

# WHITE PAPER

## Expiration of VA Forms 21P-4706b, 21P-4706c and 21P-4718a

### Issue:

VA Forms 21P-4706b, 21P-4706c, and 21P-4718a (Accounting Forms) expired on July 31, 2019.

### Background:

44 U.S. Code § 3501- 3521, instituted the Paperwork Reduction Act, designed to reduce the total amount of paperwork burden the federal government imposes on private businesses and citizens. The Act imposes procedural requirements on agencies that wish to collect information from the public. The Paperwork Reduction Act mandates that all federal government agencies receive approval from OMB—in the form of a "control number"—before promulgating a paper form, website, survey or electronic submission that will impose an information collection burden on the general public. The term "burden" is defined as anything beyond "that necessary to identify the respondent, the date, the respondent's address, and the nature of the instrument." No one may be penalized for refusing an information collection request that does not display a valid control number. Once obtained, approval must be renewed every three years. A brief outline of the process is as follows.

The Publications Control Officer in each business line creates an Information Collection Request in Regulatory Information Service Center (RISC) and Office of Information and Regulatory Affairs (OIRA) Combined Information System (ROCIS). To support the creation of the request, uploaded into the system are the Supporting Statement, 60-day Federal Registry Notice and 30-day Federal Registry Notice. Once in the ROCIS system, VBA Forms Managers review the requests to ensure everything is correct and all information is reported. VBA Forms Managers then submit the request to VA Clearance Officer for approval and submission to Office of Management and Budget (OMB), at which point the notice process begins. Each Information Collection Request requires both a 60-day and 30-day comment period from the public prior to completion. After the notices are published and comments addressed, OMB completes the final approval process and notifies VA the forms are approved, at which time the VBA Forms Managers add the updated form to the form's website. The overall process takes from 8-10 months start to finish.

### Discussion:

The Accounting Forms, were last renewed in July 2016, as indicated in the background section, all forms required to be completed by the public must be renewed every 3 years. Fiduciary service, at the time of renewal, had numerous high priorities to accomplish, to include implementation of required congressional regulation updates. Fiduciary service prioritized responsibilities and the renewal of the form was seen as

something that could be put on hold for a short time period. In addition to the competing priorities, VA Fiduciary Service was understaffed and did not have the employees to ensure all essential job functions were completed.

**Conclusion:**

The Accounting Forms of fiduciary service were allowed to expire on July 31, 2019, however the forms were submitted as soon as time and staffing levels permitted. Fiduciary service recognized the implications of failure to timely renew the forms and determined other program needs took precedence over form renewal. As soon as possible fiduciary service took action to remedy the issue.