

SUPPORTING STATEMENT FOR VA FORM 26-6681
APPLICATION FOR FEE OR ROSTER PERSONNEL DESIGNATION
(2900-0113)

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 uses fee basis appraisers to appraise residential real estate and recommend value for loan purposes. A fee appraiser is a qualified person requested by the Secretary to render an estimate of the reasonable value of a property, or of a specified type of property, within a stated area for the purpose of justifying the extension of credit to an eligible veteran (38 CFR 36.4301). The fee appraiser's estimate of value is reviewed by a VA staff appraiser or lender's staff appraisal reviewer who uses the data to establish the VA reasonable value (38 U.S.C. 3710(b)(4), (5), (6) and 3731(f)(1)), which becomes the maximum loan guaranty amount an eligible veteran can obtain.

The Secretary is authorized by 38 U.S.C. 501(a) "... to prescribe all rules and regulations which are necessary or appropriate to carry out the laws administered by the Department...". One of these laws (38 U.S.C. 3704(a)) states that "No loan for the purchase or construction of residential property shall be financed through the assistance of this chapter unless the property meets or exceeds minimum requirements for planning, construction, and general acceptability prescribed by the Secretary...". To carry out the provisions of this law, compliance inspectors are used when necessary to verify that builders/sellers are complying with the requirements established by the Secretary. Since the Secretary is authorized to make the rules and regulations with respect to carrying out the provisions of title 38, this would also include the authority to collect necessary information to determine the qualifications and acceptability of compliance inspectors. No designation as compliance inspector may be made unless a completed application form has been received (38 U.S.C. 501(a), 513 and 3704(a)).

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 26-6681 solicits information on the fee personnel applicant's background and experience in the real estate valuation field. VA Regional Loan Centers (RLCs) use data on the form to evaluate the applicants' experience for the purpose of designating qualified individuals to serve on the fee roster for their stations. Qualifications are stated in 38 CFR 36.4339.

Upon receipt of the form, the Valuation Officer determines if basic qualifications have been met. Applications which meet the basic qualifications are retained in a pending file if no vacancies exist, and applicants are informed by letter that all eligible applications will be considered when a vacancy occurs. Applicants who fail to meet the basic qualifications are informed by letter and the application is held for 6 months and is then destroyed.

When a vacancy does occur, applications are reviewed by the Fee Panel Committee and designation or rejection of applicants is made to the Loan Guaranty Officer (LGO). If an applicant is designated, he or she is notified by letter from the LGO. Applications for designated fee appraisers and compliance inspectors are maintained in a fee personnel file. Since the recommendations of fee personnel concerning the value and/or condition of properties proposed

as security for home loans directly impacts loan approval decisions, and therefore the Government's contingent liability, it is essential that persons performing this work be well-qualified. The collection of this information is essential in evaluating the professional expertise of fee applicants.

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 VA forms website at <http://www.va.gov/vaforms>. VBA is currently hosting this form on a secure server. Individuals can complete and save a copy of the form to their computer and submit via e-mail to the RLC of their jurisdiction. E-mail address can be found on the Fee Panel Application page at https://www.benefits.va.gov/HOMELOANS/appraiser_fee_app.asp.

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.

There is no duplication of information involved. No similar information is available as the form solicits information concerning the fee personnel applicant's qualifications.

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

Small organizations are not involved. The VA obtains the services of fee personnel on an individual basis only, based on the professional expertise of the individual.

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 collection is not a recurring or repetitive report. It is accomplished on a one-time basis per individual applicant.

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 April 25, 2018, Vol. 83, No. 80, page 18131. No comments were received.

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.

VA will not disclose information collected on this form to any source other than what has been authorized under the Privacy Act of 1974, 78 FR 71727 and Title 38 Code of Federal Regulations 1.576 for routine uses identified in the VA system of records.

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

Estimate of Information Collection Burden

- a. Number of respondents is estimated at 2,000 per year.
- b. Frequency of response is one-time.
- c. Annual burden is 1,000 hours.
- d. The estimated average response time of 30 minutes is based on trial use with staff personnel including appraisers, who are familiar with the type of information required by the form.
- e. The total estimated cost to respondents is \$24,930 (1,000 hours x \$24.93 per hour). The respondent population is composed of fee appraisers. 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 median hourly wage is \$24.93 based on the BLS wage code – “occupation code 13-2021: Appraisers and Assessors of Real Estate.” This information was taken from the following website:
<https://www.bls.gov/oes/2016/may/oes132021.htm>.

Legally, respondents may not pay a person or business for assistance in completing the information collection and a person or business may not accept payment for assisting a respondent 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 \$24,930 (1,000 burden hours x \$24.93 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 record keeping 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

\$35,160 Loan Guaranty processing cost for FY 2018 (2,000 cases x 30 minutes = 1,000 hours x \$35.16 per hour (GS-12 step 1 is the average Loan Guaranty field salary). https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/RUS_h.pdf

\$35,160 Total estimated cost to Federal Government (no printing costs involved).

15. Explain the reason for any burden hour changes since the last submission.
There is no change in burden hours or respondent time.

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 use.

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.

There is no exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-1.

B. Collection of Information Employing Statistical Methods

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