## SUPPORTING STATEMENT FOR VA FORM 26-4555, APPLICATION IN ACQUIRING SPECIALLY ADAPTED HOUSING OR SPECIAL HOME ADAPTATION GRANT (2900-0132)

#### A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

VA grants for Specially Adapted Housing (SAH) and Special Housing Adaptations (SHA) for disabled Veterans or Servicemembers are authorized under Title 38, U.S.C., chapter 21. Once entitlement is determined, Veterans and Servicemembers with certain permanent and total service-connected disabilities may use the SAH or SHA grant to help purchase or construct an adapted home, or modify an existing home to accommodate a disability.

SAH grants can be used to construct, remodel, or help a Veteran or Servicemember purchase a home that meets the individual's needs. This grant is available to Veterans and Servicemembers with the following service-connected disabilities: loss of/loss of use of both legs; loss of/loss of use of both arms; blindness in both eyes having only light perception with loss of/loss of use of one leg; loss of/loss of use of one lower leg with residual organic disease or injury; loss of/loss of use of one leg together with the loss of/loss of use of one arm; or certain severe burns (VA, 2014a). Veterans and Servicemembers serving post 9-11 may qualify with loss or loss of use of one or more lower extremities significantly affecting balance or propulsion and precluding ambulation without the aid of braces, crutches, canes, or wheelchair.

SHA grants are available to Veterans and Servicemembers with the following service-connected disabilities: visual impairment (blindness in both eyes with 20/200 visual acuity or less); loss/loss of use of both hands, certain severe burns, or certain respiratory or inhalation injuries. SHA grants can be used to (a) adapt an existing home the Veteran or a family member already owns in which the Veteran lives, (b) adapt a home the Veteran or family member intends to purchase in which the Veteran will live, or (c) help a Veteran purchase a home already adapted in which the Veteran will live.

Temporary Residence Adaptation (TRA) grants are available to SAH/SHA eligible Veterans and Servicemembers who are or will be temporarily residing in a home owned by a family member.

2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.

VA Form 26-4555 is used to gather the necessary information to determine the eligibility for the SAH or SHA grant. The Veteran or Servicemember will complete VA Form 26-4555 and submit it to the nearest VA Regional Loan Center. VA will

control the application, establish a file on the incoming forms, and forward them to the Veterans Service Center (VSC). VSC will process the forms and return them along with a rating decision to Loan Guaranty. Then Loan Guaranty will update the file and send the appropriate form letter to the Veteran or Servicemember notifying him or her of basic eligibility for the SAH or SHA benefit. The initial interview with the Veteran or Servicemember will be held within 30-business days for purposes of providing grant and related information.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Veterans and Servicemembers have the option to submit VA Form 26-4555 electronically through the eBenefits website at <a href="https://www.ebenefits.va.gov/">https://www.ebenefits.va.gov/</a>. About 900 respondents (15% of the total applications received) submit applications electronically each year. The electronic format requires the Veteran or Servicemember to complete two additional questions related to prior grant use and the existence of a power of attorney. This information is collected on behalf of Compensation and Pension (C&P) to facilitate processing a claim for SAH benefits. Since C&P may request additional information from the Veteran or Servicemember as needed during examination of the Veteran or Servicemember's record, that same information is not collected on VA Form 26-4555. VA Form 26-4555 is also available through the One VA forms website at <a href="http://www.va.gov/vaforms">http://www.va.gov/vaforms</a> in a fillable electronic format.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

No duplication of information is involved. The electronic form solicits personal information from the Veteran and Servicemember that would not be available in another agency's records. To the extent VA already has access to certain specific information pertaining to an individual applicant, eBenefits will pre-populate those specific items and it will not be necessary for an applicant to re-submit such information. However, if the information on record with VA or the Department of Defense (DoD) is incorrect or incomplete, individual applicants will need to provide certain specific information necessary to determine eligibility for SAH benefits.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Small business organizations are not involved.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

Frequency is generally one-time per applicant. This information will be collected on an "as needed" basis and is required to establish eligibility for the SAH, SHA, or TRA grant. Failure to provide a properly completed VA Form 26-4555 will prevent eligibility from being established and grant processing cannot continue. To the extent VA already has access to certain specific information pertaining to an individual applicant eBenefits will pre-populate those specific items and it will not be necessary for an applicant to re-submit such information. However, if the information on record with VA or DoD is incorrect or incomplete individual applicants will need to provide certain specific information necessary to determine eligibility for SAH benefits.

7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OMB.

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. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

The Department notice was published in the Federal Register on December 22, 2014, Volume 79, No. 245, pages 76451-76452. No comments were received in response to this notice.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

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

10. Describe any assurance of privacy, to the extent permitted by law, provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

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. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature are contained on the form.

#### 12. Estimate of the hour burden of the collection of information.

Estimate of Information Collection Burden:

- a. The number of respondents is estimated at 6,000 per year. Online respondents account for 15% of this total.
  - b. Frequency of response is generally on occasion.
  - c. Annual burden is 1000 hours.
- d. The estimated response time is 10 minutes for both the paper form and electronic form.
- e. According to the U.S. Bureau of Labor Statistics, Average Hourly Earnings are \$24, making the total cost to the respondents an estimated \$24,000.
- 13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

This submission does not involve any recordkeeping costs.

14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Estimated Annualized Cost to the Federal Government:

\$ 35,920 Total estimated cost to the Government (Loan Guaranty processing cost for FY 2014 (6,000 cases x 10 minutes per case x \$35.92 per hour average Loan Guaranty field salary))

# 15. Explain the reason for any burden hour changes since the last submission.

The increase in burden hours is due to the rise in the number of respondents for SAH or SHA grants from 4,158 to 6,000 annually due to improved outreach campaigns. The form is being revised to add the expiration date and to change Item 6, Address, into separate items for each part of the address.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Information collection is not for publication purposes.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We are not seeking approval to omit the expiration date for OMB approval.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.

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.