

## Supporting Statement for Reporting Any Adverse Change in a Beneficiary's Circumstances

### A. Justification

1. The Department of Veterans Affairs (VA), through its Veterans Benefits Administration (VBA), administers the Fiduciary Program. The Fiduciary Program provides oversight to VA beneficiaries who, because of injury, disease, the infirmities of advanced age, or minority are unable to manage their VA benefits. VA is requiring fiduciaries to report any changes in the beneficiary's circumstances which might adversely impact the beneficiary's well-being.
2. VA would not use a form to collect this information. Fiduciaries would be required to report any change in circumstances telephonically or in writing upon any change. Fiduciaries would be instructed at the time of appointment or finalization of the new proposed rule, of the requirement to report the changes at the occurrence.
3. This collection of information would not involve the use of automated, electronic, mechanical, or other technological collection techniques or other form of information technology.
4. This is a new collection of information. VA has no similar information already available that could be used for the collection of this information.
5. This collection of information would not impact small businesses or other small entities.
6. The VA Fiduciary Program would need this information for the purposes of coordinating a proper response to the beneficiary's benefit or other needs, to include referral to Veteran Health Administration or other public or private agencies for delivery of services.
7. There is no special circumstance requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines.
8. This information collection notice was included in a notice of proposed rulemaking published in the Federal Register on January 3, 2014, at 79 Fed. Reg. 430 .
9. No payments or gifts to respondents have been made under this collection of information.
10. The records are maintained in VA's system known as Virtual VA. Any disclosures of information obtained in this collection are made pursuant to the provisions of the Privacy Act, 38 U.S.C. § 5701, and 38 U.S.C. § 7332.
11. There are no questions of a sensitive nature.
12. Estimate of Information Collection Burden.

- a. Number of Respondents is estimated at 37,500 per year.
- b. Frequency of Response is once per year.
- c. The VA estimates that respondents will spend approximately 3 minutes to notify the VA of changes in beneficiary circumstances. Annual burden is 1,875 hours.
- d. The estimated additional burden is based on the estimated percentage of current beneficiaries who may experience a change in circumstances requiring the fiduciary to notify the VA.
- e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the median hourly earnings (all employees) of respondents is \$24. The total cost to the respondents is estimated at \$45,000 (1,875 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	\$138,169.00
GS- 10/5 @ \$30.88 x 37,500 x 3 minutes = \$57,900.00	
GS- 9/5 @ \$28.08 x 37,500 x 3 minutes = \$52,650.00	
GS- 3/5 @ \$14.73 x 37,500 x 3 minutes = \$27,619.00	
b. Printing and Production costs	\$0.00
c. Total Cost to the government	\$138,169.00

15. There are no program changes for adjustments.

16. The information collection is not for publication.

17. No form is required.

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

**B. Collection of Information Employing Statistical Methods**

The Veterans Benefits Administration does not collect information employing statistical methods.