

## Wiley, Melissa, VBAVACO

---

**From:** Li, Stephanie, VBAVACO  
**Sent:** Wednesday, October 31, 2018 8:19 AM  
**To:** Wiley, Melissa, VBAVACO  
**Subject:** FW: OMB Passback and briefing request - AQ42  
**Attachments:** AQ42(IF) LGY Reg to OMB via ROCIS (9-18-18)-Revisions to VA Guaranteed or Insured Cash out home \_ Passback 1.docx

The request to submit as emergency processing is actually a comment bubble in the rule passback. See page 27 of attached – you could probably just save as a PDF page and attach.

Stephanie

**From:** Martin, Jeffrey M  
**Sent:** Thursday, October 18, 2018 3:35 PM  
**To:** Raffaelli, Dana (OGC) <Dana.Raffaelli2@va.gov>; Simpson, Joseph (OGC) <Joseph.Simpson@va.gov>; Stewart, Deborah, VBAVACO <Deborah.Stewart1@va.gov>; Bell, John III, VBAVACO <John.Bell7@va.gov>; Nelms, Gregory W., VBAVACO <Gregory.Nelms@va.gov>; Bryant, Eric, VBAVACO <Eric.Bryant2@va.gov>; Morrison, Iyabo, VBAVACO <Iyabo.Morrison@va.gov>; Drumm, Elysium, VBAVACO <elysium.drumm@va.gov>; Li, Stephanie, VBAVACO <Stephanie.Li@va.gov>  
**Cc:** Shores, Michael <Michael.Shores@va.gov>; Potts, Luvenia (Fran) <luvenia.potts@va.gov>  
**Subject:** OMB Passback and briefing request - AQ42

Good afternoon all,

Please see the note below from OMB and their request to have a call and their availability. Given those times, please let us know what works for your team and we will schedule the call.

Finally, see the passback with tracked changes. Provide your responses to their comments in tracked changes. Given the statutory deadlines we are bumping against, we would like to have these resolved as soon as we can. Note the RIA is following closely behind.

Thanks,  
Jeff

-----Original Message-----

**From:** Tatham, Steph J. EOP/OMB]  
**Sent:** Thursday, October 18, 2018 3:17 PM  
**To:** Shores, Michael <Michael.Shores@va.gov>; Martin, Jeffrey M <Jeffrey.Martin6@va.gov>; Potts, Luvenia (Fran) <luvenia.potts@va.gov>  
**Subject:** RE: [EXTERNAL] RE: Briefing request RIN 2900-AQ42

Thanks so much. Attached please find our passback on the reg document. I'll send the RIA separately later today or tonight. WHCO would like a call with VA OGC to discuss the comments flagged as "legal" and for which discussion is requested in the comment bubble. Here is our availability: 10/19 2:00-3:30pm or 4-5pm; 10/23 1-2pm or 4-5pm; 10/24 10am-12pm.

that require approval by OMB. Accordingly, under 44 U.S.C. 3507(d), VA has submitted a copy of this rulemaking action to OMB for review with a request for emergency processing.

OMB assigns control numbers to collections of information it approves.

VA may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Section 36.4306 contains a collection of information under the Paperwork Reduction Act of 1995. If OMB does not approve the collection of information as requested, VA will immediately remove the provisions containing a collection of information or take such other action as is directed by OMB.

Comments on the collections of information contained in this final rule should be submitted to the Office of Management and Budget, Attention: Desk Officer for the Department of Veterans Affairs, Office of Information and Regulatory Affairs, Washington, DC 20503 or emailed to [OIRA\\_Submission@omb.eop.gov](mailto:OIRA_Submission@omb.eop.gov), with copies sent by mail or hand delivery to the Director, Regulation Policy and Management (00REG), Department of Veterans Affairs, 810 Vermont Avenue, NW, Room 1068, Washington, DC 20420; fax to (202) 273-9026; or submitted through [www.Regulations.gov](http://www.Regulations.gov). Comments should indicate that they are submitted in response to "RIN 2900-AQ42 – Loan Guaranty: Revisions to VA-Guaranteed or Insured Cash-out Home Refinance Loans."

OMB is required to make a decision concerning the collections of information contained in this final rule between 30 and 60 days after publication

**Commented [A32]:** Emergency processing and a limited 6 month approval is available for interim final rule. If this rule proceeds as an interim final rule then VA should submit under emergency processing procedures and plan to complete the ordinary PRA process by the end of the 6 month approval period.

Please provide us with a copy of the draft supporting statement for this collection. We'd like to review it in tandem with the rulemaking. Thank you.