SUPPORTING STATEMENT FOR VA FORM 26-1839 COMPLIANCE INSPECTION REPORT (2900-0041)

A. Justification

- 1. 38 U.S.C. chapter 21 provides the Secretary authority to assist certain disabled veterans in acquiring specially adapted housing. Section 2101(c) explains that benefits afforded under this chapter shall be provided in accordance with regulations prescribed by the Secretary. Pursuant to this authority, 38 C.F.R. 36.4408 provides that the Secretary may, at any time, require submission of such proof of costs and other matters as the Secretary deems necessary.
- 2. The system of compliance inspections provides a level of protection to the specially adapted housing veteran by assuring them and VA that the adaptation is constructed in substantial conformity with the plans and specifications upon which a Specially Adapted Housing Grant is based.
- 3. Considering the small volume of cases, we do not believe that automation would be cost effective for VA, or the fee-basis inspectors who complete the form. VA Form 26-1839 requires very specific information collected in the field at the time the inspection is performed. In fact, if VA forced inspectors to automate their use of the form in a manner that is not cost effective for them, that would likely discourage their future participation in the VA Loan Guaranty program. Therefore, we have no plans to automate the use of this form. VA Form 26-1839 is located on the VA Forms website in a fillable electronic format.
- 4. No duplication of information is involved. Compliance inspections are performed on specific properties based on plans and specifications on a particular property.
- 5. Small organizations are involved, however, the information requested is the minimum necessary to determine compliance with VA-approved plans and specifications and VA minimum property standards.
- 6. This information collection is not a recurring or repetitive report. It is accomplished on a one-time basis per individual applicant.
- 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 Vol.78, No. 230, on November 29, 2013 at page 71725. There were no comments received in response to this notice.
- 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
- a. Number of respondents is estimated at 3,600 per year.
- b. Frequency of response is generally one time.
- c. Annual burden is 900 hours.
- d. The estimated average completion time of 15 minutes per response was based on informal consultations with fee compliance inspectors and staff reviewers.
- e. According to the U.S. Bureau of Labor Statistics Average Hourly Earnings, the cost to the respondent is \$24, making the total cost to the respondents an estimated \$21,600 (900 hours x \$24 per hour).
 - 13. This submission does not involve any recordkeeping costs.
 - 14. Estimated Cost to the Federal Government
 - \$ 4,903 Estimated Loan Guaranty processing cost for FY 2014 (3600 responses x 3 minutes per case x \$27.24 per hour (average Loan Guaranty field salary))
 - \$4,903 Total estimated cost to Government
- 15. There is a decrease in burden hours due to this form no longer being used by the Loan Guaranty Construction and Valuation section. The form has been updated to include the expiration date placeholder.
 - 16. Information collection is not for tabulation or publication use.
- 17. We are not seeking approval to omit the expiration date for OMB approval.
- 18. There is no exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-I.

A. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

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