

**SUPPORTING STATEMENT FOR VA FORM 26-0967, CERTIFICATION REGARDING DEBARMENT,
SUSPENSION, INELIGIBILITY AND VOLUNTARY EXCLUSION (DOCUMENTS AND INFORMATION
REQUIRED FOR SPECIALLY ADAPTED HOUSING ASSISTIVE TECHNOLOGY GRANT) AND VA
FORM 26-0967A SCORING CRITERIA FOR SAH ASSISTIVE TECHNOLOGY GRANTS
(2900-0821)**

A. Justification

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

Section 203 of the Veterans' Benefits Act of 2010, Public Law 111-275, amended 38 U.S.C. chapter 21, established the Specially Adapted Housing (SAH) Assistive Technology Grant program. 38 U.S.C. 2108 states that a person or entity seeking an SAH technology grant shall submit an application for the grant in such form and manner as the Secretary shall specify. VA published regulations to outline the process, the criteria, and the priorities relating to the award of these research and development grants. The regulations require applicants to submit VA Form 26-0967, *Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion*. These regulations also require applicants to provide statements addressing six scoring criteria for grant awards as part of their application, provided on VA Form 26-0967a, *Scoring Criteria for SAH Assistive Technology Grants*. Lastly, the regulations require that applicants submit Standard Form 424, *Application for Federal Assistance*, which is covered under an existing information collection (OMB Number: 4040-0004).

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.

Non-Federal entities (state and local governments, and non-profit organizations, academic institutions), private entities, and individuals may submit this information to complete an application for the SAH Assistive Technology Grant program. Applicants may either obtain printed copies of the forms or electronically download the required forms. These forms and other required statements are then completed and the applications submitted to VA electronically through Grants.gov. The signed forms provide certification of compliance with VA grant requirements. VA will use all information submitted by applicants, including the SF 424, VA Form 26-0967, and VA Form 26-0967a in its grant award process. The information will be used by Loan Guaranty personnel in deciding whether an applicant meets the requirements and satisfies the scoring criteria for award of an SAH Assistive Technology grant under 38 U.S.C. 2108.

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.

Applicants for an SAH Assistive Technology grant will submit their applications to the Secretary via Grants.gov. Grants.gov provides a centralized location for federal agencies to post discretionary funding opportunities for grant seekers to find and apply for federal funding opportunities. Electronic submission through this centralized website will reduce

the burden on applicants and VA and will improve consistency in submissions. VA will use the information contained in Standard Form 424, VA Form 26-0967, and VA Form 26-0967a to confirm applicant certification of compliance with grant requirements, in the official grants award process. These forms will be accessed and downloaded at the One-VA Forms Site (<http://vaww4.va.gov/vaforms/>) and Grants.gov (<http://www.grants.gov>).

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 to be collected 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 will affect non-Federal entities, private entities, and individuals who chose to submit applications for the SAH Assistive Technology grant. This information collection is limited to determining whether, and to what degree, the applicant meets the requirements used in the award process of SAH Assistive Technology grants. Applicants may only apply for one grant per year, and once per project, in the maximum amount of \$200,000 per project. Therefore this information is considered to only be collected one time, and may be submitted electronically, which lessens the burden on any small businesses or other small entities who choose to submit applications.

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.

This information is collected only when a non-Federal entity, private entity, or individual wishes to apply for a SAH Assistive Technology grant. This information is essential to the SAH Assistive Technology grant applications, the form and manner of which the Secretary has described in regulations pursuant to 38 U.S.C. 2108. The collection is generally conducted only one time, at the time of application submission. If this information was collected less frequently, VA would be unable to adequately assess applications or perform its statutory obligation to administer the program.

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 60-day notice was published in the Federal Register on March 19, 2018, Volume 83, No, 53, pages 12082-12083. The Department 30-day notice was published in the Federal Register on June 28, 2018, Volume 83, No, 125, page 30478. No comments were received in response to these notices.

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, 2018 Compilation, as posted in the Federal Register on August 13, 2018, Volume 83, Number 156, pages 40140 - 40147.

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.

There are no questions of a sensitive nature.

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

- a. Number of yearly respondents totals = 20.
- b. Frequency of Response is one time.
- c. Annual burden total = 40.
- d. The estimated completion time is 120 minutes.
- e. The respondent population for VA Form 26-0967, VA Form 26-0967a, and Standard Form 424 are employees from non-Federal entities, academic institutions, private entities, and individuals who chose to submit applications for the Loan Guaranty Specially Adapted Housing Assistive Tech Grant Program. VBA cannot make further assumptions about the population of respondents because of the variability of factors

such as the educational background and wage potential of respondents. Therefore, VBA used general wage data to estimate the respondents' costs associated with completing the information collection.

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean weekly earnings of full-time wage and salary workers are \$973.60. Assuming a forty (40) hour work week, the median hourly wage is \$24.34 based on the BLS wage code – “00-0000 All Occupations”. This information is taken from the following website: https://www.bls.gov/oes/2017/may/oes_nat.htm

Legally, respondents may not pay a person or business for assistance in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VBA estimates the total cost to all respondents to be \$954.40 (40 burden hours x \$24.34 per hour).

13. Provide an estimate of the total annual cost burden to respondents or record-keepers 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:

Grade	Step	Burden Time	Hourly Rate	Cost Per Response	Total Responses	Total
13	5	2.0 hrs	\$ 41.07	\$ 82.14	20	\$ 1,642.80
Overhead at 100% Salary						\$ 0
Overhead costs are 100% of salary and are the same as the wage listed above and the amounts are included in the total.						
Processing / Analyzing Costs						\$0
Printing and Production Cost						\$0
Total Cost to Government						\$1,642.80

Note: the hourly wage information above is based on the hourly 2018 General Schedule (Base) Pay (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS_h.pdf). This rate does not include any locality adjustment, as applicable.

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

Not applicable as the burden has not changed.

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 publication or tabulation use.

17. If seeking approval to omit 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 data collection does not employ statistical methods.