

Department of the Treasury, Departmental Offices
Supporting Statement and Request for Clearance
Troubled Asset Relief Program – Making Home Affordable Participants

1. Circumstances necessitating the collection of information

Authorized under the Emergency Economic Stabilization Act (EESA) of 2008 (Public Law 110-343), the Department of the Treasury has implemented several aspects of the Troubled Asset Relief Program. Among these components is a voluntary foreclosure prevention program – Making Home Affordable (MHA) program, under which the Department uses TARP capital to lower the mortgage payments of qualifying borrowers. The Treasury does this through agreements with mortgage servicers (Servicer Participation Agreements, or SPAs) to modify loans on their systems. All servicers are eligible to participate in the program.

2. Use of the data

The information is used to set the servicers up on the data system, ensure that the servicers can be paid for the loan modifications that they undertake, check for compliance, and report out on the effectiveness of the program.

3. Use of information technology

Data will be collected in a number of formats. Most data will come into Fannie Mae (The Department of the Treasury's agent) in the form of a business-to-business data feed. Some supplemental data is provided via electronic transmission (e.g. Excel workbook) and will be transmitted through email or a web interface.

4. Efforts to identify duplication

The information that is collected has some overlap with similar data collected for other purposes (e.g. OCC collects monthly data to produce the Mortgage Metrics Report). Where possible this effort will use the same formats, definitions and fields.

5. Impact on small entities

As this is a voluntary program, participating servicers must establish controlled processes for data collection and transmission, and must take into account the burden to do so. In addition, there might be multiple delivery methods for smaller institutions that may lack the overall systems to send through an automated data feed. However, small institutions may not be subject to the burden of complicated system builds in order to accommodate program changes, potentially due to a less complicated IT infrastructure.

6. Consequences of less frequent collection and obstacles to burden reduction

If the information is not collected on a monthly basis, Treasury will not be able to pay the servicers for the modifications that they are undertaking.

7. Circumstances requiring special information collection

Not applicable.

8. Solicitation of comments on information collection

Treasury officials have consulted with the federal banking agencies, Freddie Mac, Fannie Mae, FHFA, HUD, and numerous servicers of all sizes to get feedback on data items for the collection. In addition, Treasury has gotten feedback from consumer advocacy groups concerning potential data fields they would like to see.

A notice soliciting public comments was published in the Federal Register on March 18, 2013 at 78 FR 16765 and no comments were received.

9. Provision of payments to recordkeepers

Fannie Mae is acting as the agent of Treasury for the collection of the data. They are performing other functions as well, and will receive payment for the totality of their work on behalf of the Department of the Treasury.

10. Assurance of confidentiality

The information collected will contain personal identification information, and as such will be treated as confidential. As part of the data collection effort, Treasury completed a Privacy Impact Assessment (PIA) that ensures privacy protection features of the databases and transmission systems to comply with all Federal privacy and consumer protection laws.

11. Justification of sensitive questions

Not applicable.

12. Estimated burden of information collection

The burden on all participating servicers varies significantly, and has been dependent on a number of factors for each servicer, including IT infrastructure complexity, volume of program participation, participation in additional program schedules (e.g. 2MP), etc. Small servicers have been released from their SPAs based on an assessment of their program burden(s) relative to the borrower benefits being offered.

Estimated annual burden:

# Respondents	# Responses Per Respondent	Annual Responses	Hours Per Response	Total Annual Burden
130	12	1560	8	12,480

13. Estimated total annual cost burden to respondents

Most participating servicers have modified their current loan reporting systems to participate in the program. This is a time- and resource-consuming process. However, as this is a voluntary program and servicers are being paid for each loan modification that they undertake, the costs are at least partially offset.

14. Estimated cost to the federal government.

There is no estimated cost to the federal government to receive this information.

15. Reasons for change in burden

There are no changes to the burden. This submission is being made for renewal purposes.

16. Plans for tabulation, statistical analysis and publication

The Treasury Department conducts numerous types of analysis on these data. These analyses will include assessments of the effectiveness of the program (e.g. volume, effectiveness, performance) as well as servicer compliance with program requirements. Some of these results are published in the Making Home Affordable Program Monthly Program Performance Report which is available on FinancialStability.gov. In addition, analysis loan-level data set of MHA programs is provided on a monthly basis as mandated by Dodd-Frank section 1483 via the same Treasury web site, modified for privacy and other concerns.

17. Reasons why displaying the OMB expiration date is inappropriate

Display of the OMB expiration date will create confusion because, under EESA, this program has a limited duration.

18. Exceptions to certification requirement of OMB Form 83-I

Regarding this request for OMB approval, there are no exceptions to the certification statement in item 19 of Form 83-I.