

Supporting Statement - Part A

*VA Fiduciary's Account
Court Appointed Fiduciary's Account
Certificate of Balance on Deposit and Authorization to Disclose Financial Records*

Control #2900-0017

Summary of Changes from Previously Approved Collection

- No changes have been made to this form.
- This ICR is being submitted as a revision. The respondent burden has decreased due to the estimated number of receivables averaged over the past year.
- No comments were received during the 60-day public comment period.

1. Need for the Information Collection

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 survivors. Information is requested by 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. Regulatory authority is found in 38 USC 5502 and PL: Pub.L. 108-454, Sec 502-504.

2. Use of the Information

VA-appointed fiduciaries of VA beneficiaries will complete VA Form 21P-4706b, 21P-4706c, and 21P-4718a. 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 beneficiary's compensation or pension payments. VA continues using the information on these forms to oversee VA-appointed fiduciaries.

3. Use of Information Technology

VA Form 21P-4706b and 21P-4718a are available on the VA website in a fillable electronic format. VA Form 21P-4706c requires a sworn signature; therefore, it is unavailable in the fillable electronic format. VBA is currently hosting forms on a secure server and does not have the technology to allow for the complete submission of the VA Form 21P-4706c. Validation edits ensure that data information is submitted electronically with a recognized signature technology. There currently is no utility process that will allow the date submitted on the form to be incorporated with an existing centralized legacy database.

4. Non-Duplication

The information obtained through this collection is unique and not available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

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6. Less Frequent Collection

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

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Friday, July 19, 2024. The 60-Day FRN citation is 89 FRN 58882.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Friday, September 20, 2024. The 30-Day FRN citation is 89 FRN 77240.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

The records are maintained in the appropriate Privacy Act System of Records identified as "Compensation, Pension, Education, and Veteran Readiness and Employment Records-VA (58VA21/22/28)," published at 74 FR 29275 on June 19, 2009, and last amended at 87 FR 8740 (February 16, 2022).

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11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

- a. Number of Respondents is estimated at 30,000 per year.
- b. Frequency of Response is one time.
- c. Annual burden hours are 10,000 hours per form.
- d. The estimated completion time of each form in this collection is as follows:
 - VA Form 21P-4706b is 27 minutes
 - VA Form 21P-4706c is 30 minutes
 - VA Form 21P-4718a is 3 minutes
- e. VA cannot make further assumptions about the population of respondents because of the variability of factors such as the educational background and wage potential of respondents. Therefore, VBA used general wage data to estimate the respondents' costs associated with completing the information collection.

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean hourly wage is \$31.48 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.

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 \$944,400 (30,000 burden hours x \$31.48 per hour).

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

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14. Cost to the Federal Government

Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
9	3	20	0.33	\$26.24	8.747	30,000	\$ 262,400.00
Overhead at 100% Salary							\$ 262,400.00
12	3	15	0.25	\$38.05	9.513	30,000	\$ 285,375.00
Overhead at 100% Salary							\$ 285,375.00
Processing / Analyzing Costs							\$ 1,095,550.00
Printing and Production Cost							\$ 12,172.78
Total Cost to Government							\$ 1,107,722.78

Overhead costs are 100% of salary and are the same as the wage listed above and the amounts are included in the total.

Printing and production costs approximates the cost of printing this information collection per year. (Processing/Analyzing Cost total divided by \$90).

Note: The hourly wage information above is based on the hourly 2024 General Schedule (Base) Pay ([Pay & Leave : Salaries & Wages - OPM.gov](https://www.opm.gov/policy-data-oversight/salaries-grades/)). 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. Reasons for Change in Burden

The burden has decreased since the previous approval due to the estimated number of receivables averaged over the past year.

16. Publication of Results

The results of this information collection will not be published.

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17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.