

**SUPPORTING STATEMENT
VA LOAN ELECTRONIC REPORTING INTERFACE (VALERI) SYSTEM
OMB 2900-0021**

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 provides the authority for VA-guaranteed mortgage servicers to assist Veteran borrowers and their families experiencing financial difficulty. VA then provides oversight of the servicers' actions by collecting specific documentation and data. In today's environment, this collection is done via the VALERI application. Federal Regulations under 38 CFR 36.4300 require specific, critical information be provided to VA and without the collection of such documentation and data, the number of foreclosures of VA-guaranteed loans and homeless Veterans would increase. Federal Regulation under 38 CFR 36.4807 also requires servicers to report information consistent with the partial claim payment home retention option authorized under 38 CFR 36.4800 *et seq.*

- 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. VA has moved toward placing greater reliance on private-sector servicing in accordance with VA guidelines, with VA using advanced technology to oversee holder actions.

- 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.**

The Agency has adopted advances in telecommunications and other technology to minimize the impact to the industry. A new internet-based reporting system has replaced the following OMB-approved forms: 26-6850, 26-6850a, and

26-6851 (OMB Collection #2900-0021), 26-567 (OMB Collection #2900-0131), 26-8903 (OMB Collection #2900-0381), 26-1874 and 26-1874a (OMB Collection #2900-0362), and 26-8778 (OMB Collection #2900-0251).

- 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.

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

The 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.**

Certain portions of this information collection consist of a monthly reporting burden of a servicer's portfolio. This collection is necessary in order for VA to responsibly meet its obligations to oversee loan holder actions.

- 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 December 9, 2020 at 85 FR 79142, pages 79157-79158 as part of VA's proposed rule RIN 2900-AR05, Loan Guaranty: COVID-19 Veterans Assistance Partial Claim Payment Program. While public comments were received on the proposed rule, no specific comments were received regarding this information collection.

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.

Privacy to the extent permitted by law is covered by VA System of Records Loan Guaranty Home, Condominium and Manufactured Home Loan Applicant Records Specially Adapted Housing Applicants Records, and Vendee Loan Applicant Records – VA (55VA26) are contained in the Privacy Act Issuances, 2014 Compilation.

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 are contained on the form.

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

Estimate of Information Collection Burden.

a. Number of Respondents: 967

a. Frequency of Response: one-time

b. Annual Burden Hours: 70 hours

c. Estimated Completion Time: 1 minute

d. The respondent population is composed of loan servicers. VBA used general wage data for Loan Officers to estimate the respondents' costs associated with completing the information collection. Data includes mortgage loan officers and agents, collection analysts, loan servicing officers, and loan underwriters.

The Bureau of Labor Statistics gathers information on full-time wage and salary workers. Accordingly, the median weekly earnings of full-time wage and salary worker is \$1,465.60. Assuming a forty (40) hour work week, the median hourly wage is \$36.64.

The general wage code 13-2072 for “Loan Officers” may be found by clicking this link: https://www.bls.gov/oes/current/oes_nat.htm, May 2019.

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 \$2,564.80 (70 burden hours x \$36.64 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 are accessible through this link: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/GS_h.pdf

Grade	Step	Burden Time	Hourly Rate	Cost Per Response	Total Responses	Total
12	10	1 min (0.02)	\$41.63	0.83 (41.63 x 0.02)	967	\$ 805.12
Overhead at 100% Salary						\$ 805.12
<i>Note: GS-12 completes 90% of the time. On occasion GS-13 or GS-14 may complete.</i>						
Overhead costs are 100% of salary and are same as the wage listed above and the amounts are included in the total.						
Processing / Analyzing Costs						\$ 805.12

Printing and Production Cost	\$ 0
Total Cost to Government	\$805.12

The processing time estimates above are based on the actual amount of time employees of the grade level spend to process to completion a claim received.

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

As discussed in the proposed rule, VA does not estimate any change in the average burden per response as servicers are already required to report activity on every VA-guaranteed loan in their servicing portfolio, regardless of the home retention option pursued. The amendment to this information collection associated with 38 CFR 36.4807 simply adds partial claim and its associated data elements to the list of available home retention options.

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.

VA does not publish this information or make it available for publication.

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.

This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

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