DESCRIPTION OF MATERIALS
(2900-0788)
VA Form 26-1852

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 Form 26-1852 is completed by builders in Specially Adapted Housing (SAH) projects 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. The Description of Materials data is now also being accepted by Loan Guaranty Service (LGY) in whatever format the builder prefers, as long as it includes enough detail so that it may be relied upon for compliance inspections and mediating potential construction complaints. The information required is determined by the contract agreed upon between the Veteran and the builder. Regional Loan Center (RLC) staff determined that builders already have the means to adequately meet this requirement, making the form duplicative and causing potential delays in project completion.

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.**
   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. **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.**
   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. **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.**
   The information collected on VA Form 26-1852, or preferred builder format, is unique to VA and is not duplicated in other agencies' records or in other VA records.

5. **If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden**.
   The collection of information could 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. VA allows the information in this collection to be submitted in a variety of ways, and a business can submit the information in a way that causes the least amount of burden on them, as long as the required information is provided.

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.**
   The information collected under this collection 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. **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 is no special circumstance requiring collection in a manner inconsistent with 5 CFR 1320.6 guidelines.

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 Februrary 17th, 2015, Volume 80, No. 31, page 8389. 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**.
    No assurance of confidentially is provided.

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 appear on the form.

12. **<u>Estimate of the hour burden of the collection of information:</u>**

    Estimate of Information Collection Burden.

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

b. Frequency of Response: Frequency of response is generally one-time.

c. Annual Burden Hours: Annual burden is 1,800 hours.

d. Estimated Completion Time: The estimated completion time is 30 minutes.

e. According to the U.S. Bureau of Labor Statistics, Average Hourly Earnings, the cost to the respondent is $25, making the total cost to the respondents $45,000 (1,800 burden hours x $25 per hour).

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 Costs to the Federal Government:

a. Processing and Analyzing costs - There is no cost for ***new*** contruction 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 $2,078.67 (Loan Guaranty processing cost for FY 2014 (800 cases x 5 minutes per case x $31.18 per hour average Loan Guaranty field salary).
b. N/A
c. N/A
d. Total cost to government - $2,078.67

15. Explain the reason for any burden hour changes since the last submission.
There is an decrease in respondent burden due to accepting the information in other formats as well as the form being updated. The expiration date placeholder has been added to the form.

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.

The information collection is not for tabulation or 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 83-1.**
    This submission does not contain any exceptions to the certification statement.

B. Collection Of Information Employing Statistical Methods

This collection of information does not employ statistical methods.