

Supporting Statement for VA Forms
21P-4706b, Federal Fiduciary's Account
21P-4706c, Court Appointed Fiduciary's Account
21-4718a, Certificate of Balance on Deposit
and Authorization to Disclose Financial Records
(2900-0017)

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

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 currently uses VA Forms 21P-4706b and VA Form 21P-2706c for fiduciaries to submit their annual accountings. VA currently uses VA Form 21P-4718a, as evidence and disclosure to support the accountings submitted by fiduciaries.

2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.

VA Form 21P-4706b, 21P-4706c, and 21P-4718a will be completed by VA-appointed fiduciaries of VA beneficiaries. The information will be used by VA fiduciary hub staff to determine whether an individual is an appropriate fiduciary and properly using and maintaining an accounting of the VA beneficiaries compensation or pension payments. VA continues to use the information provided on these forms in the oversight of VA-appointed fiduciaries.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also described any consideration of using information technology to reduce burden.

VA Form 21P-4706b and 21P-4718a are available on the One-VA web site in a fillable electronic format. VA Form 21P-4706c requires a sworn signature, therefore it is not available in the fillable electronic format. VBA is currently hosting forms on a secure server and does not currently have the technology in place to allow for the complete submission of the VA Form 21P-4706c. Validation edits are performed to assure data information to be submitted electronically with a recognized signature technology. There currently is no utility process in place that will allow the date submitted on the form to be incorporated with an existing centralized legacy database. Veterans Online Applications (VONAPP) allows applicants to view, print, and submit applications electronically to VBA. However, VA Form 21P-4706b, 21P-4706c, and 21P-

4718a are not forms scheduled to be added to VONAPP. The Department will reconsider adding the form to VONAPP when the resources become available.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

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. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The collection of information does not involve small businesses or entities.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

These forms are used for VA-appointed fiduciaries to submit their accountings. Without the collection of this information, VA may be negligent in overseeing fiduciaries it appoints to manage a beneficiary's VA benefits.

7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OMB.

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines of 5 CFR 1320.6.

8. a. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

The Department notice was published in the Federal Register on June 18, 2019, on pages 28395 and 28396.

VA received one comment regarding the inquiry and investigation into fiduciary appointments. The comment was unrelated to the form and did not provide any material improvements or suggestions for form updates.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts to respondents have been made under this collection of information.

10. Describe any assurance of privacy to the extent permitted by law provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

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. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

12. Estimate of the hour burden of the collection of information:

Estimate of Information Collection Burden.

a. Number of Respondents is estimated at 33,500 per year for all three forms.

VA Form 21-4706b is estimated at 28,000 per year
VA Form 21-4706c is estimated at 5,500 per year
VA Form 21-4718a is estimated at 33,500 per year

b. Frequency of Response will be annually.

c. Annual burden is 17,025 hours.

VA Form 21-4706b is estimated at 12,600 hours
VA Form 21-4706c is estimated at 2,750 hours
VA Form 21-4718a is estimated at 1,675 hours

d. The estimated completion time of each form is as follows:

VA Form 21-4706b is 27 minutes
VA Form 21-4706c is 30 minutes
VA Form 21-4718a is 3 minutes

Average Total Burden per Respondent: 20 minutes

These estimates are based on review by staff personnel and previous usage of this form.

e. The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean weekly earnings of full-time wage and salary workers are \$999.20. Assuming a forty (40) hour work week, the mean hourly wage is \$24.98 based on the BLS wage code – “00-0000 All Occupations.” This information was taken from the following website: (https://www.bls.gov/oes/current/oes_nat.htm, May 2018).

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 **\$836,830**. (33,500 burden hours x \$24.98 per hour).

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- a. There is no capital, start-up, operation or maintenance costs.
- b. Cost estimates are not expected to vary widely. The only cost is that for the time of the respondent.
- c. There is no anticipated capital start-up components or requests to provide information.

14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Estimated Costs to the Federal Government:

Grade	Step	Burden Time	Hourly Rate	Cost Per Response	Total Responses	Total
10	5	30	\$34.39	\$ 17.195	28,000	\$ 481,460.00
Overhead at 100% Salary						\$ 481,460.00
9	5	27	\$31.23	\$ 14.053	5,500	\$ 77,294.25
Overhead at 100% Salary						\$ 77,294.25
3	5	3	\$16.41	\$ 0.820	33,500	\$ 28,717.50
Overhead at 100% Salary						\$ 28,717.50
Overhead costs are 100% of salary and are same as the wage listed above and the amounts are included in the total.						
Processing / Analyzing Costs						\$587,471.75
Printing and Production Cost						\$0.00
Total Cost to Government						\$587,471.75

Note: the hourly wage information above is based on the hourly 2019 General Schedule (Base) Pay (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2019/general-schedule/>). 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. Explain the reason for any burden hour changes since the last submission.

This submission reports a decrease of burden hours since the last submission. The decrease in burden hours is based on the Fiduciary Program policy changing the types of fiduciary appointments the program deems acceptable; Court-appointed fiduciaries are no longer recognized by the program. At this time, those fiduciaries appointed by VA and also by a State court may still submit a VA Form 21P-4706c. No changes to the forms are necessary due to the program allowing the submission of all three forms.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The information collection is not for publication or tabulation use.

17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We are not seeking approval for omission of expiration date.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.

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

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

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