

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification

1. Circumstances that make the collection of information necessary.

Department of Housing and Urban Development (HUD) has developed a loan processing procedure called Multifamily Accelerated Processing (MAP) under which they allow Federal Housing Administration (FHA) approved Lenders to prepare loan applications, process the collected data and submit loan applications for FHA multifamily mortgage insurance, subject to review by HUD staff. This procedure applies to loan programs processed under Section 220, Sections 221(d)(3) and (4), Section 223(f), Section 231 of the National Housing Act and future National Housing Act programs Section 223(a)(7) and Section 241(a).

In addition to being an FHA-approved multifamily mortgagee, a Lender must meet additional qualifications if it wishes to participate in MAP. There is no requirement that a Lender participate in MAP because the traditional method of processing is still available, but most Lenders prefer to use MAP because it substantially shortens the HUD processing time. Since HUD wants to ensure that only experienced multifamily Lenders be given the responsibilities for processing under MAP this collection of information will also make it necessary for the Department to determine whether the applicants have the necessary qualifications and experience to handle the additional duties and responsibilities of a MAP Lender. The submission of the information is required for all applicants who wish to be MAP approved.

The collection of information set forth in Chapter 2 of the Multifamily Accelerated Processing Guide, which covers the MAP Lender approval requirements and the requirement for submission of a Quality Control Plan, is necessary in order to determine which Lenders are qualified to use this form of national accelerated processing.

Lastly, several HUD Forms are referenced throughout the MAP Guide. This collection uses the following Forms that are covered under other information collections listed below for the application process for FHA multifamily mortgage insurance. These Forms used in the application process includes gathering, retention, recordkeeping, and reporting. The Department continues to work on instruments for the MAP Guide under other collections. Listed below are those Forms and their OMB Approval numbers:

OMB Approval No. 2502-0001 - Form HUD 92417

OMB Approval No. 2502-0005 - Form HUD 92001B

OMB Approval No. 2502-0009 - HUD 11

OMB Approval No. 2502-0010 - Form HUD 92457

OMB Approval No. 2502-0011 - Form HUD 92437; HUD 92441; HUD 92442; HUD 92442A; HUD 2880

OMB Approval No. 2502-0013 - Forms HUD 935.2A

OMB Approval No. 2502-0016 - Form HUD 92023

OMB Approval No. 2502-0018 - HUD 92464

OMB Approval No. 2502-0028 - Form HUD 92448

OMB Approval No. 2502-0029 - Forms HUD 2010; HUD-92013; HUD 92013 Supp; HUD 92264; HUD 92264T; HUD 92264A; HUD 92273; HUD 92274; HUD 92326; HUD 92329; HUD 92331; HUD

92415; HUD 92447; HUD 92452; HUD 92485; HUD 2880; HUD 92466; HUD 92466R-1; HUD 92466 R-2; HUD 92466 R-3.

OMB Approval No. 2502-0044 - Form FHA 2205A; HUD 2328; HUD 92330A

OMB Approval No. 2502-0057 - HUD 3433; HUD 3434; HUD 3435

OMB Approval No. 2502-0097 - Form HUD 92403

OMB Approval No. 2502-0112 - Form HUD 92330

OMB Approval No. 2502-0118 - Form HUD 2530

OMB Approval No. 2502-0210 - HUD 2576HF;

OMB Approval No. 2502-0305 - HUD 9832; HUD 9839B; HUD 9839C

OMB Approval No. 2502-0468 - FHA 3259

OMB Approval No. 2502-0470 - HUD 2554; HUD 92476A

OMB Approval No. 2502-0541 - Chapter 2 of the Guide - MAP Lender Approval

Mortgagee Letter 2009-27 - Chapter 9 of the Guide - Environmental Requirements

2. By who, and for what purpose is the information to be used?

This MAP Guide outlines the basic instructions, requirements, and processing procedures for a multifamily rental loan application from the pre-application phase of processing through firm commitment issuance, construction, cost certification and final endorsement where applicable for the approved MAP Lender a review by the Department. The MAP Lender assumes the responsibility of underwriting the loan to include the preparation of narrative reports, gathering of data, collection of information, the review of reports and data prepared by licensed professionals (Appraisers, Architects, Cost Analysts, Underwriters, etc.), and the completion of applicable HUD Forms. The completed package is then submitted to the local HUD multifamily housing office for review by the Department for the possible issuance of a Firm Commitment.

3. Use of technical collection techniques to reduce burden.

All Forms (with OMB Clearance numbers) are available on Department's website. In the past the Office of Multifamily Housing Development (MHD) did not receive these forms electronically for submission of a complete application package for mortgage insurance. Some of the forms are in the pdf format, pdf fillable or can be scanned and sent by electronic mail. This collection of information does not involve the use of an automated system for the preparation and submission of complete application packages for mortgage insurance. The Department and MHD are undergoing a transformation of the IT infrastructure which will dictate the type of automated systems to be developed. The Office of MHD has communicated that it is imperative that the automated system developed adequately address concerns for confidentiality (due to the nature of data reported) and the need and ability to capture electronic-signatures. Until the IT transformation has time to materialize, MHD has established a viable electronic intake process that is sustainable through the receipt of complete application packages by a disc or removeable drive.

4. Identify duplication.

Development and construction cost varies with each project. General or modified information is not acceptable. No other forms exists which can be acceptable. No other existing forms can be substituted to obtain the required information for mortgage proceeds.

5. Impact of small organizations.

The Department minimizes the burden on small businesses by requiring the collection of information only once at or before Initial Endorsement.

6. Consequences of less frequent collection.

The collection of information occurs only once for each loan for mortgage insurance for multifamily housing project and MAP approval of a Lender. The Department could not comply with the provisions of the law and Federal Regulations if the collection was eliminated.

7. Special circumstances.

There are no special circumstances that apply to this information collection.

8. Federal Register /

In accordance with 5 CFR 1320.8(d) this collection was announced in the Federal Register on October 8, 2010, Vol. 75, No. 195, page 62410-11. Additionally, a 30 day federal register notice was published on December 22, 2010.

The following individual mortgage companies provided comments regarding the information collection. All individuals indicated that the information collection is still necessary to conduct business.

AmeriSphere Mortgage Finance, LLC
1125 South 103rd Street, Suite 130
Omaha, NE 68124
Rodrigo Lopez – (402) 498-9184

Bisbee Baldwin Mortgage Company
P.O. Box 1050
341 West Forsyth Street
Jacksonville, FL 32201
Ron Langley – (904) 353-6411

Capmark Finance Inc.
12444 Powerscourt Dr, Suite 400
St. Louis, MO 63131
Donna Switzer - (314) 984-5512

D. Ansley Company, Inc.
70 N.E. Loop 410, Suite 880
San Antonio, TX 78216
Randall H. Mason – (210) 336-3933

9. Payment of gifts.

No gifts or payments, other than remuneration to contractors, are provided to respondents.

10. Confidentiality.

The Privacy Act of 1974 provides an assurance of confidentiality to the respondents.

11. Sensitive questions.

No questions of a sensitive nature apply.

12. Estimates of the hour burden and costs for collection of information:

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
PCNA	*90	1	1,045	54	56,430	\$64.00	\$3,611,520
Detailed Work Write-Up	90	1	1,045	100	104,500	\$75.00	\$7,837,500
Firm Commitment Extension Request	90	1	100	1	100	\$35.00	\$3,500
Market Study	90	1	1,045	51	53,295	\$67.00	\$3,570,765
Lenders Narrative Report	90	1	1,045	10	10,450	\$48.00	\$501,600
Standard Practice Forms							
Drawings, Specifications, & Amendment AIA-B180	90	1	696	100	69,600	\$120.00	\$8,352,000
Appraisal	90	1	1,045	120	125,400	\$50.00	\$6,270,000
TOTAL	90		1,045	436	419,775		\$30,146,885

*The number of respondents (90) represents the number of MAP approved Lenders that submit applications for FHA Multifamily insurance.

The above data is reflective of applications received in an annual basis, **1,045**. The hourly rate is an estimate based on an average annual salary of \$71,600.

13. Total annual cost burden to respondents.

There are no additional costs to respondents.

14. Cost to the Federal Government:

Information Collection	Total Annual Responses	Hours per Response	Total Annual Burden Hours	Hourly Cost	Total Annual Cost
PCNA	1,045	10	10,450	\$40	\$418,000
Detailed Work	1,045	44	45,980	\$40	\$1,839,200

Write-Up					
Firm Commitment Extension Request	100	1	100	\$40	\$4,000
Market Study	1,045	40	41,800	\$40	\$1,672,000
Lenders narrative Report	1,045	4	4,180	\$40	\$167,200
Standard Practice Forms					
Drawings & Specifications & AIA-B181	696	56	38,976	\$40.00	\$1,559,040
Appraisal	1,045	56	58,520	\$40.00	\$2,340,800
Total					\$8,000,240

Hourly cost is based on a GS-12/5 Federal salary. The burden hours are substantially reduced as HUD only performs a review of the actual MAP application package and does not gather the actual data.

15. Reasons for any program changes or adjustments.

This is a revision of the currently approved collection for approval of MAP Lender requirements. There are no changes to the way the program is administered. We are adding the FHA multifamily mortgage insurance application process, which accounts for the increase in the responses and burden hours.

16. Collection of information whose results will be published.

Collection of this information will not be published. Each form will be maintained with the HUD Program Office in individual case file.

17. Display of expiration date.

HUD is not seeking approval to avoid displaying the OMB expiration date.

18. Exceptions to Certification Statement.

There are no exceptions to the "Certification Statement" identified in item 19 of Form OMB 83-1.

B. Collection of information employing statistical methods.

There are no plans to use statistical methods for collection of this information.