***Introduction to the***

***Fiduciary Process***

***Particpant Guide***

**National Contact Center New Hire Challenge Training**

OTED Training

**Duration:**  1.5 hour

**TMS:**  **VA 4644619**

**Audience:** This lesson is intended for new hire Public Contact Representatives (PCRs) within VBA’s National Contact Centers (NCCs) however, it is also suitable for any new or experienced VA employee desiring information on this subject.

**Purpose:** This lesson provides VA employees assisting the public with an opportunity to enhance their knowledge on this topic. It fulfills the training requirements outlined in the Standard Operating Procedures (SOP) for new hires in the National Training Curriculum (NTC).

**Objectives:** Upon completing this lesson, trainees will be able to:

* Describe the purpose of the VA fiduciary program
* Understand the incompetency process using the Fiduciary Flowchart
* Name the Fiduciary Hub roles and responsibilities during the incompetency process
* Apply the appropriate procedural guidance for fiduciary-related issues

**References:**

**KM ARTICLE**

* [End Product Guidance](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001001/content/554400000004862/End-Product-Guidance)
* [Fiduciary Referral Procedures](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001001/content/554400000011151/Fiduciary-Referral-Procedures?query=Fiduciary)
* [Fact Sheets - Fiduciary](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001001/content/554400000008825/Fact-Sheets-Fiduciary?query=Fiduciary)
* [Fiduciary Program Ready Reference](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001001/content/554400000004225/Fiduciary-Program-Ready-Reference?query=Fiduciary)
* [Fiduciary Intranet Webpage](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001030)
* [Fiduciary Hub Referrals](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001001/content/554400000008846/Fiduciary-Hub-Referrals?query=Fiduciary)
* [Brady Bill FAQs](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001001/content/554400000003287/Brady-Bill-FAQs)
* [Incompetency Flowchart](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001001/content/554400000004224/Incompetency-Flowchart?query=fiduciary)

**Fiduciary KM**

* [Fiduciary Live Manual](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001030/topic/554400000002708/Fiduciary-Program-Manual)
* [1.A Definitions for Program Purposes](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001030/content/554400000153945/FPM-Part-I-Chapter-1-Section-A-Fiduciary-Hub-Hub-Structure)
* [1.B Job Functions and Responsibilities](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001030/content/554400000153946/FPM-Part-I-Chapter-1-Section-B-General-Information-on-the-Fiduciary-Program)

**CPKM**

* [38 CFR 3.353](https://vbaw.vba.va.gov/bl/21/publicat/Regs/Part3/3_353.htm), Determinations of Incompetency and Competency
* [38 CFR Book F](https://www.benefits.va.gov/warms/bookf.asp), Fiduciary Activities
* [M21-1, Part X,subpart ii, Chapter 3, Section C](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001034/content/554400000177967/M21-1-Part-X-Subpart-ii-Chapter-3-Section-C-Contemporaneous-Notice?query=contemporaneous%20notice), Contemporaneous Notice
* [M21-1, Part X, Subpart ii, Chapter 6, Section C](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001034/content/554400000177976/M21-1-Part-X-Subpart-ii-Chapter-6-Section-C-General-Information-on-Incompetency-and-Fiduciary-Cases), General Information on Incompetency and Fiduciary Cases
* [M21-1, Part X, Subpart ii, Chapter 6, Section D](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001034/content/554400000177977/M21-1-Part-X-Subpart-ii-Chapter-6-Section-D-Processing-Awards-to-Incompetent-Beneficiaries), Processing Awards to Incompetent Beneficiaries
* [M21-1, Part X, Subpart ii, Chapter 1, Section B](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001034/content/554400000177962/M21-1-Part-X-Subpart-ii-Chapter-1-Section-B-Protected-Ratings?query=due%20process%20and%20protected%20ratings), Protected Ratings

**Internet**

* VA Fiduciary Homepage, <https://www.benefits.va.gov/FIDUCIARY/>
* [Benefit Overview](https://www.benefits.va.gov/fiduciary/beneficiary.asp)
* [Fiduciary Overview](https://www.benefits.va.gov/fiduciary/fiduciary.asp)
* [A Guide for VA Fiduciaries](https://www.benefits.va.gov/FIDUCIARY/docs/VA_Fiduciary_Guide_Apr2020.pdf)
* YouTube Channel: [Welcome to the VA Fiduciary Program](https://www.youtube.com/watch?v=97UDnrJnPt4)

**VA Forms**

* VA Form [21-592](https://vbaw.vba.va.gov/bl/20/cio/20s5/forms/VBA-21-592-ARE.pdf), *Request for Appointment of a Fiduciary,*

*Custodian or Guardian*

* VA Form [21P-0792](https://vbaw.vba.va.gov/bl/20/cio/20s5/forms/VBA-21P-0792-ARE.pdf), *Fiduciary Statement in Support of Appointment*
* VA Form [21P-4703](https://vbaw.vba.va.gov/bl/20/cio/20s5/forms/VBA-21P-4703-ARE.pdf), *Fiduciary Agreement*
* VA Form [21P-4706b](https://vbaw.vba.va.gov/bl/20/cio/20s5/forms/VBA-21P-4706b-ARE.pdf), *Federal Fiduciary’s Account*
* VA Form [21P-4706c](https://vbaw.vba.va.gov/bl/20/cio/20s5/forms/VBA-21P-4706c-ARE.pdf), *Court Appointed Fiduciary’s Account*

# Introduction

The purpose of the Fiduciary program is to protect Veterans and beneficiaries who are unable to manage their financial affairs and to ensure VA benefit payments made to a fiduciary are used for the well-being of the beneficiary and the beneficiary’s dependents.

This training is an opportunity to identify updates to the fiduciary process, increase your confidence handling fiduciary call interactions, and be aware of your responsibilities as a Public Contact Representative (PCR).

# VA Fiduciary Program Overview

To address VA fiduciary inquiries, PCRs need to have an understanding of the program.

The VA Fiduciary Homepage [Benefit Overview](https://www.benefits.va.gov/fiduciary/beneficiary.asp) provides a general overview of the

program to the public to include:

* The VA Field Examination
* Selection Process
* What Are My Rights?

Also, the VA Fiduciary Homepage provides the link to the VA YouTube Channel:[Welcome to the VA Fiduciary Program](https://www.youtube.com/watch?v=97UDnrJnPt4), as an additional resource, to direct the public for added information after receiving a welcome letter to the Fiduciary program and the next steps.

During your call interactions, KM article [Fiduciary Program Ready Reference](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001001/content/554400000004225/Fiduciary-Program-Ready-Reference) is a good resource that identifies:

* How Can Someone Become Incompetent for VA Purposes?
* How the Issue of Incompetency Is Raised?
* Fiduciary Process
* Privacy Act Implications

## Responsibilities of the Fiduciary

Individuals selected to serve as a fiduciary responsibility include (not-all-inclusive):

* Knowing the beneficiary’s needs
* Managing the beneficiary’s funds
* Keeping in regular contact with the beneficiary
* Making sure the beneficiary receives proper medical care
* Responding to the VA in a timely manner
* Notifying the VA of any changes in the beneficiary’s circumstances
* General knowledge of VA benefits

There are different classifications of fiduciaries.

## Fiduciary Classifications

There exist different classifications of fiduciaries.

### Court-Appointed

A court-appointed fiduciary is a person, or a legal entity appointed by a state or foreign court to supervise an incompetent beneficiary and/or the person’s estate. Courts may appoint financial institutions, state agencies, corporations, fiduciary services, or individuals to serve.

Common titles used that indicate a court-appointed fiduciary for a person or legal entity (not all-inclusive):

* Guardian
* Conservator
* Committee
* Trustee, **or**
* Curator

VA reserves the right to deny court-appointed fiduciaries if that serves the VA and the beneficiary’s best interests. This means the court-appointed fiduciary will not automatically become the VA fiduciary.

## Federal Fiduciaries

A federal fiduciary is a person or legal entity authorized by the VA to serve as a payee for the VA benefits of an incompetent beneficiary.

### Spouse Payee

An incompetent Veteran’s spouse who is designated to administer the funds payable for the Veteran, and other dependents, if any.

### VA Appoint Fiduciary

All other persons or legal entities authorized by VA to serve as payee for the VA benefits of an incompetent beneficiary (not all-inclusive):

* Legal custodian (custody of estate)
* Custodian-in-fact (emergency or temporary payee)
* payments cannot be made in a timely manner to an existing or successor fiduciary, or
* payment to an existing or successor fiduciary would be inappropriate under the circumstances.
* Institutional award payee (chief officer of an institution who is authorized to receive the payment of all or part of the VA benefits for incompetent Veteran).
* The Veteran must be receiving hospital treatment or institutional, nursing, or domiciliary care in the facility.
* Superintendent of an Indian reservation superintendent or other officer designated by the Secretary of the Interior.

### Temporary Fiduciary

An individual or entity authorized to serve as VA payee for a beneficiary while a determination of incompetency is being made or appealed. VA may appoint a temporary fiduciary only when there is clear evidence that a beneficiary’s VA funds are being misused, or the beneficiary is unable or unwilling to use funds for urgent needs.

### Commissioned Fiduciary

The Veteran Service Center Manager (VSCM) must conservatively use his/her authority to permit Federal fiduciaries to charge commissions on the proceeds of beneficiaries’ VA benefits.

Federal fiduciary commissions should be authorized only as a last resort to induce a qualified fiduciary to serve when that fiduciary or another qualified fiduciary will not serve without a commission. The commission authorized may not exceed 4 percent of the monetary benefits paid by the VA on behalf of the beneficiary to the fiduciary

during a year. A year is the 12-month period following the anniversary date of the appointment of the fiduciary.

## Fiduciary Hubs

Fiduciary Hubs are centralized areas of operation responsible for managing fiduciary-related issues for a designated geographic area. Fiduciary Hubs are housed within the following Regional Offices (ROs):

* Columbia, SC
* Indianapolis, IN
* Lincoln, NE
* Louisville, KY
* Manila, Philippines
* Milwaukee, WI
* Salt Lake City, UT

Knowledge Check

***Select the best answer.***

1. *Which is not the responsibility of a fiduciary?*
2. *Knowing the beneficiary’s needs*
3. *Filing claim for increase in benefits*
4. *Managing payment of the beneficiary’s bills*
5. *Notifying VA of any changes in the beneficiary’s circumstances*
6. *Contacting the beneficiary’s estranged family*
7. *Updating contact and/or payment information*
8. *How can someone become incompetent for VA purposes?*
9. *Reason of not having reached the age of majority (minor child)*
10. *Court appointment*
11. *Living in a nursing home*
12. *Unable to manage monthly living expenses*
13. *VA rating decision*

# The Fiduciary Process

During interviews, you will be responsible for providing the status of the fiduciary or incompetency process upon request.

The process itself, is considered general information and may be shared with the general public. However, a request for the status of a claim is considered protected information and you must follow identification (ID) protocol before releasing protected information.

Refer to KM article [Identification (ID) Protocol Requirements](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001001/content/554400000003633/Identification-ID-Protocol-Requirements?query=identification).

## Incompetency Process Flowchart

KM article [Incompetency Flowchart](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001001/content/554400000004224/Incompetency-Flowchart?query=fiduciary) helps to understand the incompetency process.

VA must receive a court order or medical evidence to begin the incompetency process.

## Court Order

If VA receives a court decree of incompetency or a court appointment of a fiduciary

by reason of a beneficiary’s incompetency, it is unnecessary to prepare a proposed rating of incompetency or provide notice of proposed adverse action in the matter of incompetency. Due process is not required, and the record can be directly referred to the appropriate fiduciary hub for the establishment of a fiduciary.

For more information on the judicial determination process for a Veteran, review [M21-1, Part X, Subpart ii, Chapter 6, Section D](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001034/content/554400000177977/M21-1-Part-X-Subpart-ii-Chapter-6-Section-D-Processing-Awards-to-Incompetent-Beneficiaries). Additional information for a parent, surviving spouse, or adult child is found in [M21-1, Part X, Subpart ii, Chapter 6, Section D.2h](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001034/content/554400000177977/M21-1-Part-X-Subpart-ii-Chapter-6-Section-D-Processing-Awards-to-Incompetent-Beneficiaries).

## Medical Evidence

When no court determination of incompetency exists, the process begins with the receipt of medical evidence. The process begins with medical evidence that may be received in support of a pending claim/appeal (usually sent in by a concerned family member, etc.) illustrating that the beneficiary is unable to handle his or her financial affairs. Unless the medical evidence is clear, convincing, and leaves no doubt as to the person's incompetency, the rating agency will not make a determination of incompetency without a medical conclusion.

## Proposal of Incompetency

If evidence shows that financial incompetency may exist, a proposal of incompetency (or predetermination notice) is sent to the beneficiary. A proposal of incompetency informs the beneficiary:

* VA is proposing the establishment of a fiduciary to manage VA funds
* About their right to submit evidence to contest the proposal (within 60 days of the letter) and
* About their right to request a hearing to contest the proposal of
* incompetency (prior to the final rating)
* That the finding of incompetency may prohibit him/her from owning a gun based on the Brady Bill

Retroactive benefits (if any) are withheld until either beneficiary is rated competent or Fiduciary is established.

The Veterans Service Center (VSC) will then establish an End Product **(EP) 590** with the claim label “Due Process for Incompetency” and transfer the EP to the Fiduciary Hub of jurisdiction.

## Veteran/Beneficiary Response Options

Upon receipt of the incompetency proposal, the beneficiary may:

* Provide evidence within 60 days to show the proposed incompetency rating is not correct
* Request a hearing prior to the final rating to present information and/or evidence to show the proposed incompetency rating is not correct
* Submit no evidence by either:
	+ Waiving the 60-day due process to request the proposed incompetency be finalized and a fiduciary established without additional delay, or
	+ Doing nothing.

### Evidence Received within 60 days

The fiduciary hub of jurisdiction:

1. Changes the EP 590 to the appropriate EP 600:
2. 600CI, with the claim label Competency Issue (for disability compensation), or
3. 600IDPMC, with the claim label PMC Incompetency Determination (for pension)
4. Adds Competency as a contention
5. Lists the evidence and date received in tracked item(s), and
6. Updates the claim status to Ready for Decision.

Next, the RO assigned to the EP 600 evaluates the evidence and makes a final competency rating determination.

### Hearing Request Received

If a request for a hearing is received, then the fiduciary hub of jurisdiction:

1. Changes the EP 590 to an EP 600 and applies the more appropriate of the following two claim labels:
2. Competency issue (for awards of disability compensation claims), or
3. PMC Incompetency Issue (for awards of pension claims), and
4. Adds Local Hearing as a special issue

The ROJ is responsible for monitoring the status of the EP 600. The ROJ then:

1. Schedules and holds a hearing and
2. The ROJ’s rating activity makes a final determination regarding the beneficiary’s competency.

The ROJ is then responsible for reviewing the hearing and/or evidence

to issue a final competency rating of competent or incompetent.

## Competent Rating

The ROJ or Fiduciary Hub (if no evidence submitted) will review the pending incompetency file. If the final rating determines the beneficiary is competent then the authorizer:

1. Promulgates the rating decision
2. Completes any necessary award actions
3. Sends a decision notice to the beneficiary, **and**
4. Ensures all documentation is associated with the claims folder.

This ends the incompetency process.

What if the Veteran is rated incompetent?

##

## Incompetent Rating - Notice of Incompetency

Once the final rating is completed, the ROJ/Fiduciary Hub will:

* Promulgate the final rating decision
* Complete any necessary award actions
	+ Clear EP 600/590
	+ Release any recurring monthly awards
* Send a decision notice to the beneficiary
* Release all monthly/recurring benefits upon promulgation of an original award, reinstated award, or an award for an increase
* Continue to withhold retroactive funds until completion of the fiduciary appointment
* Establish **EP 290** “FID-Fiduciary Adjustment”
* Complete VAForm [21-592](http://vbaw.vba.va.gov/bl/20/cio/20s5/forms/VBA-21-592-ARE.pdf)*, Request for Appointment of Fiduciary, Custodian, or Guardian* (the Fiduciary Hub is then responsible for designating and establishing a fiduciary)
* Transfer the EP 290 to the Fiduciary Hub if necessary

The beneficiary is notified of the Brady Bill Act.

Knowledge Check

***Select the best answer****.*

1. *Which End Product (EP) is established at the beginning of the fiduciary process?*
2. *EP 290*
3. *EP 590*
4. *EP 600*
5. *EP 609*
6. *If an EP 290 is pending on an open fiduciary claim, this means that:*
7. *The beneficiary has been rated incompetent*
8. *The claim is currently at the Fiduciary Hub*
9. *The VSC has made a request to appoint a fiduciary*
10. *All of the above*

# Designating a Fiduciary

If a fiduciary is required, VA is responsible for selecting the most suitable fiduciary and payment method for each beneficiary.

## Least Restrictive

VA policy is to use the least restrictive payment method to meet the beneficiary’s needs and protect his/her VA estate. VA will first consider whether the beneficiary

can manage their VA benefits with limited supervision under supervised direct pay (SDP). SDP is the least restrictive payment method and is suitable for up to 24 months (2 years).

If SDP is not an option, the VA will consider the beneficiary’s spouse, family members, friends, and caregivers who are qualified and willing to provide fiduciary services for the beneficiary without a fee. If necessary, a temporary fiduciary can be appointed for up to 120 days. As a last resort, VA will consider the appointment of a paid fiduciary.

## Appointment of a Fiduciary

Upon receiving the request to EP290, the **Fiduciary Service Representative (FSR)** will assign an appointment for a field examination.

The **Field Examiner (FE)** then conducts the initial appointment to:

* Assess competency and welfare of the beneficiary
* Determine whether the beneficiary should receive benefit payments:
	+ Directly with SDP, or
	+ Through a fiduciary
* Determine, select, and appoint the appropriate type of fiduciary
* Complete VA Form 21-555, *Certificate of Legal Capacity to Receive and Disburse Funds*
* Provides VA Form 21-555 to the Fiduciary Hub manager
* The VSC manager or designee must then sign

Once the VA Form 21-555 is signed, the **Legal Instruments Examiner (LIE)** will:

* Certify the fiduciary
* Upload VA Form 21-555, and
* Send notification to the promulgation team to close the EP290

Upon receiving the request to close the EP290, the **Fiduciary Service Representative (FSR)** will:

* Determine the appropriate authorization actions to take and close the EP290
* Release retroactive benefits
* Upload a copy of the award to the VBMS eFolder

## Appeals

To initiate an appeal after a final rating of incompetency, a beneficiary should submit a HLR, Supplemental, or BVA appeal. The ROJ will handle all appeals of incompetency determinations.

If the beneficiary is only appealing the appointed fiduciary, then the appeal should be sent to the fiduciary hub of jurisdiction.

Here is a visual of the incompetency flowchart which is an attachment for today’s training.

Knowledge Check

***Select the best answer****.*

1. *What end product (EP) is used to transfer an incompetency rating to the fiduciary hub?*
2. *EP 590*
3. *EP 600*
4. *EP 290*
5. *EP 297*
6. *Which of the following is the least restrictive?*
7. *Commissioned Fiduciary*
8. *Legal Custodian*
9. *Spouse Payee*
10. *Supervised Direct Pay*
11. *Temporary fiduciary*
12. *Which employee at the Fiduciary Hub begins and ends the process of*

*designating a fiduciary?*

1. *Fiduciary Service Representative (FSR)*
2. *Field Examiner (FE)*
3. *Legal Instrument Examiner (LIE)*
4. *Veteran Service Center Manager (VSCM)*
5. *Temporary fiduciary*

# Public Contact Representative (PCR)

# Responsibilities

As PCRs, you have responsibilities handling fiduciary call interactions.

## ID Protocol

You are responsible for providing the status of the fiduciary or incompetency

process upon request. A request for the status of a claim is considered protected information and you must follow identification (ID) protocol before releasing protected information.

Refer to KM article [Identification (ID) Protocol Requirements](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001001/content/554400000003633/Identification-ID-Protocol-Requirements?query=identification) for additional information.

## Beneficiary

While incompetency is at issue, the beneficiary’s privacy is protected and claim-specific information cannot be provided to third parties without the beneficiary’s permission.

Once a beneficiary is rated incompetent, he or she must still provide valid identification or answer ID Protocol questions to verify their identity before releasing protected information. Keep in mind that incompetent beneficiaries are entitled to the same courtesy and service as other customers. You must answer all claim-related questions, advise when payments will be issued, how much the

payments are, and perform ITF procedures as needed.

## 3rd Party Requests

If you speak with an unauthorized 3rd party who is trying to assist their disabled family member, you cannot provide protected information without first properly identifying the beneficiary and obtaining his or her permission to speak with the 3rd party.

The authorization form (VA Form 21-0845, *Authorization to Release Information to a Third Party*) can be used for incompetent beneficiaries as well:

* Forms submitted by the beneficiary during the fiduciary process remain effective until the newly appointed fiduciary submits a new VA Form 21-0845 or revokes the old form (either in writing or verbally).

While incompetency is at issue, the beneficiary’s privacy is protected and claim-specific information cannot be provided to third parties without the beneficiary’s permission.

Once a beneficiary is rated incompetent, he or she must still provide valid identification or answer ID Protocol questions to verify their identity before releasing protected information. Keep in mind that incompetent beneficiaries are entitled to the same courtesy and service as other customers. You must answer all claim-related questions, advise when payments will be issued, how much the payments are, and perform ITF procedures as needed.

## Fiduciary

Once a fiduciary is appointed, they are considered a first-party and must be asked the same ID protocol questions as if they were the Veteran or beneficiary. You must verify the fiduciary’s identification and check that their name is in the system of records before divulging any protected information.

Additionally, fiduciaries may authorize third party consent to disclose protected information within the beneficiary’s file. The fiduciary must complete and sign VA Form [21-0845](https://gcc01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.vba.va.gov%2Fpubs%2Fforms%2FVBA-21-0845-ARE.pdf&data=04%7C01%7C%7Cc1f0bf2e90fb4b9303b508d89b7c574a%7Ce95f1b23abaf45ee821db7ab251ab3bf%7C0%7C0%7C637430305621969998%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=BNjqRttWKd0NNTQptlcMoZwo%2BK3OZRFzl%2FH5X8fpLhI%3D&reserved=0), Authorization to Disclose Personal Information to a Third Party, to grant authorization. If the 21-0845 is submitted prior to a fiduciary being appointed, then it will remain valid until revoked or a new form is submitted by the appointed fiduciary. This does not authorize changes to contact and/or payment information. That responsibility still falls on the fiduciary.

## Fiduciary Hub Referrals

Sometimes, you will be unable to assist an incompetent beneficiary or

their fiduciary with their request. The follow situations include:

* Change of address
* Change of direct deposit
* Tracer request
* Allegation of misuse

Refer to KM article [Fiduciary Referral Procedures](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001001/content/554400000011151/Fiduciary-Referral-Procedures) for policy guidance related to fiduciary hub referrals. Refer to KM article [Fiduciary Hub Referrals](https://vaww.vrm.km.va.gov/system/templates/selfservice/va_kanew/help/agent/locale/en-US/portal/554400000001001/content/554400000008846/Fiduciary-Hub-Referrals?query=fiduciary%20referral%20procedures) as an added resource for referrals.