(f) provides that service connection for post-traumatic stress disorder (PTSD) requires a medical diagnosis; a link, established by medical evidence, between current symptoms and an in-service stressor; and credible supporting evidence that the claimed in-service stressor occurred. When a veteran who did not serve in combat or was not a prisoner of war claims PTSD due to in-service stressors, there must be credible supporting evidence that the claimed stressors occurred.
2. VA Forms 21-0781 and 21-0781a are used to gather specific information about in-service stressors, so VA can assist claimants in obtaining credible supporting evidence that the claimed stressors occurred. In-service stressors reported by veterans must be verifiable. VA cannot thoroughly research military records and other sources of information for credible supporting evidence unless the veteran provides VA with specific information about the in-service stressors. The forms request information that is necessary to conduct meaningful research of records.
3. VA Forms 21-0781 and 21-0781a are available on the One-VA web site in a fillable electronic format. VBA is currently hosting these forms on a secure server and does not currently have the technology in place to allow for the complete submission of the forms. Validation edits are performed to assure data integrity. Efforts within VA are underway to provide a mechanism to allow the information to be submitted electronically with a recognized signature technology. There currently is no utility process in place that will allow the data submitted on the forms to be incorporated with an existing centralized legacy database.
4. Program reviews were conducted to identify potential areas of duplication; however, none were found to exist. There is no known Department or Agency which maintains the necessary information, nor is it available from other sources within our Department.
5. The collection of information does not involve small businesses or entities.

6. This form solicits information that is necessary to verify that in-service stressors occurred. The form is used only when VA is unable to concede in-service stressors due to combat service or former prisoner-of-war status. Without this collection of information, VA would not fulfill its statutory duty to assist claimants and would be unable to properly authorize benefits.
7. There is no special circumstance requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines.
8. The Department notice was published in the Federal Register on January 16, 2014, Volume 79, No. 11, pages 2941. One comment was received.

Comment:

Miss Doris Amelia Thomas is a veteran who has suffered significantly from Post Traumatic Stress Disorder due to Military Sexual Trauma. I submitted my claims to the Regional Philadelphia Veterans Administration since 2009. MISS DORIS AMELIA THOMAS SERVED IN THE MILITARY FROM 1992 THROUGH 1998. I SUBMITTED MY DD214 and significant medical evidence. I am still waiting for my claim to be approved. I am seeking retroactive back pay from the Philadelphia Veteran Medical Center. Miss Doris Amelia Thomas is still suffering. She has lost her home due to wrongful foreclosure and she is seeking a replacement home from the VA and JP Morgan Chase. Miss Doris Thomas has Major Depression Disorder, General Anxiety Disorder, PTSD and Military Sexual Trauma Disorder. Miss Doris Amelia Thomas have several doctors from the VA Medical Center and several medical opinions which verify my claim for service connection for Major Depression, Anxiety Disorder, and Post Traumatic Stress Disorder from the University of PA. Furthermore, she has written to the VA about establishing my disability compensation from the Veteran Administration. I have been requesting my VA Disability compensation, VA pension, and Housing Replacement.

Response to Comment:

We received and considered your comments regarding the proposed information collection for VA-2014-VACO-0001-0033 (Statement in Support of Claim for Service Connection for Post-Traumatic Stress Disorder).

Under the Paperwork Reduction Act (PRA) of 1995, VA is required to publish notice in the Federal Register (FRN) concerning each proposed collection of information. This published notice requests information on;

- 1) Whether the proposed collection of information is necessary for the proper performance of VBA's functions, including whether the information will have practical utility;
- 2) The accuracy of VBA's estimate of the burden of the proposed collection of information;

- 3) Ways to enhance the quality, utility, and clarity of the information to be collected; and
- 4) Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or the use of other forms of information technology.

This notice solicits comments for the information collection notice, (taken directly from the FRN), on information needed to obtain evidence to substantiate claims for service connection for post-traumatic stress disorder (PTSD). We appreciate the time you have taken to review and comment on our proposed information collection. However, your comments are specifically about your claim for Post-Traumatic Stress Disorder due to Military Sexual Trauma, which we do not take lightly, but are not generally related to this information collection.

If you have further questions or comments regarding your specific claim for PTSD, please contact your local VA Regional Office by:

- Internet: <https://iris.va.gov>
- In person: You can locate the address of the closest regional office on the website <http://www.va.gov/directory> or in your telephone book blue pages under "United States Government, Veterans"
- Telephone: Please call one of the following telephone numbers: 1-800-827-1000. The hearing impaired Federal Relay number (TDD) is 711.

Thank you for your service.

9. No payments or gifts to respondents have been made under this collection of information.
10. The records are maintained in the appropriate Privacy Act System of Records identified as "Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records-VA (58VA21/22/28)," published at 74 FR 29275 on June 19, 2009, and last amended at 77 FR 42593 (July 19, 2012).
11. There are no questions of a sensitive nature.
12. Estimate of Information Collection Burden.
 - a. Number of Respondents is estimated at 15,240 per year:
 - i. 14,400 for VA Form 21-0781, and
 - ii. 840 for VA Form 21-0781a.
 - b. Frequency of Response is one time for most beneficiaries.
 - c. Annual burden is 17,780 hours.
 - d. The estimated completion time of 70 minutes is based on review by staff personnel.

- e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost of the respondent is \$24, making the total cost to the respondents an estimated \$426,720. (17,780 burden hours x \$24 per hour).

13. This submission does not involve any recordkeeping costs.

14. Estimated Costs to the Federal Government:

- a. Processing/Analyzing costs \$470,979

 (GS-12/5 @ \$40.66 x 15,240 x 30/60 minutes = \$309,829)
 (GS-9/5 @ \$28.04 x 15,240 x 20/60 minutes = \$142,443)
 (GS-3/5 @ \$14.73 x 15,240 x 5/60 minutes = \$ 18,707)
- b. Production cost \$200
- c. Total cost to government \$471,179

15. There is no change in the reporting burden. The expiration date placeholder has been added to the forms.

16. The information collection is not for publication or tabulation use.

17. We are not seeking approval to omit the expiration date for OMB approval.

18. This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

This collection of information does not employ statistical methods.