

SUPPORTING STATEMENT FOR VA FORM 26-1852,
DESCRIPTION OF MATERIALS
(2900-XXXX)

A. Justification

1. Description of Materials has been a joint Department of Veterans Affairs (VA)/Department of Housing and Urban Development (HUD) form, HUD-92005/VA Form 26-1852. HUD has recently announced that they will no longer be using this form.

VA Form 26-1852 is completed by builders in every Specially Adapted Housing (SAH) project involving construction as authorized under Title 38, U.S.C., section 2101 (a), section 2101 (b), and the Temporary Residence Adaptations (TRA) grant under Title 38, U.S.C., section 2102A. This form is also completed by builders who propose to construct homes to be purchased by veterans using their VA Home Loan benefit as granted in Title 38 U.S.C., section 3710(a)(1). SAH field staff review the data furnished on the form for completeness and it is essential to determine the acceptability of the construction materials to be used. In cases of new home construction, a technically qualified individual, not VA staff, is required to review the list of materials and certify they meet or exceed general residential construction material requirements, as specified by the International Residential Code and residential building codes adopted by local building authorities, and are in substantial conformity with VA Minimum Property requirements.

The information collected on the form documents the materials that will be used in the construction of the housing unit, and provides a basis for cost and value estimates.

2. The description of materials list will be used by the builder as documentation of the name, number, size, model, grade, type, weight, thickness, width, spacing, gage, or color of the materials to be used in the construction of the dwelling or SAH project. The information may be used by the builder to obtain construction financing. The information is used in part by SAH agents and VA appraiser in establishing the value and or cost of adaptations for the property before it is constructed.

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 in new construction cases this form is transmitted directly to an appraiser, not VA, or its staff, and the cost to the government for creating such a system for SAH cases is not economically justifiable.

4. The information collected on VA Form 26-1852 is unique to VA and is not duplicated in other agencies' records or in other VA records.

5. The collection of information does involve small business organizations but collection of the information is the same for large businesses and no method to minimize the burden has been recognized.

6. The information collected on this form is completed by builders seeking an appraisal so that a veteran may purchase the property before it is constructed as well as assist VA management in administering the SAH grant program to determine market price, as needed, for SAH construction projects. If the information is not collected a "Proposed Construction" appraisal and the approval of an SAH grant cannot be completed, and the veteran or servicemember would be denied the benefit to purchase a property to be constructed granted in Title 38 U.S.C., section 3710(a)(1) as well as veterans and servicemembers with service connected disabilities would not have access to a barrier-free living environment as required by Title 38, chapter 21.

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 Department notice was published in the Federal Register on April 23, 2012 at pages 24269-24270. No comments were received.

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

10. No assurance of confidentiality is provided.

11. No questions of a sensitive nature appear on the form.

12. Estimate of Information Collection Burden

a. The number of respondents for new construction cases is estimated at 2,800 per year and for SAH cases it is 1,400 per year.

b. Frequency of response is generally one-time.

c. Annual burden is 2,100 hours.

d. The estimated response time is 30 minutes.

e. The total estimated cost to respondents is \$31,500 (2,100 hours x \$15 per hour).

13. This submission does not involve any recordkeeping costs.

14. Estimated Cost to the Federal Government

There is no cost for new construction cases. Loan Guaranty does not receive this form for new construction cases, it is sent directly from the lender to the appraiser.

The Government cost for SAH cases is \$3,178 (Loan Guaranty processing cost for FY 2012 (1,400 cases x 5 minutes per case x \$27.24 per hour average Loan Guaranty field salary))

15. This form was previously under a HUD OMB control number. Recently, Loan Guaranty was made aware by HUD that this form was being discontinued. As a result, Loan Guaranty moved immediately to submit a request for a new OMB control number, and to revise the form to remove any reference to HUD.

16. Information collection is not for tabulation or publication purposes.

17. The collection instrument, VA Form 26-1852, may be reproduced and/or stocked by the respondents and veterans service organizations. This VA form should not display an expiration date, and if required to do so it would result in unnecessary waste of existing stocks of this form. This form is 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 seeks an exemption that waives the displaying of the expiration date on VA Form 26-1852.

18. This submission does not contain any exceptions to the certification statement.

B. Collection Of Information Employing Statistical Methods

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