

**SUPPORTING STATEMENT
ESTABLISHING PROPERTY SUITABILITY FOR
VA SPECIALLY ADAPTED HOUSING
NEW - OMB REFERENCE NUMBER: 202503-2900-014**

Summary of Changes

This is the first submission of this information collection request. As a new collection, it reflects an increase in burden.

1 public comment was 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.**

The information collected in the Establishing Property Suitability for VA Specially Adapted Housing process assists Veterans who are entitled to adapted housing grants itemized under 38 U.S.C. Chapter 21 §2101 (a) who may use their benefit to “acquire a suitable housing unit” that will provide a barrier-free living space based on “the nature of the Veteran’s disability”. Per 38 U.S.C. Chapter 21 §2101 (a)3, determinations must be made regarding the feasibility and suitability of a proposed property. Information must be gathered to make such determinations. 38 CFR § 36.4404 (b) requires that the VA establish if it is medically feasible for the Veteran to reside outside an institutional setting, that the proposed housing unit is suitable for the Veteran’s needs and that the cost of the proposed housing unit bears a proper relation to the Veteran’s present and anticipated income and expenses. The information being sought is both required and necessary to make an accurate analysis that may support these conclusions.

The information allows VA to determine factors such as suitability of a proposed or existing housing unit by gathering evidence of physical barriers to ingress / egress, access to personal hygiene facilities, and how best to facilitate activities of daily living. When appropriate it allows VA to include assessments of the surrounding environment and factors that would limit or prevent adaptation of the current or planned housing unit. The information also allows VA to make a practical determination regarding how the most feasible adaptations could be delivered based on the Veteran’s current and future needs. Finally, the information allows the VA to determine if the Veteran will reasonably afford the proposed housing unit.

The Report of Loan Guaranty Existing Housing Unit Inspection of SAH Property Suitability (VA Form 26-1858a-ARE), Report of Loan Guaranty SHA Property Suitability (VA 26-1858b), Report of Loan Guaranty SAH Vacant Lot Inspection (VA Form 26-1858c-ARE), Report of Loan Guaranty Final SAH/SHA Field Review (VA Form 26-1858d) are used to assess the suitability and condition of properties under the VA’s Specially Adapted Housing (SAH) program.

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 Specially Adapted Housing staff gather documentation in both hardcopy and digital forms. Most frequently it is gathered from eligible Veterans, their appointed representatives, or building professionals who are directly associated with the prospective construction project. Analysis and determination of suitability and feasibility are the purposes. Such determinations are integral to delivering housing adaptation benefits described in 38 U.S.C, Chapter 21. The documents may include the following forms: Report of Loan Guaranty Existing Housing Unit Inspection-SAH Property Suitability 26-2858a; Report of Loan Guaranty SHA Property Suitability 26-1858b; Report of Loan Guaranty SAH Vacant Lot Inspection, 26-1858c; Report of Loan Guaranty Final SAH/SHA Field Review. Photographs depicting all areas of concern around the proposed home or the proposed build site along with a diagram or map with pertinent measurements are also requested in order to perform an appropriate analysis and are provided by the Veterans or their representatives.

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 Forms 26-1858 ARE (Series A-D) are currently available on the VA forms website (<http://www.va.gov/vaforms>) in a fillable electronic format.

Documents can be sent and received electronically via email and are stored electronically. Some documents can be completed via computer but may still require a pen and ink signature. Such documents may be printed, signed, scanned into a computer, and delivered via email or returned via regular mail. Some information is photographic or graphic in nature and provides essential information regarding the current or proposed housing unit. The use of technology is sometimes limited by internet availability in parts of the world eligible Veterans reside or by a Veteran's ability to utilize available technology. In rare instances documents may be sent or received by fax but is scanned and stored electronically once received.

Use of electronically submitted information both graphic and text is considerably more efficient than traditional mail and is used whenever practical. The majority of respondents have familiarity and access to the appropriate technology to reduce the burden of having to mail or fax documents.

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.

In a limited number of instances, photos and floorplan diagrams may be found in Veteran associated VA loan records. In those instances, they are used in whole or in part but are often not sufficient in detail or scope to fulfill all program requirements. Such information is included whenever appropriate to reduce or remove the burden on respondents.

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

The information collected does not have a significant economic impact on a substantial number of small entities.

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 collection is necessary to determine if the minimum conditions exist to deliver a housing grant. Unless the Veteran's conditions or circumstances change during the grant development process, a typical grant use only requires one collection of such information. If the information were not collected or collected less frequently, it would not be reasonable to deliver the benefit or safeguard the public trust. Such collections are mandated by 38 U.S.C Chapter 21, §2101(a)3 and 38 CFR § 36.4404 (b) as previously cited.

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.

This collection generally requires respondents to provide information one time per grant use process. Exceptions may include the following: The proposed property is damaged or impacted by disaster or misfortune or if the Veteran chose to use their adapted housing benefit on a different property, then an additional site suitability study and additional documentation would be required. Likewise, if significant modifications are made to a home during the development of a grant for approval, it may be necessary to account for the changes and how they may impact the construction plan. It should be noted that such special circumstances are rare. The information collection does not otherwise involve special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5.

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.

A 60-Day Federal Register Notice (FRN) for the collection published on Monday, November 24, 2025. The 60-Day FRN citation is 90 FRN 53066.

1 Comment Received:

Comment Received from: Stacy Komar

Knowing that my conditions are directly related to military service, I am going on public record with my comment requesting the following changes. This would include working with the agencies outlined and associating my injuries directly with what I want to remedy within my household to further ensure "barrier free living". I would like them to take into consideration that I am certainly not the only one experiencing the above. I would like a more preventative approach to occur and taken into consideration.

However, I also understand that certain stipulations would have to be written and in place. These include the Veteran working directly with their County Veteran Service Officer, who would be acting on behalf of this bill proposal and ensuring services are met. Further regulating and implementing the proposal could include the following:

- 1) Proof that the condition meets the proposed remedy (ex. converting a tub/shower into a walk-in shower)
- 2) A cap on grant money received for each project and how it aids the individual Veteran in the long run for them to be able to successfully continue to reside in their home and
- 3) Mutual agreements between Veteran and agencies with the understanding that conversions may hurt long-term resell value. With appropriate legal signatures and understanding, the Veteran applying is confirming that they are committed and desire to stay in their home long-term until they physically cannot or for other identified reasons are not able to do so (i.e. job loss, financial hardship, accident, death... etc.) I recommend the above in attempts to serve as a preventative measure and ensure that myself and those I have served alongside are taking proactive steps to mitigate a longer-term problem. Wisconsin previously had three long-term care facilities that cater specifically to Veteran's. All are closed or are in danger of closing permanently as a result of budgetary and administrative policies and procedures. Therefore, we cannot continue to rely on the reactionary methods of the past as demonstrated within the below, coming from directly from the Department of Veteran Affairs proposal and rather serve as a soundboard and strive for measures wherein we can continue to live and thrive within our lives and communities.

VA Loan Guaranty Service Response:

The Department of Veterans Affairs (VA) Loan Guaranty Service acknowledges receipt of your public comment regarding the Control Number for Establishing Property Suitability for VA Specially Adapted Housing. The feedback regarding improving accessibility, enabling Veteran's to remain in their homes safely, and ensuring preventive measures are considered valuable to the Department as we evaluate proposed information collection requirements and related program delivery. We are committed to supporting Veterans' ongoing ability to live safely and independently in their homes and appreciate your input.

Your input has been noted and will be included in our official record of public comments during the 30-day notice.

A 30-Day Federal Register Notice for the collection published on Thursday, May 7, 2026. The 30-Day FRN citation is 91 FRN 24963.

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 are 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.

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 System of Records that published in the Federal Register at 88 FR 63686 on September 15, 2023.

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 contained on the forms.

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

The collection burden is variable based the type of grant the Veteran is eligible for and the location of the proposed housing unit. The collection burden is less for properties located proximate to VA SAH staff employee, as they can perform the site suitability collection without requiring the Veteran or representative to provide anything beyond access to the proposed property. Veterans using the 2102(a) or (b) grants have the lowest respondent burden.

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.

The burden to Veteran or Veteran caregiver depends on the time it takes to generate and gather documentation to demonstrate feasibility and suitability. The wage used for eligible Veteran/caregiver is based on the average monthly income as reported by SAH Veterans in FY2023.

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 used for the Eligible Veteran/Representative is \$31.48 based on the BLS wage code – “00-0000 All Occupations”. [2024 Occupational Employment and Wage Statistics Data](#)

Description of Information Collection	Frequency of Response	Total Annual Responses	Hours per Response	Annual Burden Hours	Collector Occupation	Hourly Cost	Total Annual Cost
SAH/SHA Grant Conditional Approval Determination							
VA Form 26-1858a	1	2076	0.25 (15 min)	519 hrs (31140 min)	Eligible Veteran / representative	\$32.66	\$16,951
VA Form 26-1858b	1	100	0.25 (15 min)	25 hrs (1500 min)	Eligible Veteran / representative	\$32.66	\$817
VA Form 26-1858c	1	300	0.25 (15 min)	75 hrs (4500 min)	Eligible Veteran / representative	\$32.66	\$2,450
VA Form 26-1858d	1	2076	0.25 (15 min)	519 hrs (31140 min)	Eligible Veteran / representative	\$32.66	\$16,951
Photos and measurements	1	2076	0.75 (45 min)	1557 hrs (93420 min)	Eligible Veteran / representative	\$32.66	\$50,852
Total Burden							\$88,021

Estimate of the Information Collection Burden:

a. Estimated Annual Burden: 2,695 Hours

- b. Estimated Average Burden Per Respondent:*
- 15 minutes (to complete forms)
 - 45 minutes (to take photos and measurements).
- c. Frequency of Response: Annually.*
- d. Estimated Number of Respondents: 6,628.*

The respondent population is composed of SAH/SHA eligible Veterans and/or their representative, the Veterans' physicians/primary care providers, and building contractors.

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.

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 recordkeeping, capital, start-up, or maintenance costs associated with this information collection.

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 processing time estimates below are based on the actual amount of time employees of the identified grade levels spend processing the Conditional Approval phase of SAH or SHA grants.

SAH\SAH Conditional Grant approvals

Description of Information Collection	Frequency of Responses	Total Annual Responses	Hours per Response	Annual Burden Hours	Employee Grade Level	Employee Hourly Wage	Total Annual Cost
VA Form 26-1858a	1	2076	.75 (45 min)	1557	GS-12, Step 5	\$55.07	\$ 85,744
VA Form 26-1858b	1	54	.33 (20 min)	18	GS-12, Step 5	\$55.07	\$991
VA Form 26-1858c	1	40	.33	13.2	GS-12, Step 5	\$55.07	\$728

			(20 min)				
VA Form 26-1858d	1	2076	.75 (45min)	1557	GS-12, Step 5	\$55.07	\$85,744
Photos and measurements	1	2076	.17 (10 min)	352.92	GS-12, Step 5	\$55.07	\$19,436
Total Annual Cost to Government							\$192,676

The annualized cost estimates for the Federal Government are based on OPM income tables per hour basis for a GS-12, step 5, SAH Agent, \$55.07 per hour.

Estimated costs to the Federal Government are accessible through this link:
https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/25Tables/html/RUS_h.aspx

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

This is the first submission of this information collection request. As a new collection, it reflects an increase in burden.

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.