## Pension and Fiduciary Service



Accounting & Fund Usage Review Reminders



March 2024

This job aid will assist hub employees with ensuring the entire financial oversight process is fulfilled.

Due date established and/or properly updated for all fiduciaries required to account	
Beginning and/or ending date of next accounting period correct	
beginning analor chang date of flext accounting period correct	Ц
2. All financial accounts, U.S. savings bonds, and other securities properly verified	
Previously recognized court-appointed fiduciary required to register investment obtained after 08/13/2018 to denote fiduciary relationship	
All known financial accounts and funds under management verified	
U.S. savings bonds purchased with VA funds verified via <u>U.S.</u> <u>Department of Treasury website</u> .	
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3. Appropriate actions taken for final accounting	
Established EP 290 when final accounting required with appropriate suspense date	
Notified fiduciary of final accounting requirement with appropriate due date	
Notified all next of kin (NOK) with fiduciary's contact information	
Removed requirement to provide beneficiary copy of accounting approval notification letter	
Notified fiduciary to return funds under management within 30-days due to escheat	
4. Accounting fully and properly audited	
Accounting Audit Tool available in record to document audit prior to approval/disapproval of accounting	
Accounting starting balance correct	
Unusual or inappropriate expenses appropriately clarified and/or documented in notes section of Accounting Audit Tool	
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5. Proper authorization received to obtain credit report	
Fiduciary initialed Background Information block on <i>VA Form 21P-4706b</i> .	
Fiduciary signed <i>VA Form 21P-4703</i> , with a version date of November 2017 or later	
If Fiduciary signed VA Form 21P-4703 with a version date prior to November 2017, then VA Form 27-0820 is of record with fiduciary's authorization	
6. Income reported by fiduciary properly verified	
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7. Fiduciary properly authorized to collect fee	
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8. All excessive/unauthorized fees reimbursed to beneficiary's funds under management prior to accounting approval	
Fiduciary met all appropriate financial account requirements	

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10. Account balance appropriately reconciled prior to accounting approval	
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11. All new and existing surety bonds appropriately verified and adjusted prior to accounting approval when VA funds under management exceeded \$25,000	
Fiduciary notified to obtain corporate surety bond when VA FUM exceeded \$25,000	
Bond section in Accounting Audit Tool completed to indicate verification of new or existing surety bond	
Fiduciary notified to increase surety bond when difference of more than 20% between bond amount and current VA FUM	
Fiduciary informed to decrease surety bond when difference of more than 20% between bond amount and current VA FUM	
Appropriate documentation of adequate bonding in eFolder	
12. Authorized withdrawal agreement in place and signed by all three parties	
Current withdrawal agreement in eFolder	
Current withdrawal agreement signed by all three parties	
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13. All requirements met prior to accounting being approved	
Accounting NOT approved without receipt of complete VA Form 21P-4706b, VA Form 21P-4706c and/or financial statements for entire accounting period	
Credit report obtained and reviewed, if applicable	
Differences in amounts listed on accounting form can be resolved by determining that unaltered financial documentation or receipts contain correct amounts	
Financial accounts properly titled	
Accounting approved without outstanding corrections due by fiduciary	
Accounting NOT approved when evidence exists showing fiduciary has misused beneficiary's funds	
14. Disposition of the accounting correct	
Valid grounds for disapproving accounting.	
Detailed explanation of any resolved discrepancies noted in NOTES section of Accounting Audit Tool prior to approval	
Fund usage review follow-up scheduled if fiduciary no longer meets accounting requirement	
15. Accounting or fund usage review (FUR) requirement appropriately waived	
Accounting or FUR waived when requirements met, or accounting or FUR requirement appropriately waived	
Did NOT utilize fund usage review in lieu of accounting requirement	

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16. Benefits appropriately suspended, if necessary	
Allegation of misuse warranted and documented in file	
Fiduciary evasive when attempting to clarify information during	
accounting process	
Financial statements show signs of alterations	
Fiduciary demonstrated written or verbal intent not to comply with VA	
request	
Beneficiary or fiduciary whereabouts unknown	
17. Misuse allegation established if there is evidence from	
fiduciary or through discovery that accounting cannot be	
approved or obtained	
Accounting EP cancelled and EP 290 FID-Misuse established when	
red flag indicators of misuse not resolved	
EP 590-Successor Initial Appointment Field Exam to replace the	
fiduciary established	
EP 590 updated to indicate need to suspend benefit payments or	
routed to FSR for action	
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18. Fund usage field exam requested to obtain required	
documents, determine if allegation of misuse warranted, and	
determine if fiduciary should remain in place  Fund usage field exam requested after all attempts to obtain missing	
accounting documents exhausted	
Fiduciary's request for extension documented or uploaded to eFolder	
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19. Fund usage field exam requested when fiduciary indicated	T <sub>□</sub>
they require assistance completing accounting and assistance	
cannot be accomplished over phone	
Fiduciary's request for assistance uploaded to eFolder	
Fiduciary's request for assistance documented on <i>VA Form 27-0820</i>	
(if received verbally)	
VA Form 21-3537a completed or uploaded to eFolder	
Fund usage field examination EP established	
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20. All FUR processes and requirements met if FUR completed	
Did NOT grant extension of more than 14 days from date of Fund	
Usage Past Due Letter for fiduciary to provide fund usage report	
Made telephone contact with fiduciary to notify of extension	
Took action to establish misuse allegation when appropriate	
Took action to establish appropriate fund usage follow-up field exam	
EP 590 so that FE can resolve any fund usage issues	
Sent second FUR letter after date past due	
Made telephone contact with fiduciary when FUR past due	
Made telephone contact with fiduciary to complete FUR due to	
missing or incomplete information	

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21. All required elements of FUR received prior to completion	
Received all financial institution statements for previous three-month	
FUR period	
Received receipts or invoices for irregular purchases	
Verified financial statements are properly titled	
Followed guidance to request additional or corrected FUR information	
22. Systems and profiles correctly updated and/or required	
documentation uploaded to the eFolder	
Required tasks established and/or updated	
Required documents uploaded to eFolder	
Beneficiary and/or fiduciary profile properly updated	
Accounting/FUR diary dates properly updated in and/or removed	
from beneficiary profile	
Notification letter sent and included all notification letter requirements	
Documented all required elements of telephone conversation with	
fiduciary on VA Form 27-0820, Report of General Information	
Accounting Audit Tool updated to reflect accounting approval	