

**SUPPORTING STATEMENT  
FOR COLLECTION OF INFORMATION UNDER 38 C.F.R. 36.4350  
OMB 2900-0530**

A. Justification

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

The Department of Veterans Affairs (VA) Loan Guaranty program guarantees loans made by private lenders to Veterans for the purchase, construction, and refinancing of homes owned and occupied by Veterans. Under 38 C.F.R. 36.4350, a holder of a loan guaranteed or insured by VA is required to develop and maintain a loan servicing program. This authority specifically sets forth certain minimum actions that a holder must include in its collection procedures against borrowers in various stages of delinquency. Holders are required to, among other things, notify VA on delinquent loans, establish contact with the borrower to determine why payment was not made, determine the financial circumstances of the borrower, or established a reason for the default. The holder is required to solicit sufficient information to properly evaluate the prospects for curing the default and whether granting of forbearance or other relief assistance would be appropriate before any foreclosure decisions. Furthermore, holders are required to provide available statistical data on delinquency and foreclosure rates and their analysis of such data to VA upon request.

- 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.**

This information is provided by loan servicers. In 2008, greater reliance was placed on the private-sector servicing in accordance with VA guidelines, with VA using advanced technology to oversee holder actions. The information collected is used by VA to ensure that servicers who participate in VA Loan Guaranty program adhere to VA statutes, regulations and procedures for curing defaults and preventing foreclosure.

- 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.**

VA does not use a form to collect this information. This information is collected by VA electronically via the VA Loan Reporting and Electronic Interface.

- 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.**

Program reviews were conducted to identify potential areas of duplication; however, none were found to exist. There is no known Department or agency which maintains the necessary information, nor is it available from other sources within our Department.

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

This collection of information does not involve small businesses.

- 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.**

If this information is not collected, Veteran borrowers would be at increased risk of foreclosure and homelessness.

- 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 CFR 36.4300 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 February 26, 2021, Volume 86, No. 37, page 11840.

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

Decisions to provide any payment or gift to respondents does not apply.

**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) are contained in the Privacy Act Issuances, 2014.

**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:**

Estimate of Information Collection Burden.

- a. Number of Respondents: 427
- a. Frequency of Response: One-time
- b. Annual Burden Hours: 63 hours
- c. Estimated Completion Time: 1 minute
- d. The respondent population for collection of information under 38 C.F.R. 36.4350 is composed of individuals loan officers and agents, collection analysts, loan servicing officers, and loan underwriters. VA 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 loan officer general wage code 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 hourly wage is \$36.99, based on the BLS wage code "13-2072 for Loan Officers –" This information was taken from the following website: [https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/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 \$2,589.30 (70 burden hours x \$36.99 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).**

There are no additional costs to servicers, holders or record keepers resulting from this collection, as VA has been collecting this information electronically since 2008. VA does not assume any startup cost associated with any required software or information technology upgrades necessary to submit the information electronically. Currently, federal housing programs require lenders to submit loan origination files electronically, at or before delivery of all loans as part of an ongoing initiative to enhance loan quality and consistency. As such, mortgage companies are equipped with the technology to submit loan data as computable electronic information and in a format such as Mortgage Industry Standards Maintenance Organization (MISMO) (e.g., XML data file). As such, costs that are associated with total capital and start-up component (annualized over its expected useful life) and total operation and maintenance and purchase of services component are a standard part of mortgage companies' business. Any costs for updates are customary and usual business practice for the mortgage industry. Since there are no additional costs beyond standard business practice, there are no reportable cost estimates that may be expected.

**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 are accessible through this link <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/RUS.aspx>.

Grade	Step	Burden Time	Hourly Rate	Cost Per Response	Total Responses	Total
11	1	1 min	\$29.98	\$0.50 (\$29.98/60 minutes)	427	\$213.50
Overhead at 100% Salary						\$213.50
<b>Overhead costs are 100% of salary and are same as the wage listed above and the amounts are included in the total.</b>						
Processing / Analyzing Costs						\$0
Printing and Production Cost						\$ 0
Total Cost to Government						\$213.50

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

The figures presented reflect current loan volumes. VA does not have a visibility of prior hours.

**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 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.

Request continue with extension of an already approved collection for 3 years from the date of expiration.

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

This information collection fully complies with all the requirements of 5 CFR 1 320.8(b)(3).

**B. Collection of Information Employing Statistical Methods**

This collection of information by the Veterans Benefits Administration does not employ statistical methods.