

SUPPORTING STATEMENT FOR VA FORM 26-8736a
NONSUPERVISED LENDER'S NOMINATION AND RECOMMENDATION OF
CREDIT UNDERWRITER
(2900-0253)

A. JUSTIFICATION

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

Title 38, U.S. Code, Section 3702(d), provides for lenders to make automatic guaranteed loans if approved for such purpose and if the loans are made pursuant to the standards established by the Secretary of Veterans Affairs. The standards, 8 C.F.R. 36.4352(b)(2), require that a lender have a qualified underwriter review all loans to be closed on an automatic basis to determine that the loan meets VA's credit underwriting standards. To determine if the lender's nominee is qualified to make such a determination, VA has developed VA Form 26-8736a which contains information that VA considers crucial to the evaluation of the underwriter's experience. This form will be completed by the lender and the lender's nominee for underwriter and then submitted to VA for approval.

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 26-8736a will be submitted to VA by a non-supervised lender with the initial application for authority to close loans on the automatic basis or in connection with nominations of additional or new credit underwriters subsequent to approval. VA field personnel will review the form and notify the lender as to whether their nominee for underwriter is approved or disapproved.

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 Form 26-8736a is available on the One-VA website in a fillable electronic format. VBA is currently hosting this form on a secure server. An electronic submission system is not advantageous to the government as the number of estimated respondents does not justify the cost of creating and maintaining such a system.

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.

No duplication of information is involved. We know of no central data bank containing personal information on an individual's credit underwriting qualifications which would be updated routinely to reflect accumulated experience.

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

Small organizations are involved and to help minimize their burden, VA developed VA Form 26-8736a. The use of this form enables underwriters to summarize their relevant VA experience.

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.

Collection of data occurs generally only once per respondent at the time a non-supervised lender applies for authority to close loans on the automatic basis or for new or additional underwriters subsequent to approval.

7. There 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 C.F.R. 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 C.F.R. 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.

The Department notice was published in the Federal Register at Vol. 85, No. 14 on January 22, 2020 at page 3762. There were no comments in response to this notice.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Decisions to provide any payment or gift to respondents does not apply.

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.

VA will not disclose information collected on this form to any source other than what has been authorized under the Privacy Act of 1974 or Title 38, Code of Federal Regulations 1.576 for routine uses identified in the VA system of records, 55VA26, Loan Guaranty Home, Condominium and Manufactured Home Loan Applicant Records, Specially Adapted Housing Applicant Records, and Vendee Loan Applicants Records – VA, and published in the Federal Register.

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:

Estimate of Information Collection Burden

- a. Number of respondents is estimated at 1500 per year.
- b. Frequency of response is generally one time.
- c. Annual burden is 500 hours.
- d. The estimated burden of 20 minutes per transaction has been determined by lenders to be an average time spent to report the information requested and no wide variance is likely.
- e. The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the median weekly earnings of full-time wage and salary workers are \$1,466.80. Assuming a forty (40) hour work week, the mean hourly wage is \$36.67 based on the BLS wage code – “13-2072 Loan Officers. This information was taken from the following website: (<https://www.bls.gov/oes/current/oes132072.htm>, May 2018).

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 the Federal government an estimated \$18,335 (500 hours x \$36.67 per hour).

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers 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. Estimated Annualized Cost to the Federal Government

There are no printing costs. VA Form 26-8736a can be downloaded from the VA website.

Grade	Step	Burden Time	Fraction of Hour	Hourly Rate	Cost Per Response	Total Responses	Total
11	6	500	1.00	\$35.78	\$35.78	120,000	\$ 17,890.00
Overhead at 100% Salary							\$ 17,890.00

12	6	250	0.50	\$42.89	\$21.45	120,000	\$ 5,362.50
Overhead at 100% Salary							\$ 5,362.50
13	6	125	0.25	\$51.00	\$12.75	120,000	\$ 1,593.75
Overhead at 100% Salary							\$ 1,593.75
Processing / Analyzing Costs							\$ 24,846.25
Printing and Production Cost							\$ 0.00
Total Cost to Government							\$ 24,846.50

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

There are no changes in burden 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.

Information collection is not for tabulation or publication use.

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. Request to continue with an extension of an already approved collection for 3 years from the date of expiration.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.

There is no exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

1. The Veterans Benefits Administration does not collect information employing statistical methods.