
19. Certification for Paperwork Reduction Act Submissions

On behalf of the U.S. Department of Housing and Urban Development, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9.

Note: The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320/8(b)(3) appears at the end of the instructions. The certification is to be made with reference to those regulatory provisions as set forth in the instructions.

The following is a summary of the topics, regarding the proposed collections of information that the certification covers:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities;
- (d) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) It indicates the retention periods for recordkeeping requirements;
- (g) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
 - (i) Why the information is being collected;
 - (ii) Use of the information;
 - (iii) Burden estimate;
 - (iv) Nature of response (voluntary, required for a benefit, or mandatory);
 - (v) Nature and extent of confidentiality; and
 - (vi) Need to display currently valid OMB control number;
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to collected (see note in item 19 of the instructions);
- (i) It uses effective and efficient statistical survey methodology; and
- (j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in item 18 of the Supporting Statement.

Signature of Program Official: X Mike Winiarski, Director, Organizational Policy, Planning and Analysis Division, HROA	Date:
Signature of Senior Officer or Designee: X Lillian Deitzer, Departmental Reports Management Officer	Date:

Supporting Statement for Paperwork Reduction Act Submissions

Master Appraisal Reports

OMB Control Number 2502-0493

(HUD-91322, HUD-91322.1, HUD-91322.2, & HUD-91322.3)

A. Justification

1. Section 203 of the National Housing Act (P.L. 479, 48 Stat. 1246, 12 U.S.C. 1709 et seq.) authorizes the Secretary of the Department of Housing and Urban Development (HUD) to insure mortgages on applications by approved mortgagees for appraisal and Commitment/Direct Endorsement Statement of Appraised Value on designated properties. The Master Appraisal Reports and related forms involve only “proposed” construction.
2. The Master Appraisal Report (MAR), form HUD-91322, permits the listing of models, which includes the base value that cover the different types of individual homes proposed for construction. The MAR also sets forth the general and specific conditions that must be addressed before HUD/FHA can endorse a firm commitment for mortgage insurance. Respondents are participating lenders and developers. After a thorough research of the program, it has been noted that the number of MARS being requested have significantly decreased. Additionally, the forms did not accurately reflect the number of respondents, therefore, the number of respondents and the annual burden hours have also significantly decreased.

The Master Appraisal Report (MAR), Attachment Number 1, form HUD-91322.1 includes the list options to the base value that cover the different types of individual homes proposed for construction.

The Master Appraisal Report (MAR) Amendment, form HUD-91322.2 identifies any changes to the original MAR form HUD-91322 value that cover the different types of individual homes proposed for construction.

HUD 91322 (MAR) is a streamlined reporting process. The information collected on form HUD-91322.1 and HUD-91322.2 is not required or information is not known until after the initial form HUD-91322 is submitted. Rather than restart the process forms 91322.1 and 91322.2 are used. Mortgagees submit these forms to HUD for endorsement purposes; the borrower does not receive this information.

“The Statement of Appraised Value for a Mortgage to be Insured Under the National Housing Act,” form HUD-91322.3 information is required by law. It is a “Statement of Appraised Value” that borrowers, who will be receiving HUD/FHA-insured mortgages, must receive prior to the purchase of the property.

3. The Master Appraisal Reports (MARS), form HUD-91322 series, are available online at HUD’s Client Information and Policy System world wide web address, <http://www.hudclips.org> in PDF fillable file formats. Mortgagees may use an internal automation process, however the documents are submitted to HUD on paper. A mortgagee is required to submit copies of the requisite forms to apply for a series of case number assignments. HUD assigns the case numbers and upon appraisal confirmation the case numbers are activated online to HUD’s FHA Connection electronically through the Computerized Homes Underwriting Management System (CHUMS).
4. A review of other collections did not identify any duplication with other forms or processes. The completed MAR eliminates the need to report on an individual property and permits the reporting for several individual properties within a specific subdivision. A single MAR permits five models per form, but extra models can be added on a separate blank MAR sheet.
5. There is no significant impact on small businesses or other small entities.

6. If this activity is not conducted, mortgagees will have to report on an individual basis all properties seeking FHA mortgage insurance in a specific subdivision despite the similarity in construction type and cost. Without this information collection, time and costs will increase substantially for FHA, proposed borrowers, and mortgagees.
7. There are no special circumstances in the collection of this information.
8. In accordance with 5 CFR Part 1320.8(d), the agency's notice for public comments was announced in the Federal Register on **October 2, 2008** (Vol. 73, No. 192, pages 57379 and 57380). No comments were received.

In September 2008, HUD Headquarters staff consulted directly with all four Homeownership Center (HOC) Processing and Underwriting Director on the number of each HOC Master Appraisal Reports that were completed in the last three years and the respondents are 70.

9. Respondents are not provided payments or gifts for this information collection.
10. No assurance of confidentiality is provided.
11. This information collection does not contain questions of a sensitive nature.
12. Estimates of burden and annualized costs to respondents:

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
HUD-93122	70	1	70	.50	35	\$25.00	\$875
HUD-93122.1	70	1	70	.50	35	\$25.00	\$875
HUD-93122.2	70	1	70	.50	35	\$25.00	\$875
HUD-93122.3	3,500	1	3,500	.20	700	\$25.00	\$17,500
Totals	3,710		3,710		805		\$20,125

The hourly rate is based on an estimate of lenders' staff at the rate of \$52,000 annually.

The 70 respondents are the total number of lenders applying for a Master Appraisal Report approval and the 3,500, is the total number of respondents to HUD form 91322.3 the statement of Appraised Value for each combine units sold under the Master Appraisal Report process.

13. There are no additional costs to the respondents.
14. The annual cost to the Federal Government is estimated as follows:
 $70 \text{ responses} \times .50 \text{ hour per response} = 35 \text{ hours} \times 1 \text{ responses} \times \$33.00 = \$875$
 (Hourly cost is for a GS-12 employee).
15. This is an extension of a currently approved collection. The number of responses shows a decrease because of a drop in the number of MARS request by lenders over the years.
16. The results of this information collection are not published.
17. HUD is not seeking approval to avoid displaying the OMB expiration date.
18. There are no exceptions to the certification statement identified in item 19 of the OMB 83-I.

B. Collections of Information Employing Statistical Methods

This information collection does not employ statistical methods.