COMBINED SUPPORTING STATEMENT FOR: VA FORM 26-8629, MANUFACTURED HOME LOAN CLAIM UNDER LOAN GUARANTY (MANUFACTURED HOME UNIT ONLY) AND VA FORM 26-8630, MANUFACTURED HOME LOAN CLAIM UNDER LOAN GUARANTY (COMBINATION LOAN - MANUFACTURED HOME UNIT AND LOT OR LOT ONLY) (2900-0408)

JUSTIFICATION

1. VA Form 26-8629 is used to establish the proper claim payment due a holder of a manufactured home loan guaranteed pursuant to 38 U.S.C. 3712(a)(1)(B), (D), and (F).

VA Form 26-8630 is used in VA's Guaranteed Manufactured Home Loan Program. It is completed and submitted by holders of terminated VA guaranteed combination manufactured home loans as a prerequisite to the payment of any claim. The information collected is used to determine the claim payment due the holder. The Secretary is required to establish the proper claim payment due a holder of a combination manufactured home loan guaranteed pursuant to 38 U.S.C. 3712(a)(1)(C) and (E) and/or 3712(a)(1) and (2).

The Secretary's authority to promulgate regulations for the manufactured home program is contained in 38 U.S.C. 3712(g) and pursuant to this authority regulations applicable to the liquidation and claim process have been issued.

2. VA Form 26-8629 is completed and submitted by holders of terminated VA guaranteed manufactured home unit loans as a prerequisite payment of any claims. VA Form 26-8630 is used as a prerequisite to payment of claims on terminated combination loans. The information collected is used to determine claim payment due the holder. Data furnished on these two forms, such as accrued interest, various expenses of liquidation, and claim balance, are used by the holder in determining the amount claimed. Supporting documentation required includes copies of the ledgers for VA use in verifying data provided by the holder to ensure its accounts are correct and to avoid overpayment.

3. These forms are available on the One VA website. VBA is currently hosting these forms on a secure server and does not currently have the technology in place to allow for the complete submission of these forms. Validation edits are performed to assure data integrity. Efforts within VA are underway to provide a mechanism to allow the information to be submitted electronically with recognized signature technology. There currently is no utility process in place that will allow the data submitted on these forms to be incorporated with an existing centralized legacy database.

4. No duplication is involved as the information relates to a veteran's individual loan account in each case.

5. The collection of information does not involve small businesses.

6. The information is only collected once; i.e., at the time a claim is filed. The Government could not pay legally due claims without the information.

7. There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

8. The agency notice was published in the Federal Register on February 21, 2008, Volume 73, Number 35, pages 9614-9615. There were no comments received.

9. No payments or gifts to respondents have been made under this collection of information.

10. Loan Guaranty Home, Condominium and Manufactured Home Loan Applicant Records, Specially Adapted Housing Applicant Records, and Vendee Loan Applicant Records - VA (55VA26) contained in the Privacy Act Issuances, 2001 Compilation.

11. No sensitive questions appear on the form.

12. Estimate of Information Collection Burden

VA Form 26-8629

- a. The number of respondents is estimated at 100.
- b. Frequency of response is on occasion.
- c. Annual burden is 33 hours.
- d. The estimated response time is 20 minutes per case based on informal consultation with program participants.
- e. The total estimated cost to respondents is \$495 (33 hours x \$15).

VA Form 26-8630

- a. The number of respondents is estimated at 10.
- b. Frequency of response is on occasion.
- c. Annual burden is 3 hours
- d. The estimated response time is 20 minutes per case based on information consultation with program participants.
- e. The total estimated cost to respondents is \$45.00 (3 hours x \$15).
- 13. This submission does not involve any recordkeeping costs.

14. Estimated Annualized Cost to the Federal Government

VA Form 26-8629

\$1,270 Estimated cost to the Federal Government for FY 2008 (100 cases x 30 minutes per case x \$25.39 average Loan Guaranty field salary)

VA Form 26-8630

- \$ 127 Estimated cost to the Federal Government for FY 2008 (10 cases x 30 minutes per case x \$25.39 average Loan Guaranty field salary)
- 15. There is no change in burden hours.
- 16. Information collection is not for tabulation or publication purposes.

17. The collection instruments, VA Form 26-8629 and VA Form 26-8630, may be reproduced and/or stocked by the respondents and veterans service organizations. These VA Forms do not display an expiration date, and if required to do so, it would result in unnecessary waste of existing stocks of these forms. These forms are submitted to OMB for approval every 3 years. As such, this date requirement would also result in an unnecessary burden on the respondents and would delay Department action on the benefit being sought. VA also seeks to minimize its cost to itself of collection, processing, and using the information by not displaying the expiration date. For the reasons stated, VA continues to seek an exemption that waives the displaying of the expiration date on VA Form 26-8629 and VA Form 26-8630.

18. There is no exception to the certification statement identified in Item 19, Certification for Paperwork Reduction Act Submissions of OMB Form 83-1.

B. STATISTICAL METHODS

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