

Supporting Statement for VA Form 21-P-4706b
Federal Fiduciary Account
(2900-0017)

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 currently uses VA Form 21P-4706b for fiduciaries to submit their annual accountings. As a result of proposed rule 2900-AO53, this collection of information includes not only the submission of accountings to VA, but also disclosure to the beneficiary.

2. VA uses Form 21P-4706b, *Federal Fiduciary's Account*, for fiduciaries to submit their accountings of VA beneficiaries' benefits they manage. Consistent with proposed rules, VA is now requiring VA appointed fiduciaries to provide a copy of their accountings to beneficiaries as well.

3. VA Form 21-4706b is available on the One-VA web site in a fillable electronic format. VA Form 21-4706b require a sworn signature, therefore it is not available in the fillable electronic signature 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 form. 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 21-4706b is not scheduled to be added to VONAPP. The Department will reconsider adding the form to VONAPP when the resources become available.

4. Program reviews were conducted to identify potential areas of duplication; none were found to exist. There is no known Department or Agency which maintains the necessary information to ensure this protection to VA beneficiaries, nor is that information available from any other sources within our Department.

5. This collection of information would not impact small businesses or other small entities.

6. This form is 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. There is no special circumstance requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines.

8. The 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 the appropriate Privacy Act System of Records identified as "Compensation, Pension, Education, and Rehabilitation Records—VA (58VA21/22/28)" as set forth in Privacy Act Issuances, 1993 compilation found in 74 Fed. Reg. 29275 (June 19, 2009).

11. There are no questions of a sensitive nature.

12. Estimate of Information Collection Burden.

a. Number of Respondents is estimated at 38,000 per year this form.

VA Form 21-4706b is estimated at 38,000 per year Increase in respondents is do to a change in population, created by the addition of previous court appointments changed to federal fiduciaries.

b. Frequency of Response is once per year.

c. Annual burden is 17,100 hours.

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

VA Form 21-4706b is 27 minutes

This estimate is based on review by staff personnel and previous usage of this form

e. The estimated additional time to provide the beneficiary with a copy of this form is 2 minutes. Annual burden is 1,267 hours.

f. 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 \$440,808 (17,100 + 1,267 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 \$1,094,191

GS-10/5 @ \$30.88 x 38,000x 30 minutes = \$586,720

GS-9/5 @ \$28.04 x 38,000x 27 minutes = \$479,484

GS-3/5 @\$14.73 x 38,000x 3 minutes = \$27,987

- b. Printing and production cost \$750
- c. Total cost to government \$1,094,191

15. Respondent number has increased do to an increase in the population served and change of court appointments to federal fiduciary, thusly requiring them to account on this form. Additionally based on a proposed regulatory change, a fiduciary will be required to provide a copy of the annual accounting to the beneficiary.

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

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