

Date: November 01, 2016

To: Stephanie Tatham, OMB Desk Officer  
Office of Information and Regulatory Affairs  
Office of Management and Budget

Through: Cynthia Harvey-Pryor, Acting VA Clearance Officer  
Office of Privacy and Records Management  
Office of Information Technology (005R1B)

From: Brian Lilley, Management Analyst  
Loan Guaranty Service (26)  
Veterans Benefits Administration,  
Department of Veterans Affairs

Subj: Request for Emergency Extension (EE) of OMB Control Number

1. The collection of information:

VA is submitting a request for an "Emergency Extension" of OMB control number 2900-0111, the Statement of Purchaser or Owner Assuming Seller's Loan.

This form is completed by purchasers who are assuming veterans' guaranteed, insured, and direct home loans. The data furnished on the form is essential to determinations for release of liability and substitution of entitlement in accordance with 38 U.S.C. 3713(a) (release of liability) and 3702(b)(2) (substitution of entitlement). The majority of releases of liability cases are now processed by servicers, rather than the Department of Veterans Affairs (VA).

**I. Data collection is needed prior to the expiration of time periods established in this Part; and**

The emergency extension of this collection of information is needed before the expiration date of November 30, 2016, in order to complete the standard 60 and 30-day Federal Register Notice and public comment periods established under the Paperwork Reduction Act (150 days total) including OMB review.

**II. Data collection is essential to the mission of the agency**

The information collected on VA Form 26-6382 is essential for VA to make determinations for release of liability as well as for credit underwriting determinations for substitution of entitlement cases, as required. VA Form 26-6382 is available on the One-VA website in a fillable electronic format. VBA is currently hosting this form on a secure server. The majority of form usage is done by lenders, and cases processed by VA are done on a very limited basis.

**2. The agency cannot reasonably comply with the normal clearance procedures under this Part because:**

- I. The unanticipated departure of VA's Clearance Officer and agency transition led to an oversight of the status of the data collection. A Non-Substantive Change Request was approved in April 2016, but did not extend the expiration date. The program office was alerted to initiate the renewal process by the acting Clearance Officer. However, the time frame was not conducive to complete the full 60 and 30-day public comment cycle and OMB review. VA has withheld publication of the 60-day FRN to consult with the OMB Desk Officer in regard to extending the expiration date. VA is requesting an additional 90 days for an OMB control number extension until February 28, 2017, to complete the FR 60 and 30-day comment period and OMB review.
- II. The use of normal clearance procedures is reasonably likely to disrupt the collection of information. The data collections OMB approved clearance would expire in less than 30 days. Therefore, VA would not be responsive to the needs of its customers if information were collected less frequently or not in an efficient manner.

**(a) Requested time period within which OMB should approve or disapprove the collection of information.**

VA is requesting to extend the data collection expiration date to February 28, 2017. If granted an emergency extension, VA will immediately and appropriately submit a 60-day Federal Register Notice for public comment.

Please contact Acting VA Clearance Officer, Cynthia Harvey-Pryor, with any questions at 202-461-5870 or email at [Cynthia.harvey-pryor@va.gov](mailto:Cynthia.harvey-pryor@va.gov).

Sincerely,

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