Supporting Statement for Paperwork Reduction Act Submissions

Office of Healthcare Programs (Office of Residential Care Facilities) Project Application,
Process Review and Asset Management
OMB Control Number 2502-XXXX

A. Justification

- 1. Under Sections 207, 221, 223, 231, and 241 of the National Housing Act (Public Law 479, 48 Stat. 1246, 12 U.S.C. 1701 et seq.), the applicable portions of which are attached for reference, the Secretary of the Department of Housing and Urban Development (HUD) is authorized to implement a system for insuring mortgages. Although the Secretary of HUD will delegate processing to select approved lenders, the Secretary will retain the authority to approve rents, expenses, property appraisals, and mortgage amounts, and to execute a firm commitment.
- 2. The information collected is utilized during the processing of an application for FHA mortgage insurance. For residential healthcare facility projects under the Section 232 program, these submissions are reviewed by the Office of Healthcare Program's (OHP) Office of Residential Care Facilities (ORCF). The respondents are borrowers/sponsors, general contractors, lenders, and others involved in residential healthcare facility projects. Mortgagors submit to ORCF, via an approved lender, an application for a project to be insured by HUD. The lender's underwriters will process forms and submit them to HUD. The contractors involved may include architects, cost analysts, appraisers, and mortgage credit analysts. An environmental review is also conducted, as well as a market analysis.

This information is provided by sponsors and general contractors of proposed residential healthcare projects and submitted by a HUD-approved mortgagee for application of FHA mortgage insurance. The information is used to determine project feasibility, principals' acceptability, and credit worthiness.

Below is a brief description of the forms submitted in support of this request:

- a. <u>Section 232 Production Applications</u>: The application packages (regardless of whether they are for a refinance of an existing FHA insured mortgage, the refinance or purchase of a facility with a new FHA insured mortgage, substantial rehabilitation or new construction), contain the same basic standardized exhibits and forms. These documents consist of information and certifications that must be examined to meet program requirements and they provide a standardized vehicle for staff to analyze project data and to determine if the project is eligible for FHA mortgage insurance.
- b. <u>Additional Section 232 Production Documents</u>: The other included documents in a Section 232 package are necessary for the application, review, commitment, administration, technical oversight, audit and initial/final endorsement of ORCF projects pursuant to FHA Programs 232, 241, 223(f), 223(a)(7), etc. The information collected is imperative for HUD/FHA/OHP to comply with program regulations under 24 CFR 232,

- 241, 223 (a)(7) and 223(f). Furthermore, the collection of information obtained using the additional documents referenced herein is necessary to ensure accountability of residential healthcare mortgage insurance operations and may be subject to audit by various federal agencies as well as inquiries pursuant to the Freedom of Information Act. Examples of what these additional documents may include are construction related materials, escrow agreements, accounts receivable financing documents or master lease documents.
- c. <u>Section 232 Asset Management Documents</u>: Once an approved project has completed the Section 232 application process, there are additional forms involved with the ongoing asset management. These forms not only monitor the financial and physical health of the facilities, but also allow for modifications of existing agreements and ensure compliance with HUD requirements. Examples of what these additional documents are related include transfers of physical assets; modifications or additions of accounts receivable financing or master leases; and certifications of physical condition, health and safety issues, financial statements and completed repairs.

A complete listing of burden hours (including form numbers, titles and the burden hours) is contained in item 12 of this document. A brief summary of the category types is provided in the chart below:

Types of Documents
FHA Number Request Form
Lender Narratives
Certifications
Construction Documents
Escrow Documents
Additional ORCF Application Documents
Transfer of Physical Assets Documents
Accounts Receivable Documents
Master Lease Documents
Asset Management Documents
Additional Legal Documents

On September 7, 2012, ORCF published a final rule on Strengthening Accountability in the Section 232 Healthcare Facility Insurance Program. This rule was designed to improve the efficiency of and enhance the risk management of the Section 232 program. In particular, the final rule will:

- Allow ORCF to establish a long-term debt service reserve, when necessary (this reserve will be a mortgageable expense)
- Add flexibility with respect to borrower surplus cash requirements
- Require quarterly submission of operator financial reports to lender and HUD
- Require the operator to promptly inform HUD and lender when notified that any permits or approvals are at risk of suspension or loss

• Limit the use of REAC physical inspections for facilities that are closely regulated by the Centers for Medicare and Medicaid Services and the contracting states (primarily Skilled Nursing Facilities and Intermediate Care Facilities)

The improved access to key financial and operational data, coupled with new tools such as a debt service reserve and limitations on operator's ability to withdraw funds, should reduce the risk of a property's decline and better position HUD and the lender to intervene when indicators suggest an insured property's performance is becoming problematic.

3. Currently the collection of information will be accessible via the internet, and forms will be in Microsoft Word or PDF-fillable forms, thus allowing electronic submission.

To facilitate the reduction of burden hours, HUD is evaluating the possibilities for developing system-based technology to collect data. The collection of information does not currently involve the use of automation in such a system; however, HUD and the Office of Housing are undergoing a transformation of the IT infrastructure which will dictate the type of automated systems that will be developed. This process is very detailed and involves the evaluation of each data point received during a loan application process; how that data flows from the intake process through the ORCF review process and then on to a longer term asset management system for ongoing use in monitoring each project. Having these new workflows work in connection with the existing HUD systems requires development, review, testing, and understanding of how the internal and external submissions are feasible within firewall standards used by both HUD and the lending industry. This entire process is something ORCF is interested in and is currently studying and working with HUD IT personnel to develop; however there are significant financial constraints that are also associated with such a large automation process, and this type of overall automation of program and its application review and monitoring process will take a significant amount of time and resources.

Further, it is imperative that the automatic system is developed adequately to address concerns for confidentiality, due to the nature of data reported. Until the IT transformation has been able to establish such security and a platform that will house these new capabilities, it is difficult to establish a viable electronic intake process that will be sustained.

- 4. This information is not collected elsewhere. A review of ORCF information collections confirms that no other information collection provides this particular information.
- This collection of information will not have a significant impact on small business or other small entities. ORCF residential healthcare project borrowers/sponsors are rarely small businesses.
- 6. If the information were not collected, then HUD would have no record of completion to provide to the satisfaction of all parties of the contract and responsible local government officials.

- 7. ORCF requires one electronic copy of each submission, and one hard copy of the documents for file retention. In some cases, such as documents to be reviewed by the Office of General Counsel, which may be located in an office separate from the ORCF Reviewer, additional copies may be requested, as needed. Because of the amount of money involved, other parties also require originals, including the mortgagee, the borrower, the contractor, and the architect.
- 8. In accordance with 5 CFR 1320.8(d), the agency's notice soliciting public comments was announced in the Federal Register on May 3, 2012. After the first 30 days of the public comment period, ORCF also held a public forum to allow the industry stakeholders to publicly provide feedback on the Collection. The public forum was available for attendance in person or via the internet. Comments were recorded and entered into the record, but all substantive comments made during the public forum were also submitted in writing, via the Federal Register website, by those commenters.

Prior to the initial public comment period on this PRA Information Collection, ORCF consulted with three outside lenders in the healthcare industry to discern the level of burden hours associated with the documents in this Information Collection. Each lender responded to the amount of time each form takes to complete, the average number of times each form is submitted annually, and the average salary for the person completing each type of form.

- 9. No payments or gifts of any kind are provided to respondents.
- 10. Mortgage insurance files and financial documentation generally fall under the confidentiality provisions of the Privacy Act and Freedom of Information Act. The Housing and Community Development Act of 1987, 42 U.S.C. 3543, requires persons applying for a federally insured or guaranteed loan to furnish his/her Social Security Number (SSN) or Employer Identification Number (EIN). The inclusion of SSN/EIN is considered a confidential matter. A Privacy Act notice is printed on the appropriate forms. HUD assures confidentiality to respondents on other information collected if it would result in competitive harm in accord with the Freedom of Information Act (FOIA) provisions or if it could impact on the ability of the Department's mission to provide housing units under the various Sections of the Housing Legislation.
- 11. The forms do not include questions of a sensitive nature.

12. Estimated burden hours and costs to the respondents:

		Number			Avg. Burden per		Avg. Hourly	
New Form Number	Form Name	of Respon- dents	Freq. of Resp.	Resp. per Annum	Hour per Resp.	Annual Burden Hours	Cost Per Resp.	Annual Cost
Lender Narratives			<u> </u>					
HUD-9001-ORCF	Lender Narrative 223a7 - Main	30	2.5	75	22.00	1650	\$ 75	\$123,750
HUD-9001a-ORCF	Lender Narrative 223a7 - Addenda - PCNA	30	2.5	75	1.50	112.5	\$75	\$8,438
HUD-9001b-ORCF	Lender Narrative 223a7.223d.232i - Addendum – ALTA/ACSM Land Title Survey	30	2.5	75	0.50	37.5	\$75	\$2,813
HUD-9001c-ORCF	Lender Narrative 223a7 - Addendum - Environmental	30	2.5	75	0.50	37.5	\$75	\$2,813
HUD-9001d-ORCF	Lender Narrative 223a7 - Addendum – Other Existing Eligible Indebtedness	30	2.5	75	0.50	37.5	\$75	\$2,813
HUD-9001e-ORCF	Lender Narrative 223a7.223d.232i - Addendum - Principal of Borrower	30	2.5	75	0.50	37.5	\$75	\$2,813
HUD-9001f-ORCF	Lender Narrative 223a7.223d.232i - Addendum - Operator	20	2.5	50	0.50	25	\$75	\$1,875
HUD-9001g-ORCF	Lender Narrative 223a7.223d.232i - Addendum - Management Agent	12	2.5	30	0.50	15	\$75	\$1,125
HUD-9001h-ORCF	Lender Narrative 223a7.223d.232i - Addendum - Transfer of Physical Assets	30	2.5	75	0.50	37.5	\$75	\$2,813
HUD-9001i-ORCF	Lender Narrative 223a7.223d.232i - Addendum - AR Financing	30	2.5	75	0.50	37.5	\$75	\$2,813
HUD-9002-ORCF	Lender Narrative 223f	30	7.5	225	70.00	15750	\$75	\$1,181,250
HUD-9003-ORCF	Lender Narrative 241a	4	1	4	73.00	292	\$75	\$21,900
HUD-9004-ORCF	Lender Narrative - New Construction - Single Stage	10	2	20	87.00	1740	\$75	\$130,500
HUD-9005-ORCF	Lender Narrative - New Construction - 2 Stage Initial Submittal	10	2	20	63.00	1260	\$75	\$94,500
HUD-9005a-ORCF	Lender Narrative - New Construction - 2 Stage Final Submittal	10	2	20	53.00	1060	\$75	\$79,500
HUD-9006-ORCF	Lender Narrative - Substantial Rehabilitation - Single Stage	4	1	4	93.00	372	\$75	\$27,900
HUD-9007-ORCF	Lender Narrative - Substantial Rehabilitation - 2 Stage Initial Submittal	4	1	4	70.00	280	\$75	\$21,000
HUD-9007a-ORCF	Lender Narrative - Substantial Rehabilitation - 2 Stage Final Submittal	4	1	4	70.00	280	\$75	\$21,000
HUD-9008-ORCF	Lender Narrative - Blended Rate - Single Stage	4	1	4	70.00	280	\$62	\$17,360
HUD-90025-ORCF	Lender Narrative - Blended Rate - 2 Stage - Initial Submittal	4	1	4	70.00	280	\$75	\$21,000

New Form Number	Form Name	Number of Respon- dents	Freq. of Resp.	Resp. per Annum	Avg. Burden per Hour per Resp.	Annual Burden Hours	Avg. Hourly Cost Per Resp.	Annual Cost
HUD-90025a- ORCF	Lender Narrative - Blended Rate - 2 Stage - Final Submittal	4	1	4	70.00	280	\$75	\$21,000
HUD-9009-ORCF	Lender Narrative 232(i) -Fire Safety Equipment Installation, without Existing HUD Insured Mortgage	5	2	10	15.00	150	\$62	\$9,300
HUD-90010-ORCF	Lender Narrative 232(i) -Fire Safety Equipment Installation, with Existing HUD Insured Mortgage	5	2	10	15.00	150	\$62	\$9,300
HUD-90011-ORCF	Lender Narrative 223(d) - Operating Loss Loan	1	2	2	15.00	30	\$62	\$1,860
HUD-9444-ORCF	Lender Narrative Cost Certification Supplement	2	2	4	15.00	60	\$75	\$4,500
Production Certifica	tions							
HUD-90012-ORCF	Consolidated Certification - Lender	30	2.5	75	1.00	75	\$67	\$5,025
HUD-90013-ORCF	Consolidated Certification - Borrower	77	1	77	1.00	77	\$75	\$5,775
HUD-90014-ORCF	Consolidated Certification - Principal of the Borrower	38	2	76	1.00	76	\$75	\$5,700
HUD-90015-ORCF	Consolidated Certification - Operator	35	2	70	1.00	70	\$75	\$5,250
HUD-90016-ORCF	Consolidated Certification - Parent of Operator	35	2	70	1.00	70	\$75	\$5,250
HUD-90017-ORCF	Consolidated Certification - Management Agent	35	2	70	1.00	70	\$75	\$5,250
HUD-90018-ORCF	Consolidated Certification - Contractors	4	1	4	1.00	4	\$75	\$300
HUD-90019-ORCF	Auditor Certification	3	1	3	0.50	1.5	\$67	\$101
HUD-90022-ORCF	Certification for Electronic Submittal	35	10	350	0.50	175	\$67	\$11,725
HUD-9445-ORCF	Certification of Outstanding Obligations	35	10	350	1.00	350	\$83	\$29,050
HUD-91118-ORCF	Borrower's Certification – Completion of Critical Repairs	240	1	240	0.50	120	\$75	\$9,000
HUD-92434-ORCF	Lender Certification	35	10	350	1.00	350	\$ 75	\$26,250
HUD-91130-ORCF	Building Code Certification	26	2	52	0.50	26	\$83	\$2,158
Construction Docum								
HUD-91123-ORCF	Design Professional's Certification of Liability Insurance	26	2	52	0.50	26	\$83	\$2,158
HUD-91124-ORCF	Design Architect Certification	26	2	52	0.50	26	\$83	\$2,158
HUD-91127-ORCF	Financial Statement Certification - General Contractor	26	2	52	0.50	26	\$67	\$1,742
HUD-92408-ORCF	HUD Amendment to B108	26	2	52	0.50	26	\$75	\$1,950
HUD-95379-ORCF	HUD Representative's Trip Report	26	28	728	1.00	728	\$75	\$54,600
HUD-91129-ORCF	Lender Certification for New Construction Cost Certifications	10	5.2	52	3.00	156	\$75	\$11,700
HUD-9442-ORCF	Memo for Post-Commitment Early Start of Construction Request	3	2	6	1.00	6	\$75	\$450

New Form Number	Form Name	Number of Respon- dents	Freq. of Resp.	Resp. per Annum	Avg. Burden per Hour per Resp.	Annual Burden Hours	Avg. Hourly Cost Per Resp.	Annual Cost
HUD-92415-ORCF	Request for Permission to Commence Construction Prior to Initial Endorsement for Mortgage Insurance (Post-Commitment Early Start of Construction)	3	2	6	0.50	3	\$83	\$249
HUD-93305-ORCF	Agreement and Certification	10	5.2	52	0.50	26	\$75	\$1,950
HUD-92441-ORCF	Building Loan Agreement	10	5.2	52	1.00	52	\$75	\$3,900
HUD-92441a- ORCF	Building Loan Agreement Supplemental	10	5.2	52	1.00	52	\$75	\$3,900
HUD-92450-ORCF	Completion Assurance	10	5.2	52	0.50	26	\$75	\$1,950
HUD-92442-ORCF	Construction Contract	10	5.2	52	1.00	52	\$75	\$3,900
HUD-92554-ORCF	Supplementary Conditions of the Contract for Construction	10	5.2	52	0.50	26	\$217	\$5,642
HUD-92456-ORCF	Escrow Agreement for Incomplete Construction	3	2	6	0.50	3	\$75	\$225
HUD-92479-ORCF	Offsite Bond - Dual Obligee	5	3	15	0.50	7.5	\$ 75	\$563
HUD-92452-ORCF	Performance Bond - Dual Obligee	5	5.2	26	0.50	13	\$217	\$2,821
HUD-92452A- ORCF	Payment Bond	5	5.2	26	0.50	13	\$75	\$975
HUD-92455-ORCF	Request for Endorsement	10	5.2	52	1.00	52	\$75	\$3,900
HUD-92023-ORCF	Request for Final Endorsement	10	5.2	52	1.00	52	\$75	\$3,900
HUD-92412-ORCF	Working Capital Escrow	10	5.2	52	0.50	26	\$75	\$1,950
HUD-91125-ORCF	Staffing Schedule	30	5.83	174.9	1.00	174.9	\$62	\$10,844
Additional ORCF Do	ocuments							
HUD-91708-ORCF	Agreement for Payment of Real Property Taxes	1	1	1	1.00	1	\$83	\$83
HUD-92576A- ORCF	Certificate of Need for Health Facility	3	2	6	0.50	3	\$83	\$249
HUD-90024-ORCF	Contact Sheet	35	10	350	1.00	350	\$67	\$23,450
HUD-91126-ORCF	Financial Statement Certification	150	7	1050	0.50	525	\$67	\$35,175
HUD-91116-ORCF	Addendum to Operating Lease	30	6.5	195	0.50	97.5	\$217	\$21,158
HUD-941-ORCF	Lenders FHA Number Request Form	30	11.7	351	0.50	175.5	\$62	\$10,881
HUD-92264a- ORCF	Maximum Insurable Loan Calculation	30	11.7	351	2.00	702	\$83	\$58,266
HUD-2-ORCF	Request for Waiver of Housing Directive	20	8	160	1.00	160	\$75	\$12,000
HUD-91119-ORCF	Schedule of Facilities Owned Operated or Managed	35	10	350	1.50	525	\$75	\$39,375
HUD-91110-ORCF	Subordination, Non-Disturbance and Attornment Agreement of Operating Lease (SNDA)	30	11.7	351	2.50	877.5	\$233	\$204,458
HUD-91111-ORCF	Survey Instructions and Borrower's Certification	180	1.5	270	0.50	135	\$83	\$11,205
HUD-91112-ORCF	Request of Overpayment of Firm Application Exam Fee	15	5.13	76.95	0.50	38.475	\$67	\$2,578
HUD-9839-ORCF	Management Certification— Residential Care Facility	5	1	5	0.50	2.5	\$75	\$188

New Form Number	Form Name	Number of Respon- dents	Freq. of Resp.	Resp. per Annum	Avg. Burden per Hour per Resp.	Annual Burden Hours	Avg. Hourly Cost Per Resp.	Annual Cost
HUD-92466-ORCF	Healthcare Regulatory Agreement - Borrower	35	10	350	0.50	175	\$217	\$37,975
HUD-92466A- ORCF	Healthcare Regulatory Agreement - Operator	10	2	20	0.50	10	\$217	\$2,170
HUD-94000-ORCF	Security Instrument/Mortgage/Deed of Trust	35	10	350	0.50	175	\$217	\$37,975
HUD-92070-ORCF	Lease Addendum	2	1	2	0.50	1	\$217	\$217
HUD-94001-ORCF	Healthcare Facility Note	35	10	350	1.00	350	\$75	\$26,250
HUD-91710-ORCF	Residual Receipts Note - Non Profit Mortgagor	5	2	10	0.50	5	\$75	\$375
HUD-92420-ORCF	Subordination Agreement - Financing	7	2	14	0.50	7	\$217	\$1,519
HUD-92223-ORCF	Surplus Cash Note	7	2	14	0.50	7	\$75	\$525
HUD-2205A-ORCF	Borrower's Certificate of Actual Cost	30	7.5	225	3.50	787.5	\$75	\$59,063
HUD-92323-ORCF	Operator Security Agreement	30	6.5	195	1.00	195	\$200	\$39,000
HUD-91128-ORCF	Initial Operating Deficit Escrow Calculation Template	11	5	55	1.50	82.5	\$83	\$6,848
HUD-92414-ORCF	Latent Defects Escrow	20	12	240	0.50	120	\$75	\$9,000
HUD-9443-ORCF	Minor Moveable Escrow	26	2	52	1.00	52	\$83	\$4,316
HUD-92476-ORCF	Escrow Agreement Noncritical Deferred Repairs	20	12	240	0.50	120	\$75	\$9,000
HUD-92476B- ORCF	Escrow Agreement for Operating Deficits	12	4.8	57.6	0.50	28.8	\$75	\$2,160
HUD-92464-ORCF	Request Approval Advance of Escrow Funds	35	15	525	1.00	525	\$75	\$39,375
Asset Management I	Documents							
HUD-92266-ORCF	Application for Transfer of Physical Assets (TPA)	25	2	50	1.50	75	\$83	\$6,225
HUD-93332-ORCF	Certification of Exigent Health & Safety (EH&S) Issues	456	1	456	1.00	456	\$ 75	\$34,200
HUD-93333-ORCF	Certification Physical Condition in Compliance	208	1	208	0.50	104	\$83	\$8,632
HUD-93486-ORCF	Computation of Surplus Cash	70	1	70	0.50	35	\$62	\$2,170
HUD-9250-ORCF	Funds Authorizations	500	5.6	2800	1.00	2800	\$75	\$210,000
HUD-9250A-ORCF	Borrower Certification and Request Detail	15	2	30	1.00	30	\$ 75	\$2,250
HUD-92228-ORCF	Model Form Bill of Sale and Assignment	20	2	40	1.00	40	\$83	\$3,320
HUD-92117-ORCF	Borrower's Certification – Completion of Non-Critical Repairs	250	2	500	0.50	250	\$75	\$18,750
HUD-92417-ORCF	Personal Financial and Credit Statement	175	6	1050	3.50	3675	\$83	\$305,025
HUD-93479-ORCF	Schedule A - Monthly Report for Establishing Net Income	60	2	120	1.00	120	\$75	\$9,000

New Form Number	Form Name	Number of Respon- dents	Freq. of Resp.	Resp. per Annum	Avg. Burden per Hour per Resp.	Annual Burden Hours	Avg. Hourly Cost Per Resp.	Annual Cost
HUD-93480-ORCF	Schedule B - Schedule of Disbursements	60	12	720	1.00	720	\$75	\$54,000
HUD-93481-ORCF	Schedule C - Schedule of Accounts Payable	60	12	720	1.00	720	\$75	\$54,000
Accounts Receivable	Documents	•						
HUD-90020-ORCF	A/R Financing Certification	50	3	150	0.50	75	\$217	\$16,275
HUD-92322-ORCF	Intercreditor Agreement (for AR Financed Projects)	30	5	150	1.50	225	\$200	\$45,000
Master Lease Docun	nents							
HUD-92211-ORCF	Master Lease Addendum	5	5	25	1.00	25	\$217	\$5,425
HUD-92331-ORCF	Cross-Default Guaranty of Subtenants	30	5.83	175	1.00	174.9	\$217	\$37,953
HUD-92333-ORCF	Master Lease SNDA	30	5.83	175	0.50	87.45	\$217	\$18,977
HUD-92335-ORCF	Guide for Opinion of Master Tenant's Counsel	30	5.83	175	1.00	174.9	\$217	\$37,953
HUD-92337-ORCF	Healthcare Regulatory Agreement - Master Tenant	30	5.83	175	0.50	87.45	\$217	\$18,977
HUD-92339-ORCF	Master Lease Estoppel Agreement	30	5.83	175	0.50	87.45	\$217	\$18,977
HUD-92340-ORCF	Master Tenant Security Agreement	30	5.83	175	1.00	174.9	\$217	\$37,953
Additional Legal Do	cuments							
HUD-91117-ORCF	Operator Estoppel Certificate	100	2	200	0.50	100	\$275	\$27,500
HUD-91725-INST- ORCF	Instructions to Guide for Opinion of Borrower's and Operator's Counsel	35	10	350	0.00	0	\$217	\$0
HUD-91725-CERT- ORCF	Exhibit A to Opinion of Borrower's Counsel - Certification	35	10	350	0.50	175	\$217	\$37,975
HUD-91725-ORCF	Guide for Opinion of Borrower's Counsel	35	10	350	2.00	700	\$217	\$151,900
HUD-92325-ORCF	Guide for Opinion of Operator's Counsel and Certification	30	6.5	195	1.50	292.5	\$200	\$58,500
	TOTALS	4,568	539	20,322	8.32	44,966	\$105	\$3,961,960

The Average Hourly Cost per Response is an estimate generated from third party respondents. Provided estimates average approximately \$74 per hour for non-legal forms and approximately \$216 per hour for legal forms.

- 13. There are no additional costs to respondents.
- 14. Annualized burden and cost to the Federal government: If the average burden hours for Federal government review of each form is estimated to be 2 hours, and the hourly cost is based on a GS 13/5 Federal salary base pay (\$38.92 per hour), and the estimated average number of submitted documents per year is 20,322 documents, then the average annualized burden and cost to the Federal government is \$1,581,864.
- 15. This is a new collection. The Commissioner has directed that the control, management operations, and oversight of the Section 232 Program be transferred from the Office of

Multifamily Housing Programs to the Office of Healthcare Programs. Therefore, all forms related to that program have been eliminated from this submission and will become the responsibility of the OHP.

- 16. Several of these documents are new to HUD, in order to better capture the needs related to healthcare facility applications and the new Section 232 division of OHP.
- 17. Collection of this information will not be published. Each form will be maintained with the HUD Program Office in individual case files.
- 18. HUD is not seeking approval to avoid displaying the OMB expiration date.
- 19. There are no exceptions to the Certification Statement identified in item 19 of Form OMB 83-I.

B.Collections of Information Employing Statistical Methods

This collection does not involve statistical methods.