

Supporting Statement for VA Form 21P-4709  
Certificate as to Assets  
(2900-0107)

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. 5502(b) requires VA supervision of benefits paid to fiduciaries on behalf of beneficiaries who are incompetent or under legal disability. Supervision includes a requirement that the fiduciary account periodically for the funds he/she has received. Accountings may also be required by State laws as well as Federal law and regulations. Regulatory authority is found in 38 CFR 13.100 and 13.104. The expiration date is being added to the form. The form has been transferred from Compensation Service to Pension and Fiduciary Service. Due to a change in business lines, the prefix on the form has been changed from 21 to 21P.
2. VA Form 21P-4709 is used to verify investments in savings, bonds, and other securities reported by the fiduciary as part of the beneficiary's estate. The information is used by estate analysts employed by VA to audit accountings of fiduciaries.
3. VA Form 21P-41709 is available on the One-VA 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. 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 form 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. This collection involves small businesses only to the extent that a professional guardianship service or a professional guardian who is incorporated has been recognized by VA as the fiduciary for an individual VA beneficiary. The form is available on the One-VA web site in a fillable electronic format. There is no major impact on these entities.
6. This form is used only in connection with accountings by fiduciaries of beneficiaries' funds. Without verification of assets allegedly purchased by the fiduciary on behalf of the VA beneficiary, audits would be less useful in preventing waste, fraud and abuse. Less frequent collection of the information would result in increased vulnerability of beneficiaries' funds.
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 June 12, 2014, Volume 79, No. 11, pages 33804-33805. No comments were received in response to this notice.

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 37VA27, "VA Supervised Fiduciary and Beneficiary Records - VA" as set forth in Privacy Act Issuances, 2001 compilation.

11. There are no questions of a sensitive nature.

12. Estimate of Information Collection Burden.

a. Number of Respondents: 4,316

b. Frequency of Response: Annually for the majority of beneficiaries.

c. Annual Burden Hours: 863 Burden Hours

d. Estimated Completion Time: 12 Minutes

e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24, making the total cost to the respondents an estimated \$20,712. (863 burden hours x \$24 per hour).

13. This submission does not involve any recording keeping costs.

14. Estimated Costs to the Federal Government:

a. Processing/Analyzing costs \$ 12,360

(GS-9/5 @ \$26.13 x 4,316 x 5/60 minutes = \$ 9398)

(GS-3/5 @ \$13.73 x 4,316 x 3/60 minutes = \$ 2962)

b. Printing and production cost \$0.00

c. Total cost to government \$12,360

15. There is no change in respondent burden. The expiration date is being added to the form.

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.