

**SUPPORTING STATEMENT
VA LOAN ELECTRONIC REPORTING INTERFACE (VALERI) SYSTEM and TITLE
REQUIREMENTS FOR CONVEYANCE OF REAL PROPERTY TO THE SECRETARY
OMB #2900-0021**

Summary of Changes from the Previously Approved Collection

VA is submitting this change to update the VA Loan Electronic Reporting Interface (VALERI) System and Title Requirements for Conveyance of Real Property to the Secretary data elements on the VALERI Events Bulk Upload Template to align with newly enacted statutory requirements (38 U.S.C. §§ 3737 and 3732(d)) and VA Circulars (26-25-2 and 26-24-2).

- Circular 26-25-2, Veterans Affairs Servicing Purchase (VASP) Program data elements were removed from the VALERI Events Upload Template on September 1, 2025, due to program wind-down.
- Circular 26-24-2, COVID-19 VA Partial Claim Program (VAPCP) and Refund Modification data elements were removed from the VALERI Events Upload Template on January 1, 2026, due to expiration of the COVID authorities. These data elements are no longer required because VA retired from the VAPCP and Refund Modification program.
- New Loss Mitigation Waterfall and Partial Claim Program data collections are implemented, which introduces additional data elements to the VALERI Events Upload Template, with associated documentation.
- There is an increase in the respondent count from 16,509 to 39,744 compared to the previous OMB approval, which contributed to a burden increase from 3,027 to 43,751. Although VASP and COVID-19, were removed from the bulk upload template, new VA Partial Claim and Waterfall data elements will be added. Additionally, due to timing and transitioning issues, some Veterans Affairs Servicing Purchase (VASP) Program-related data elements remained in the existing bulk upload template at the time of approval and are now being removed.
- Two public comments were received during the 60-Day notice public 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 provides the authority for VA-guaranteed mortgage loan servicers to assist Veteran borrowers and their families experiencing financial difficulty. VA then provides oversight of the loan servicers' actions by collecting specific documentation and data. In today's environment, this collection is done via the VALERI application. Federal Regulations under 38 C.F.R. 36.4300 et seq. require specific, critical information to 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.

On July 30, 2025, the President signed the VA Home Loan Program Reform Act into law. See, e.g., Pub. L. No. 119-31; 38 U.S.C. §§ 3737, 3732(d). Section 3737 authorizes VA to make Partial Claims to save Veterans from foreclosure. Section 3732(d), requires VA to prescribe a mandatory sequence of loss mitigation options (Loss Mitigation Waterfall), including the Partial Claim option, that loan servicers must follow. In addition to other program features, VA can require loan servicers to take any actions necessary to establish Partial Claims but must compensate loan servicers appropriately for such actions. VA must also conduct oversight and audit the program.

VA will soon launch the Loss Mitigation Waterfall and the Partial Claim Program. Loan servicers will then review delinquent VA-guaranteed loans using the Loss Mitigation Waterfall to identify cases that may potentially qualify for a VA Partial Claim. Loan servicers will report qualified cases to VA for automated evaluation, and if approved, the loan servicer will establish a trial payment plan (TPP). Upon successful completion of the TPP, the loan servicer will advance the amount needed to reinstate the loan, and report this advance to VA. VA will review and, if all qualifying criteria are met, will reimburse the loan servicer for the advanced amount.

VA is also retaining information collections that are necessary for when loss mitigation efforts are unsuccessful, and a VA-guaranteed loan goes into foreclosure. Statutory requirements for conveyance of properties to the Secretary are found in chapter 37 of title 38, United States Code. The implementing regulations are found in part 36 of title 38, Code of Federal Regulations (C.F.R.). In 38 C.F.R. § 36.4323, titled "Election to convey security", VA explains that each conveyance or transfer of real property to the Secretary pursuant to this section shall be acceptable if:

The holder thereby covenants or warrants against the acts of the holder and those claiming under the holder (e.g., by special warranty deed); and it vests in the Secretary or will entitle the Secretary to such title as is or would be acceptable to prudent lending institutions, informed buyers, title companies, and attorneys, generally, in the community in which the property is situated.

The collection of information specifies documents that loan servicers must submit to VA before VA can determine whether the regulatory standard has been met. The regulation also provides that the Secretary may request other evidence as the Secretary determines reasonably necessary. It is impossible for VA to identify, in advance, every document VA may need before determining that the regulatory standard has been met. However, VA attempts to provide some degree of uniformity when requiring "other evidence," and periodically issues additional clarification.

In November 2025, under OMB control number 2900-0021, VA received the most recent approval through December 31, 2028, to collect information associated with holders (loan servicers) reporting of a default and subsequent notice of intention to foreclose on a loan guaranteed under 38 U.S.C. chapter 37. See 38 U.S.C. § 3732.

Specifically, this collection of information pertains to situations where a holder acquires a property secured by a VA-guaranteed loan through a liquidation sale or acceptance of a deed-in-lieu of foreclosure and elects to convey that property to VA. See 38 U.S.C. § 3732. The procedures implementing the statutory authority are found in 38 C.F.R. § 36.4323. This collection was previously approved under OMB control number 2900-0381, which has expired.

Pursuant to § 36.4323(a), in order for VA (the Secretary) to accept conveyance of the property, the holder must notify the Secretary by electronic means no later than 15 calendar days after the date of liquidation sale (i.e., the event which fixes the rights of the parties in the property, such as the date of foreclosure sale, date of recordation of a deed-in-lieu of foreclosure, or confirmation/ratification of sale date when required under local practice) that the holder elects to convey the property to the Secretary. 38 C.F.R. § 36.4323(a).

Pursuant to § 3732, if the calculation by the holder shows that the net value is equal to or less than the unguaranteed portion of the loan (i.e., the total indebtedness minus VA's maximum claim payable under the guaranty), conveyance is prohibited. See also 38 C.F.R. § 36.4323(b). However, the holder may desire to convey the property to VA and may decide to waive a portion of the indebtedness to the extent that the property may be conveyed under 38 U.S.C. 3732(c). 38 C.F.R. § 36.4323(b). In such a case, the holder must provide the notice described in § 36.4323(a), and must subsequently waive that portion of the total indebtedness remaining after application of the net value amount and VA's guaranty claim payment. *Id.* The holder must send the borrower(s) a notice describing the amount of indebtedness that has been waived no later than 15 calendar days after receipt of the guaranty claim. *Id.* Section 36.4323(c) provides that the holder, in accounting to the Secretary in connection with the conveyance of any property pursuant to § 36.4323, may include as a part of the indebtedness all actual expenses or costs of the proceedings, paid by the holder, within the limits defined in § 36.4314. 38 C.F.R. § 36.4323(c). Section 36.4323(c) sets forth the allowed expenses.

Section 36.4323(d) provides that the notice of the holder's election to convey the property to the Secretary shall state the amount of the holder's successful bid and shall state the insurance coverage then in force, specifying for each policy, the name of the insurance company, the hazard covered, the amount, and the expiration date. 38 C.F.R. § 36.4323(d). With respect to a voluntary conveyance to the holder in lieu of foreclosure, the amount of the holder's successful bid shall be deemed to be the lesser of the net value of the property or the total indebtedness. *Id.* Coincident with the notice of election to convey or transfer the property to the Secretary or with the acquisition of the property by the holder, following such notice, whichever is later, the holder shall request endorsements on all insurance policies naming the Secretary as an assured, as his/her interest may appear. *Id.* Such insurance policies shall be forwarded to the Secretary at the time of the conveyance or transfer of the property to the Secretary or as soon after that time as feasible. *Id.* If insurers cancel policies, holders must properly account for any unearned premiums refunded by the insurer.

Occupancy of the property by anyone properly in possession by virtue of and during a period of redemption, or by anyone else unless under a claim of title which makes the

title sought to be conveyed by the holder of less dignity or quality than that required by this section, shall not preclude the holder from conveying or transferring the property to the Secretary. *Id.* Except with the prior approval of the Secretary, the holder shall not rent the property to a new tenant, nor extend the term of an existing tenancy on other than on a month-to-month basis. *Id.* The notice shall provide property tax information to include all taxing authority property identification numbers. *Id.* Any taxes, special assessments or ground rents due and payable within 30 days after date of conveyance or transfer to the Secretary must be paid by the holder. *Id.*

Each conveyance or transfer of real property to the Secretary pursuant to this section shall be acceptable if:

(A) The holder thereby covenants or warrants against the acts of the holder and those claiming under the holder (e.g., by special warranty deed); and

(B) It vests in the Secretary or will entitle the Secretary to such title as is or would be acceptable to prudent lending institutions, informed buyers, title companies, and attorneys, generally, in the community in which the property is situated.

Id. Any title will not be unacceptable to the Secretary by reason of any of the limitations on the quantum or quality of the property or title stated in § 36.4354(b). *Id.* Provided, that:

(A) At the time of conveyance or transfer to the Secretary there has been no breach of any conditions affording a right to the exercise of any reverter.

(B) With respect to any such limitations which came into existence subsequent to the making of the loan, full compliance was had with the requirements of § 36.4327. *Id.*

The acceptability of a conveyance or transfer will generally be established by delivery to the Secretary of the following evidence of title showing that title to the property of the quality specified in § 36.4323(d)(5) is or will be vested in the Secretary:

(A) A copy of the deed or document evidencing transfer of interest and title at the liquidation sale;

(B) A special warranty deed conveying the property to the Secretary;

(C) Origination Deed of Trust or Mortgage;

(D) Original or Copy of Mortgagee's Title Insurance Policy from Loan Origination (except in Iowa, where a title abstract is required);

(E) Owner's Title Insurance Policy issued after loan termination in the name of the Secretary (except in Iowa, where a title abstract is required);

(F) Loan Assignments;

(G) Appointment of Substitute Trustee (where required as part of the termination process);

(H) Estoppel Affidavit for deed in lieu of foreclosure, if required by State law and appropriate language cannot be included in the deed in lieu of foreclosure; and/or

(I) Any evidence that the Secretary may reasonably require. *Id.*

In lieu of such title evidence, the Secretary will accept a conveyance or transfer with general warranty with respect to the title from a holder described in 38 U.S.C. § 3702(d) or from a holder of financial responsibility satisfactory to the Secretary.

The VASP program is associated with OMB Control Number 2900-0934, which will be discontinued at the end of collection period, subject to Office of Management and Budget approval. VA accepted data submissions under the program until August 31, 2025. Accordingly, VA retired the VASP-related data elements, including the VASP Total Indebtedness field, from the VALERI Events Upload Template. On September 1, 2025, the previous version 26 of the Events Bulk Upload Template was replaced with a new version 27 that removed the VASP TPP Complete event and discontinued VASP data collection.

Previous versions of the VALERI Events Bulk Upload Template allowed loan servicers to report and resubmit information in response to VA's Temporary COVID-19 Veterans Assistance Partial Claim Payment program (COVID-VAPCP) and Refund Modification. Final resubmissions ended on December 31, 2025, at which time all COVID-VAPCP and Refund Modification data collection were terminated. The new version 28 of the VALERI Events Bulk Upload Template reflects the removal of the COVID-VAPCP and Refund Modification data collection is pending approval of the current proposed changes in OMB 2900-0021. On July 30, 2025, the President signed the VA Home Loan Program Reform Act into law, which requires VA to establish a new Partial Claim Program to assist Veterans in bringing their loans current and avoiding foreclosure. The new program requires new data collection on the VALERI Events Bulk Upload Template (version 29).

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. In addition, this information is used by VA to determine if an acceptable title has been received in order for VA to accept custody of the asset.

For the new Loss Mitigation Waterfall and VA Partial Claim program, within the waterfall, Loan servicers will utilize existing reporting mechanisms in the VALERI application. VA will use this information to determine if the loan servicer correctly applied the qualifying criteria and calculated the Partial Claim amount, which will allow VA to reimburse the loan servicer for the advance.

Loan servicers will review a delinquent loan under the Loss Mitigation Waterfall. When directed by the Waterfall, loan servicers will review the qualifying criteria for the Partial Claim. If the qualifying criteria are met, servicers will submit the VA Partial Claim TPP event through the VALERI system. After the VA Partial Claim TPP Event submission, VALERI will review the submission and either accept or reject the event. If VALERI rejects the event, the borrower is not qualified for a VA Partial Claim. The loan servicer will be notified to either review the event errors or continue through the Loss Mitigation Waterfall.

Upon acceptance of the VA Partial Claim TPP event and successful completion of the plan, loan servicers will advance funds to reinstate the loan and report the VA Partial Claim Payment event, again through the VALERI system.

In reporting VA Partial Claims through the VALERI system, loan servicers provide required data elements through the VALERI upload template and may upload supporting documentation necessary to process the transaction. These documents are generated in the normal course of loan servicing and are submitted as supporting records rather than standardized forms. Examples of the supporting documentation include:

- Partial Claim Attestation Document
- Partial Claim Reinstatement Quote
- Ledgers/Payment Histories
- Property Inspections
- Original Note
- Trial Payment Plan Agreement
- Additional Ledgers
- Chapter 7 Reaffirmation Agreement
- Attorney or Third-Party Invoices

Once VA reimburses the advance, the loan servicer will include the Partial Claim balance on any loan statements to the borrower, including payoff statements and monthly balance statements. These statements are provided to the borrower through the normal course of business, and not collected by VA. When monies are received for the Partial Claim, the loan servicer will remit the funds to VA, to repay the VA Partial Claim.

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. An 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). The new Partial Claim Program is currently under development, with data collection steps included in this ICR.

Electronic submission is permitted and will not change for both the VALERI system and title documentation.

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.

Of the 458 participating loan servicers, VA has sufficient data to determine their size, 36 (or 8 percent) are considered small by the Small Business Administration standards. Regarding the economic impact, that is, the paperwork burden, VA notes that the changes adopted resulted in a 33 percent reduction in the estimated per loan paperwork burden to loan servicers.

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 loan servicer's portfolio. This collection is necessary in order for VA to responsibly meet its obligations to oversee loan holder actions.

This collection is also necessary for VA to determine if acceptable title has been provided to allow the loan to be conveyed to the Secretary. If collection is not conducted, the Secretary would not be able to validate clear title on Real Estate Owned (REO) assets being conveyed to the Secretary.

Under 38 U.S.C. § 3737, VA must implement a new Partial Claim Program. VA will collect the data outlined in this ICR to determine, at a loan level, whether the program qualifying criteria are met.

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.

A 60-Day Federal Register Notice (FRN) for the collection published on Tuesday, February 17, 2026. The 60-Day FRN citation is 91 FR 7386.

Two public comments were received during the 60-Day notice public comment period.

A 30-Day Federal Register Notice for the collection published on Monday, April 27, 2026. The 30-Day FRN citation is 91 FR 22586.

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, 2023 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 the Burden for the entire Collection:

- a. Number of Respondents: 458 Loan Servicers.
Number of Total Annual Responses: 39,774
 - Existing VALERI servicing events: 967
 - New VALERI servicing event - Estimated Failed TPP events: 4,968
 - Estimated New Partial Claim Events (Loan Servicer and Veteran): 33,839

- b. Frequency of Responses: One-Time.
- c. Respondent Burden Estimate: 43,751 hours annually.

(Includes: 35,291 hours for loan servicers and 8,460 hours for veterans)
- d. Estimated Completion Time: 66 minutes. The estimated completion time varies by activity. VALERI servicing events are estimated at 11 minutes per response, while Partial Claim submissions are estimated at 66 minutes per response. Of the 66 minutes, approximately 51 minutes are attributed to the loan servicer time and 15 minutes to the Veteran time.
 - Existing VALERI servicing events, 967: 11 Minutes
 - o (This number includes loss mitigation reporting, claim submissions, and other servicing updates. 11 minutes is standard timeframe for event submission, allowing 10 minutes for loan servicer data preparation and submission, and 1 minute for system interaction.)
 - New VALERI servicing event, 4,968: 11 Minutes
 - o (The volume is estimated at once per loan, as is most likely volume each year, but is not limited. 11 minutes is standard timeframe for event submission, allowing 10 minutes for loan servicer data preparation and submission, and 1 minute for system interaction.)
 - Estimated New Partial Claim Events (Loan Servicer and Veteran), 33,839: 66 Minutes
 - o (The number represents the total projected Partial Claim submissions, which include loan servicer and Veteran interaction; the loan servicers should only submit a request for payment under a Partial Claim once per loan. Includes standard 11 minutes for event submission, as outlined above. 15 minutes to review qualifying criteria and gather data, 15 minutes for document preparation, and 10 minutes for document upload into VALERI. Timeframe includes 15 minutes for the Veteran to execute Partial Claim related documents.)

The respondent population is composed of loan servicers, and their interaction with Veterans when reporting data elements for the VA Partial Claim. VBA used general wage data for “Loan Officers” to estimate the respondents’ costs associated with completing the information collection. The Loan Officer category represents the 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 across loan officers is \$1,654.00. Assuming a forty (40) hour work week, the mean hourly wage is \$41.35.

Due to variability in educational background, employment status, and wage potential of Veteran respondents, VA is unable to apply a single occupational category. Therefore, VA used general wage data for “All Occupations” for the Veteran to estimate the respondents’ costs associated with completing the information collection. According to

the Bureau of Labor and Statistics, the median weekly earnings for full-time wage and salary across all occupations is \$1,306.40. Based on a forty (40) hour work week, this results in a mean hourly wage is \$32.66.

The general wage code 13-2072 for “Loan Officers” was used to cover the loan servicers; and the wage code 00-0000 for All Occupations was used to cover the veterans, which may be found by clicking this link: <https://data.bls.gov/oes/#/industry/000000>, May 2024.

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 \$1,735,586.45 (35,291 servicer burden hours x \$41.35 per hour = \$1,459,282.85 and 8,460 Veteran burden hours x \$32.66 = \$276,303.60).

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/2026/DCB_h.pdf.

The total annual responses reflect transaction-level servicing submitted by participating loan servicers and may exceed the number of unique responses in Item 12a.

Task 1: Routine Reviews (System and Business Rule Validations).

Grade	Step	Burden Time (Minutes)	Fraction of Hour (Minutes/60)	Hourly Rate	Cost Per Response	Total Responses	Total
GS-12	10	10 min	0.166667	\$ 57.25	\$9.541666	725	\$6,917.70
Overhead at 100% Salary							\$6,917.70
<i>Note: GS-12 completes 75% of the time. On occasion GS-13 or GS-14 may be complete.</i>							
Processing / Analyzing Costs							\$6,917.70
Printing and Production Cost							\$ 0
Total Cost to Government							\$6,917.70

Task 2: VA Staff Existing Workload Reviews (Review, Approval, and Certification)

Grade	Step	Burden Time (Minutes)	Fraction of Hour (Minutes/60)	Hourly Rate	Cost Per Response	Total Responses	Total
GS-13	6	15 minutes	0.25	\$68.08	\$17.02	242	\$4,118.84
Overhead at 100% Salary							\$4,118.84
GS-12	6	10 minutes	0.166667	\$57.25	\$9.541666	242	\$2,309.08
Overhead at 100% Salary							\$2,309.08
GS-11	6	5 Minutes	0.083333	\$47.77	\$3.980833	242	\$963.36
Overhead at 100% Salary							\$963.36
Processing / Analyzing Costs							\$7,391.28
Printing and Production Cost							\$ 0.00
Total Cost to Government							\$7,391.28

The chart below reflects the typical grade level of staff responsible for conducting partial claim package approval determinations.

Tasks 3: VA Staff New Partial Claim Workload Reviews (Review, Approval, and Certification).

Grade	Step	Burden Time (Minutes)	Fraction	Hourly Rate	Cost Per Response	Total Responses	Total
GS-13	6	15 minutes	0.25	\$ 68.08	\$17.02	33,839	\$575,939.78
Overhead at 100% Salary							\$575,939.78
GS-12	6	10 minutes	0.166667	\$ 57.25	\$9.541666	33,839	\$322,880.45
Overhead at 100% Salary							\$322,880.45
GS-11	6	5 Minutes	0.083333	\$47.77	\$3.980833	33,839	\$134,707.41
Overhead at 100% Salary							\$134,707.41
Processing / Analyzing Costs							\$1,033,527.64
Printing and Production Cost							\$ 0.00
Total Cost to Government							\$1,033,527.64

Total Cost to the Government:

\$6,917.70+ \$7,391.28+ \$1,033,527.64 = **\$1,047,836**

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

The burden hours increased since the last submission due to the addition of new Partial Claim bulk upload template data elements and reportable items, partially offset by removal of responses under VA's VASP and COVID-19-related data elements, which included Refund Modifications.

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 not to 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.