

SUPPORTING STATEMENT – VA FORM 26-0829
SERVICER’S STAFF APPRAISAL REVIEWER (SAR) APPLICATION
(2900-0715)

A. Justification

1. VA Form 26-0829 will be used to collect data necessary for Department of Veterans Affairs (VA) compliance with the requirements of 38 U.S.C. 3702(d) and 38 CFR 36.4344. Title 38 U.S.C. 3702(d) authorizes VA to establish standards for servicers liquidating automatically guaranteed loans and 38 CFR 36.4344 establishes requirements and procedures for lenders/servicers in being approved to perform the functions under the Servicer Appraisal Processing Program (SAPP).

2. VA Form 26-0829 is used by employees of servicers making application, and by servicers to nominate employees to be approved as a VA Staff Appraisal Reviewer (SAR). VA General Counsel has determined that the granting of such approval constitutes the granting of a license. Servicer SARs, once approved, are delegated the authority to review real estate appraisals and to issue Liquidation Notices of Value (NOVs) on behalf of VA. These NOVs establish the reasonable value to be used in liquidating a VA-guaranteed loan. The granting of this authority has direct impact on program integrity and the financial interests of VA, veterans, and the United States Government.

Once approved, a SAR retains their original SAR Identification Number whenever changing employment. Whenever a SAR changes employment, they and their new employer must make the certifications on this form to VA as a way for VA to track where a SAR is employed, and for what servicer they are performing. This is a critical factor in VA’s program oversight. The information collected with this form will be used by VA only, and will not be released except under provisions of law (FOIA, subpoena, etc.).

3. This form is available in a fillable electronic format on the One VA forms website at <http://www.va.gov/vaforms>. VA has not developed an information technology solution for receiving this form because of its limited use. As such, an electronic submission system is not cost beneficial to the government at this time.

4. This information is not contained in any other VA records. Note, VA Form 26-0785 is the application form for a lender appraisal processing program staff appraisal reviewer. However, VA Form 26-0829 is the application for servicer appraisal processing program staff appraisal reviewer. Lenders originate loans and Servicers service/liquidate. This is not a duplicate collection because it is for two different programs. Similar information is not available elsewhere due to the program being unique to VA.

5. Some servicers may be considered as being small business. The very nature of SAPP minimizes the burden on small business by allowing them to control their loan

liquidation processing in their normal fashion rather than submitting appraisals to VA for prior review and value determination.

6. VA has specific oversight requirements to ensure program integrity. Without this information, VA would not be able to track the location and business affiliations of program participants who are delegated authority to establish liquidation value determinations that directly lead to loan liquidation, which constitutes financial obligations to VA. The use of the form establishes a starting point from which to track SARs and serves as a certification that they possess sufficient knowledge to hold them accountable in the event of unacceptable performance.

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

8. The Department notice was published in the Federal Register April 13, 2011, page 20822. No comments were received.

9. Decisions to provide any payment or gift to respondents do not apply.

10. Loan Guaranty Fee Personnel and Program Participants Records – VA (17VA26) as set forth in the Privacy Act Issuances, 2001 Compilation.

11. No sensitive questions appear on the form.

12. Estimate of Information Collection Burden

a. Number of respondents is estimated at 20 per year.

b. Frequency of response is generally on occasion.

c. Annual burden is estimated at 2 hours.

d. The estimated response time of 5 minutes has been determined to be an average time spent to report the information requested and no wide variance is likely.

e. The total estimated cost to respondents is \$30 (2 hours X \$15 per hour).

13. This submission does not involve any record keeping costs.

14. Estimated Annualized Cost to the Federal Government

\$120 Total estimated cost to the Federal Government for FY11
(20 cases X 10 min. per case X \$35.92 per hour
(average Loan Guaranty field salary - GS11/Step 7)).

15. The decrease in burden hours is due to the drop in the number of respondents

from 537 to 20. Program participation by servicers has not been as widely accepted as anticipated. Therefore, VA continues to review and issue the majority of NOVs.

16. Information is not for publication purposes.

17. VA requests approval to omit the expiration date based on the small number of submissions anticipated. The form would not be expected to vary from its minimal information being collected and it is unlikely the form will be changed on anything approximating a regular basis. This form will be 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 26-0829.

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. Collections of Information Employing Statistical Methods

The Department of Veterans Affairs does not collect information employing statistical methods.