## SUPPORTING STATEMENT FOR VA FORM 26-6393, LOAN ANALYSIS (2900-0523)

## A. Justification

- 1. VA Form 26-6393 is currently used by employees of both lending institutions and VA to determine the ability of a veteran-applicant to qualify for any type of VA-guaranteed loan authorized by 38 U.S.C. 3710(a). Lenders complete and submit the form to provide evidence that the lender's decision to submit a prior approval loan application or close a loan on the automatic basis is based upon appropriate application of VA credit standards as required by 38 U.S.C. 3710(b) and 3710(g).
- 2. The form will be completed by employees of lending institutions partially from information contained on other documents in the loan file. In addition, some items will be completed on the basis of mathematical calculations and underwriting judgment resulting from interpretation of VA credit standards (38 CFR 36.4337). VA employees will also be able to extract data from the completed form in order to expand the amount of information contained in VA's data bases; i.e., income and indebtedness amounts for veteran-borrowers.
- 3. This form is available on the One VA Forms Website (<a href="http://www.va.gov/vaforms">http://www.va.gov/vaforms</a>) in a fillable electronic format. VBA is currently hosting this form on a secure server. The lender needs to complete the form and then print a copy. It is then submitted along with the loan package to the Regional Loan Center of jurisdiction if a review is necessary.
- 4. The information is not contained in any other VA records. Similar information is not available elsewhere.
- 5. Small organizations are involved and VA Form 26-6393 is designed to help minimize their burden. The use of this form provides VA with evidence of the lenders' adherence to VA credit standards.
- 6. Without this information, VA could not accurately assess the lenders' adherence to VA credit standards.
- 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 <u>Federal Register</u> on September 29, 2009, page 49916. No comments were received.
  - 9. Decisions to provide any payment or gift to respondents do not apply.
- 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. <u>Estimated Cost to Respondents</u>
  - a. The number of respondents per year is estimated at 200,000.

- b. Frequency of response is on occasion.
- c. Annual burden is estimated at 50,000 hours.
- d. The estimated average response time is 15 minutes and no adjustment is necessary.
- e. The total estimated cost to respondents is \$750,000 (200,000 responses x 15 minutes per response x \$15 per hour).
  - 13. This submission does not involve any recordkeeping costs.
  - 14. Estimated Cost to the Federal Government

\$1,330,000	Estimated Loan Guaranty Processing Cost for FY 2009 (200,000 cases x 15 minutes x \$26.60 per hour (average Loan Guaranty field salary))
0	No cost for printing and mailing- internet only form
\$1,330,000	Estimated cost to Federal Government

- 15. The burden hours decrease based on our estimate of higher loan volume this year but a shorter response time. Due to low interest rates, loan volume is increasing. Low rates make refinancing attractive and also encourage persons wanting to purchase. The majority of lenders have automated loan origination systems which facilitate completion of the form.
  - 16. Information collection is not for publication purposes.
- 17. The collection instrument, VA Form 26-6393, may be reproduced and/or stocked by the respondents and veterans service organizations. This VA form does not display an expiration date, and if required to do so it would result in unnecessary waste of existing stocks of this form. 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 collecting, 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 26-6393.
- 18. This submission does not contain any exceptions to the certification statement identified in item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

## B. Statistical Methods

The data collection does not employ statistical methods.