

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

**Summary of Changes from the Previously Approved Collection**

- The reduction in respondents per year resulted in a decrease in burden hours from the previous 1,000 hours to the current combined C&V/SAH annual burden of 160 hours.
- No comments were received during the 60-Day comment period.

**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 is revising this collection to reduce the Letter of Recommendation (LOR) requirements for all licensed or certified real estate appraisers and/or Specially Adapted Housing (SAH) compliance inspectors that want to submit a VA Form 26-6681 (fillable printable) application to be considered for the VA Fee Appraiser Panel or VA Compliance Inspector Panel.

On December 27, 2022, the President signed into law the *Improving Access to the VA Home Loan Benefit Act of 2022* (Act), P.L. 117-308, 136 Stat. 4393. Section 3(a) of the Act mandates that the Secretary of Veterans Affairs shall prescribe updated regulations or program requirements for who is eligible to conduct an appraisal for a loan guaranteed by the Department of Veterans Affairs under chapter 37 of title 38, United States Code, for any purpose described in section 38 U.S.C. 3710(a) and 3731(a).

The submitted revision to reduce the appraiser LOR requirements of 38 U.S.C. 3731(a) where the Secretary shall “. . . prescribe uniform qualifications for appraisers, including the successful completion of a written test, submission of a sample appraisal, certification of an appropriate number of years of experience as an appraiser, and submission of recommendations from other appraisers. . .”

Currently, VA Form 26-6681, Section 22 requires three LORs to be part of the application for all licensed or certified appraisers and/or SAH compliance inspectors. In order to reduce the LOR burden and increase recruitment activities in rural areas of the country and U.S. Territories, VA took strict interpretation of 3710(a) “. . . submission of recommendations from other appraisers. . .” to mean only two LORs were required instead of the current three LORs. This revision aligns with recent changes to VA policy and future program changes required by the Act.

VA uses fee-based appraisers to appraise residential real estate and recommend value for loan purposes and roster-based compliance inspectors to verify compliance of individual construction phases for all SAH and Special Housing Adaptation (SHA) grant projects in which grant funds are being disbursed to a builder.

A VA 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.

A VA compliance inspector is a qualified person by the Secretary under 38 U.S.C. chapter 21 that provides authority to assist certain disabled Veterans in acquiring specially adapted housing. Section 2101(c) explains that benefits afforded under this chapter shall be provided in accordance with regulations prescribed by the Secretary. Pursuant to this authority, 38 C.F.R. 36.4408 provides that the Secretary may, at any time, require submission of such proof of costs and other matters as the Secretary deems necessary.

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 (fillable printable) is used to collect information on the fee personnel and compliance inspector applicant's background and experience in the real estate valuation field. VA uses the data on the form to evaluate the applicants' experience for the purpose of designating qualified individuals to serve on the fee roster. Qualifications are stated in 38 U.S.C. 3731(a).

Upon receipt of the form, the Valuation or Adaption Officer or designee 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, VA Form 26-6681 applications are reviewed by the Fee Panel Committee and designation or rejection of applicants' recommendation is made to the Assistant Director, Field, Construction and Valuation (AD C&V) or the Assistant Director, SAH (ADSAH). If an applicant is designated, he or she is notified by letter from the AD C&V or ADSAH. 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 and roster 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.**

Considering the small volume of fee- or roster-based applicants, VA does not believe that automation would be cost effective for itself or the fee-basis inspectors who complete the form. VA Form 26-6681 requires very specific information collected in the field at the time the inspection is performed. To encourage continued participation in the VA Loan Guaranty program, VA works to avoid forcing inspectors to automate their use of VA Form 26-6681 in ways that are not cost effective for them. Therefore, VA has no current plans to automate the use of this form. VA Form 26-6681 is located on the VA Forms website in a fillable electronic format.

**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 is not contained in any other VA records. Similar information is not available elsewhere.

**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. VA obtains the services of fee and roster 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 the 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.**

A 60-Day Federal Register Notice for the collection published on Monday, April 8, 2024. The 60-Day FRN citation is Volume 89 FRN 24571 page 24571.

A 30-Day Federal Register Notice for the collection published on Tuesday, June 25, 2024. The 30-Day FRN citation is Volume 89 FRN 53181 page 53181.

**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.**

17VA26 (2023 publication) - Loan Guaranty Fee Personnel and Program Participant Records-VA - The documents in this system are applications by individuals to become VA-approved fee basis appraisers, compliance inspectors, fee attorneys, or management brokers and contain information including identifying information such as Social Security Number, taxpayer identification numbers, contact information and professional qualifications.

**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:** Combined 319 per year. C&V Business line: 239 (based on average respondents over 7 years). SAH Business line: 80 (based on average 10 per 8 field offices per year)

**b. Frequency of Response:** One-time.

**c. Annual Burden Hours:** Combined 160 hours. C&V Business line 120 hours. SAH Business line 40 hours.

**d. Estimated Completion Time:** 30 minutes per form for each business line.

**e. The respondent population** for VA Form 26-6681 is composed of fee appraisers and compliance inspectors who are requesting to be on the VA Fee Panel and VA CI Panel.

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 \$38.68 based on the BLS wage code – “13-2020: Property Appraisers and Assessors.” 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 \$6,188.80 (160 burden hours x \$38.68 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.

The estimated cost breakdown for both C&V and SAH business lines are broken down below.

Estimated Costs to the Federal Government are accessible from the following website: [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/GS\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/GS_h.aspx)

Construction and Valuation (C&V) Business Line

Grade	Step*	Burden Time Employee	Hourly Wage Rate	Cost per Response	Total Responses**	Govt. Cost
GS-15 AD C&V	5	20 Minutes (0.33)	\$66.82	\$22.05 (0.33 x 66.82)	239	\$5,269.95
GS-14 VO	5	30 minutes (0.50)	\$56.80	\$28.40 (0.50 x \$56.80)	239	\$6,787.60
GS-13 AVO	5	45 minutes (0.75)	\$48.07	\$36.05 (0.75 x 48.07)	239	\$8,615.95
GS-7/9/11/12	5	60 minutes (1.00)	\$31.21	\$31.21 (1.00 x 31.21)	239	\$7,459.19
Overhead at 100%. Overhead costs are 100% of salary, which are also the same as the wage listed above; and the amount is included in the total.						
Education Liaison Representative Processing/ Analyzing Cost:						\$0.00
Printing and Production Cost:						\$0.00
Total Cost for C&V:						<b>\$28,132.69</b>

\*Used average step due to so many employees in different offices review and approve the application.

\*\*Cost per response depending on where the need for recruitment in each state and county. Total responses are based on applications received over 7 years (1,673 total applications from 2017-2023 divided by 7 years).

SAH Business Line

Grade	Step*	Burden Time Employee	Hourly Wage Rate	Cost per Response	Total Responses**	Govt. Cost
GS-15 ADSAH	5	30 minutes (0.50)	\$66.82	\$33.41 (0.50 x 66.82)	80	\$2,672.80
GS-14 AO	5	30 minutes (0.50)	\$56.80	\$28.40 (0.50 x 56.80)	80	\$2,272.00
GS-13 AAO	5	45 minutes (0.75)	\$48.07	\$36.05 (0.75 x 48.07)	80	\$2,884.00
GS-12 SAH Coordinator	5	90 minutes (1.50)	\$40.42	\$60.63 (1.50 x 40.42)	80	\$4,850.40
Overhead at 100%. Overhead costs are 100% of salary, which are also the same as the wage listed above; and the amount is included in the total.						
Education Liaison Representative Processing/ Analyzing Cost:						\$0.00
Printing and Production Cost:						\$0.00
Total Cost for SAH:						<b>\$12,679.20</b>

\*Used average step due to so many employees in different offices review and approve the application.

\*\*Cost per response depending on where the need for recruitment in each state and county.

<b>Total Cost to Government:</b>	<b>\$40,811.89</b>
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The processing time estimates above are based on the actual amount of time employees of each grade level spends to process VA Form 6681 from review to final approval by the AD C&V and ADSAH.

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

The reduction in burden hours was accomplished by reevaluating the number of respondents that was previously over-estimated in 2021 at 2,000 respondents per year to the current C&V and SAH combined 319 respondents per year. The C&V Business line contributes 239 respondents per year (based on the actual average respondents over 7 years) and the SAH Business line contributes 80 respondents per year (based on average 10 per 8 field offices per year). The reduction in respondents per year resulted in a decrease in burden hours from the previous 1,000 hours to the current combined C&V/SAH annual burden of 160 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.**

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 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.