



# Servaes Consulting Group, LLC



365 Boston Post Road #390

Sudbury, Ma 01776

508 270-7556

*With VA accredited individuals to serve you better*

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**Re: OMB Control No. 2900-0002**

**Proposed Information Collection: Income, Net Worth and Employment Statement (in Support of Claim for Total Disability Benefits) and Application for Pension**

I am surprised, after the VA suspended the annual Eligibility Verification Report (Annual EVR) requirement on December 20, 2012, to see the following in this notice

*Frequency of Response: Annually.*

The VA's reasoning for discontinuing the use of Annual EVRs was that

*"Technological improvements, including expansion of data matching agreements with the Internal Revenue Service and Social Security Administration, will allow VA to verify pension applicant's income before awarding benefits. VA will continue to conduct data matching with these and other Federal agencies after awarding benefits to ensure that it is making benefit payments only to Veterans and survivors who remain eligible."*

What has changed that the VA now feels the need to require **even more** reporting from veterans and surviving spouses than was required under the Annual EVR model?

Since the annual EVR was eliminated the VA has been working with the Internal Revenue Service (IRS) and the Social Security Administration (SSA) to verify continued eligibility for pension benefits. Will that process now be cut?

Please provide a cost benefit analysis including:

1. The impact of doing away with the annual EVR process and verification with the IRS and SSA and why this change is needed
2. Assuming a change is now needed, the cost savings of requiring the more voluminous 21P-257 or 21P-527EZ versus the 21-0966 EVR when all of the changes necessary to evaluate pension eligibility are included in the much shorter EVR.
3. Cost of the Estimated Annual Burden: 84,708 hours versus dollars saved.

Assuming that the Annual reporting Requirement is reinstated, will this be considered a Reopening of the Claim where the Veteran will be required to be in compliance with the then current VA regulations? **e.g.** If the VA is successful in eliminating Independent Living for Veterans whose Physician's attest that they are unsafe to live at home and require facility living in order to arrange for assistance for another person with at least two activities of daily living, as proposed under A073, will filing the Annual 21-527 result in the veteran no longer being able to deduct the Independent Living fee as a medical expense as he was allowed to under FAST 12-23 at the time he was granted the award?

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