SUPPORTING STATEMENT
Native American Direct Loan (NADL) Processing Requirements
OMB 2900-0926

Summary of Changes from the Previous Approved Collection

- For the Native American Direct Loan (NADL) Processing Requirements there have been no changes in the information collection forms, respondent count, or burden data.
- No public comments were received during the 60-Day notice comment period.

A. <u>Justification</u>

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

This information collection package seeks OMB approval for information collection requirements currently found in VA regulations that support Native American Veterans in obtaining the VA home loan benefit to purchase, construct, or improve dwellings on trust lands, or to refinance their existing Native American Direct Loans (NADL) to a lower interest rate. VA's authority to administer the NADL program is provided under 38 U.S.C. §§ 3701, 3710, 3729, 3761-3765, and 38 CFR § 36.452 and implementation through 38 CFR §§ 36.4501, 36-4512, 36-4527 and 36-4340. The information requested by VA is vital to the NADL program's process and allows VA to determine program eligibility by gathering evidence of Native American Veteran borrowers' tribal membership status and ownership interest in the land on which the dwelling, or proposed dwelling, is or will be situated. The information also allows VA to make prudent credit underwriting decisions by gathering Veteran borrowers' financial information, such as, income, assets, and liabilities 'to determine property acceptability and value; to close the loan under proper authority; and to determine property value, and to oversee the construction process on new-builds and improvement projects.

Without this information, VA would be unable to determine if a Native American Veteran borrower and his/her property are eligible for the VA NADL program, pursuant to 38 U.S.C. §§ 3701, 3702, 3710, 3729, and 3762, if the Veteran borrower meets the credit underwriting standards of 38 CFR § 36.4340, pursuant to 38 U.S.C. § 3762(d)(1), if the subject dwelling meets VA's minimum property requirements, pursuant to 38 U.S.C. § 3710(b)(4), and if the value of the property matches or exceeds the loan amount, per 38 U.S.C. § 3710(b)(7)(c).

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 NADL Coordinators gather documentation from Veteran borrowers to verify program qualifications and to underwrite the loan. Documentation is also requested from and provided by tribal authorities to establish a legal relationship between the tribe and VA, and from building contractors, appraisers, and compliance inspectors to facilitate the construction and valuation processes. The documents may include the Request for Certificate of Eligibility, VA Form 26-1880 (OMB 2900-0086); Request for Determination of Loan Guaranty Eligibility – Unmarried Surviving Spouses, VA Form 26-1817 (OMB 2900-0055); Uniform Residential Loan Application, FNMA-1003; Report and Certification of Loan Disbursement, VA Form 26-1820 (OMB 2900-0521); Request for Verification of Employment, VA Form 26-8497 (OMB 2900-0521); and Request for Verification of Deposit, VA Form 26-8497a (OMB 2900-0521); Loan Analysis VA Form 26-6393 (OMB 2900-0523); executed Memorandum of Understanding; title status report, or other evidence of meaningful interest (e.g., allotment or deed); archeological survey and exhibits; proof of income and assets; credit documentation; evidence of tribal membership; closing disclosure; loan estimate; security instrument; and, if applicable, Interest Rate Reduction Refinancing Loan (IRRRL) Worksheet, VA Form 26-8923 (OMB 2900-0386); IRRRL recoupment calculation; Compliance Inspection Report, VA Form 26-1839 (OMB 2900-0041); Description of Materials, VA Form 26-1852 (OMB 2900-0788); construction lien waiver; and construction contract with exhibits.

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.

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. The use of technology is sometimes limited by internet availability in parts of the world where Native American Veterans reside or by a Veteran’s ability to utilize available technology.

VA Loan Guaranty is currently looking into obtaining software to allow Veterans to apply and submit applications for their home loan benefit online and to allow Veterans, building contractors, appraisers, compliance inspectors, and certain tribal authorities to sign documents electronically to reduce the burden of having to print and scan or mail documents received via email.

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.

The information collected does not have a significant economic impact on a substantial number of small entities. The collection is typical across the mortgage industry and would not create an undue burden to small business.

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 process. This collection is necessary to determine if the applicant is eligible and qualifies for the VA NADL and to close the loan.

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 applicants and third parties to provide information one time per loan application unless certain documents age out prior to loan closing. Documents such as asset information, income documentation, credit documentation, and title status reports may need to be updated by the applicant as part of the loan application process. Additionally, compliance inspection reports and construction lien waivers are submitted by compliance inspectors and building contractors, respectively, following the completion of each prescribed phase of construction. 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 Tuesday, March 24, 2026. The 60-Day FRN citation is 91 FR 14071.

No public comments were received during the 60-Day notice comment period.

A 30-Day Federal Register Notice for the collection published on Wednesday, June 24, 2026. The 30-Day FRN citation is 91 FRN 38081.

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.

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 published 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.

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

The total number of responses, frequency of responses, annual hour burden, completion time and explanation for each collection instrument reported:

a. Total Annual Number of responses: **737**
b. Frequency of Responses: **One-Time**
c. Total Annual Time Burden: **1,721 hours**
d. Estimated Completion Time: **28.04 Minutes per response**. This is the weighted average completion time across all responses.

Description of Information Collection	No. of responses	No. of Respondents	No. of Minutes per response	Burden Hours	Collector Occupation	Hourly Cost	Total Annual Cost
Approved Loans (Commitments Issued)							
Purchase and Construction Loan Applications							
VA Form 26-1880	1	55	0.25 (15 min)	14 (825 min)	Veteran Borrower	$32.66	$457.24
VA Form 26-1817	1	10	0.17 (10 min)	2 (102 min)	Surviving Spouse	$32.66	$65.32
FNMA-1003 (URLA)	1	65	0.5 (30 Min)	33 (1,950 min)	Veteran Borrower	$32.66	$1,077.78
Memorandum of Understanding	1	1	80 (4,800 min)	80 (4,800 min)	Tribal Authorities	$87.86	$7,028.80
Title Status Report	1[*]	40	2 (120 min)	80 (4,800 min)	BIA[2]	$28.65	$2,292.00
Deed or Leasehold Agreement	1	40	3.5 (210 min)	140 (6,000 min)	Tribal Authorities	$87.86	$12,300.40
Deed or Leasehold Agreement	1	40	1 (60 min)	40 (2,400 min)	BIA	$28.65	$1,146.00
DHHL[3] Certificate of Eligibility	1	15	0.5 (30 Min)	8 (450 min)	DHHL	$38.74	$309.92
DHHL Consent to Mortgage	1	15	1 (60 min)	15 (900 min)	DHHL	$38.74	$581.10
Proof of Income and Assets	1[*]	40	1 (60 min)	40 (2,400 min)	Veteran Borrower	$32.66	$1,306.40
Evidence of Tribal Membership	1	40	0.08 (4.8 min)	3 (192 min)	Veteran Borrower	$32.66	97.98
Homeowners Insurance	1	40	0.5 (30 min)	20 (1,200 min)	Veteran Borrower	$32.66	$653.20
Construction Loan Application (includes all of the above)							
Construction Contract with Exhibits[4]	1	5	80 (4,800 min)	400 (24,000 min)	Building Contractor	$40.62	$16,248
Construction Lien Waiver	1	20	0.02 (1.2 min)	0 (0)	Building Contractor	$40.62	$0[5]
Appraisals							
Appraisal Report	1	40	15 (900 min)	600 (36,000 min)	Property Appraiser	$37.10	$22,260
Compliance Inspections							
VA Form 26-1839	1	20	3.25 (195 min)	65 (3,900 min)	Compliance Inspector	$36.75	$2,388.75

May include VA Form 26-1852, *Description of Materials*

[2] Bureau of Indian Affairs

[3] Department of Hawaiian Homelands

[4] May include VA Form 26-1852, *Description of Materials*

[5] Small, calculated burden hours and associated cost may appear as zero due to rounding in the OMB ROCIS system.

Total		**486**		**1,540**			**68,212.89**

Description of Information Collection	No. of Response	No. of Respondents	No. of Minutes per response	Burden Hours	Collector Occupation	Hourly Cost	Total Annual Cost
Denied / Incomplete Loan Applications							
Purchase and Construction Loan Applications							
VA Form 26-1880	1	50	0.25 (15 min)	13 (750 min)	Veteran Borrower	$32.66	$424.58
VA Form 26-1817	1	50	0.17 (10.2 min)	9 (510 min)	Surviving Spouse	$32.66	$293.94
FNMA-1003 (URLA)	1	50	0.5 (30 min)	25 (1,500 min)	Veteran Borrower	$32.66	$816.50
Memorandum of Understanding	1	1	80 (4,800 min)	80 (4,800 min)	Tribal Authorities	$87.86	$7,028.80
Proof of Income and Assets	1*	50	1 (60 min)	50 (3,000 min)	Veteran Borrower	$32.66	$1,633.00
Evidence of Tribal Membership	1	50	0.08 (4.8 min)	4 (240 min)	Veteran Borrower	$32.66	$130.64
Total		**251**		**181**			**$10,327.46**

*These documents may age out and need to be updated one or more times prior to loan closing.

e. The Estimated costs to applicants and third parties are accessible at this link: https://data.bls.gov/oes/#/industry/000000 (September 2024). The respondent population is composed of Native American Veterans and/or their spouses, tribal authorities, building contractors, appraisers, and compliance inspectors. The burden to Veteran borrowers depends on the time it takes to generate and gather documentation to demonstrate program qualification and cannot be ascribed to a specific occupation due to the diverse nature of the population of applicants.

- **Veteran and/or their spouses -** Estimated average wage $32.66 per hour (SOC Code 00-0000 All Occupation).
- **Tribal Authorities' Lead Attorney** - Estimated average wage $87.86 per hour related (SOC Code 23-1011 Lawyers title).
- **Housing Council Chairperson** - Estimated average wage $41.39 per hour (SOC Code 11-9151 Social/Community service program).
- **Compliance Inspectors** - Estimated average wage $36.75 per hour (SOC Code 47-4011, Construction and Building Inspectors).

- **Property Appraisers** - Estimated average wage $37.10 per hour (SOC Code 13-2020, Appraisers and Assessors of Real Estate).
- **Building Contractors** - Estimated average wage $40.62 per hour for first line supervisors of construction trades (SOC Code 47-1011, First-Line Supervisors of Construction Trades and Extraction Worker).
- **DHHL mortgage employees** - Estimated average wage $41.35 per hour for loan officers (SOC Code 13-2072, Loan Officers).
- **BIA** - Estimated average $28.65 per hour for title examiners, abstractors, and searchers (SOC Code 23-2093 Title Examiners, Abstractors, and Searchers).

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 annualized cost estimates for the Federal Government are based on the processing time estimates are listed under item 12 and are based on the actual amount of time employees of the identified grade levels spend processing applications for NADL purchase or construction loans and IRRRLs.

Approved Loans (Commitments Issued)

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 26-1820	1	40	0.21 (12.6 min)	8.4 (504 min)	GS-12, Step 5	$55.62	$467.20
VA Form 26-8497	1	40	0.21 (12.6 min)	8.4 (504 min)	GS-12, Step 5	$55.62	$467.20
VA Form 26-8497a	1	40	0.21 (12.6 min)	8.4 (504 min)	GS-12, Step 5	$55.62	$467.20
VA Form 26-6393	1	40	1 (60 min)	40 (2,400 min)	GS-12, Step 5	$55.62	$2,224.80

[1] May include VA Form 26-1852, *Description of Materials*

Memorandum of Understanding	1	1	40.0 (2,400 min)	40 (2,400 min)	GS-13, Step 5	$66.14	$2,645.60
Credit Documentation	1*	40	1 (60 min)	40 (2,400)	GS-12, Step 5	$55.62	$2,224.80
Closing Disclosure	1	40	1 (60 min)	40 (2,400)	GS-12, Step 5	$55.62	$2,224.80
Loan Estimate	1	40	1 (60 min)	40 (2,400)	GS-12, Step 5	$55.62	$2,224.80
Security Instrument	1	40	1 (60 min)	40 (2,400)	GS-12, Step 5	$55.62	$2,224.80
Notice of Value	1	40	1 (60 min)	40 (2,400)	GS-12, Step 5	$55.62	$2,224.80
Interest Rate Reduction Refinancing Loan Applications							
VA Form 26-8923	1	25	0.24 (14.4 min.)	6 (360 min)	GS-12, Step 5	$55.62	$333.72
Document Reviews							
Memorandum of Understanding	1	1	60 (3,600 min)	60 (3,600 min)	GS-14, Step 5	$78.14	$4,688.40
Memorandum of Understanding	1	1	60 (3,600 min)	60 (3,600 min)	GS-15, Step 5	$91.93	$5,515.80
Memorandum of Understanding	1	1	60 (3,600 min)	60 (3,600 min)	SES, Level IV	$94.49	$5,669.40
Construction Contract with Exhibits[1]	1	5	2 (120 min)	10 (600 min)	GS-12, Step 5	$55.62	$556.20
Loan Package	1	40	2 (120 min)	80 (4,800)	GS-13, Step 5	$66.14	$5,291.20
Loan Package	1	40	2 (120 min)	80 (4,800)	GS-14, Step 5	$78.14	$6,251.20
Loan Package	1	40	2 (120 min)	80 (4,800)	GS-15, Step 5	$91.93	$7,354.40
Loan Package	1	40	2 (120 min)	80 (4,800)	SES, Level IV	$94.49	$7,559.20
Overhead at 100% Salary							$60,615.52
Printing and Production Cost						N/A	$7.88
Total Annual Cost to Government (Approved Loans)							**$60,623.40**

Denied / Incomplete Loan Applications

Description of Information Collection	**Frequency of Responses**	**Total Annual Responses**	**Hours per Response**	**Annual Burden Hours**	**Employ ee Grade Level**	**Employee Hourly Wage**	**Total Annual Cost**
Purchase and Construction Loan Applications							
VA Form 26-6393	1	50	1 (60 min)	50 (3,000)	GS-12, Step 5	$55.62	$2,781.00
Memorandum of Understanding	1	1	50 (3,000 min)	50 (3,000 min)	GS-13, Step 5	66.14	$3,307.00

Credit Documentation	1[*]	50	1 (60 min)	50 (3,000)	GS-12, Step 5	55.62	$2,781.00
Higher Level Reviews							
Memorandum of Understanding	1	1	70 (4,200 min)	70 (4,200 min)	GS-14, Step 5	78.14	$5,469.80
Memorandum of Understanding	1	1	80 (4,800 min)	80 (4,800 min)	GS-15, Step 5	$91.93	$7,354.40
Memorandum of Understanding	1	1	80 (4,800 min)	80 (4,800 min)	SES, Level IV	94.49	$7,559.20
Loan Package	1	50	4 (240 min)	200 (12,000)	GS-13, Step 5	$66.14	$13,228.00
Overhead at 100% Salary							$42,480.40
Printing and Production Cost						N/A	$31.54
Total Annual Cost to Government (Denied / Incomplete Applications)							$42,511.94
Total Annual Cost to Government (Combined Approved and Denied)							**$42,511.94**

The estimated total annual cost to the Federal Government is $103,135.34. This amount includes 60,623.40 for processing approval loan applications and $42,511.94 for processing denied or incomplete loan applications.

The salaries used to calculate the estimated costs to the Federal Government are accessible through these links: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/DCB_h.pdf.

The estimated printing cost is $0.0649 per page, or a total of $21.42 per year, based on approved franchise fund rates and printing an average of fifteen 22-page packages to be mailed per year.

The estimated mail cost is $1.20 each, for a total of $18 per year, based on UPSP postage rates for first class mail, flat / large envelope (1 oz.) and mailing an average of fifteen NADL application packages per year.

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

There have been no burden hour changes since the last submission.

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.