

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 2502-0605

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. There has been several updates since the last submission:

HUD has clarified the extent to which documents may be submitted electronically.

Also, in response to comments received by industry participants and in order to serve its clients better, HUD has made changes to form HUD-92322-ORCF, Intercreditor Agreement. The changes will provide clarity and understanding to the requirements for lenders. Changes involve 1) language updates for clarity, 2) restatements for understanding, and 3) detailed clarification of document definitions. There is no additional information collection or burden associated with these changes.

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.

A complete listing of burden hours (including form numbers and titles) 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

This information collection adds additional strength to the Strengthening Accountability final rule, published September 7, 2012, by providing tools with which the new rules are to be implemented. The documents provide a detailed mechanism for Section 232 participants to comply with the HUD regulations, in addition to providing consistent and efficient documentation for new transactions, across the Program. By now removing the requirement for paper submissions, this collection will now also provide a more efficient and effective application process.

3. Currently the collection of information is accessible via the internet, and forms are in Microsoft Word or PDF-fillable forms, thus allowing electronic submission, in addition to hard copy paper submissions. With the renewal of this information collection HUD is further increasing the acceptability of electronic submissions, and with the exception of the thirteen (13) documents outlined below (see item 14), HUD will no longer require the remaining healthcare facility documents be submitted in paper form. Electronic submission has been documented to save applicant staff preparation time, as well as printing and shipping costs, as demonstrated in the chart below.

Item	Cost per Item	Costs
Printing by Lender	1,500 pages at \$.04 per page	\$60.00
Lender Box Preparation	\$50 per hour and two hours per box	\$100.00
Shipping by Lender to HUD in Field	1 – 40 lb. box	\$20.00
HUD processing preparation (Field and HQ)	\$50 per hour and 1 hour per box	\$50.00
Shipping by HUD Field to HQ	1 – 40 lb. box	\$20.00
Total		\$250.00 per box
Estimated # Boxes per project	3	
Estimated # of projects per year	600	
Total Annual Costs	(# of boxes x # of projects x cost per box)	\$450,000.00

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.
5. 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. As updated by this collection renewal, ORCF requires one electronic copy of each application submission and only one hard copy of the thirteen (13) documents identified in Section 14, below, for file retention. Other transactional documents may be submitted in either electronic or hard copy format. In some cases additional hard copies may be requested as need, but on a limited basis. Because of the amount of money involved, other parties may 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 September 10, 2013. Vol. 78/No. 175/page 55282. No comments were received. Burden hours associated with the collection renewal have not been modified from the original collection.
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:

New Form Number	Form Name	Number of Respondents	Freq. of Resp.	Resp. per Annum	Avg. Burden per Hour per Resp.	Annual Burden Hours	Avg. Hourly Cost Per Resp.	Annual Cost
Lender Narratives								
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	4	1	4	70.00	280	\$75	\$21,000

New Form Number	Form Name	Number of Respondents	Freq. of Resp.	Resp. per Annum	Avg. Burden per Hour per Resp.	Annual Burden Hours	Avg. Hourly Cost Per Resp.	Annual Cost
	Rehabilitation - 2 Stage Initial Submittal							
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
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 Certifications								
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	1.50	6	\$75	\$450
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 Documents								
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

New Form Number	Form Name	Number of Respondents	Freq. of Resp.	Resp. per Annum	Avg. Burden per Hour per Resp.	Annual Burden Hours	Avg. Hourly Cost Per Resp.	Annual Cost
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
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 Documents								
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	0.50	175.5	\$233	\$40,892

New Form Number	Form Name	Number of Respondents	Freq. of Resp.	Resp. per Annum	Avg. Burden per Hour per Resp.	Annual Burden Hours	Avg. Hourly Cost Per Resp.	Annual Cost
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
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
Escrow Documents								
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 Documents								
HUD-92266-ORCF	Application for Transfer of Physical Assets (TPA)	25	2	50	1.00	50	\$83	\$4,150
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	0.50	20	\$83	\$1,660
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

New Form Number	Form Name	Number of Respondents	Freq. of Resp.	Resp. per Annum	Avg. Burden per Hour per Resp.	Annual Burden Hours	Avg. Hourly Cost Per Resp.	Annual Cost
HUD-93479-ORCF	Schedule A - Monthly Report for Establishing Net Income	60	2	120	1.00	120	\$75	\$9,000
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 Documents								
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 Documents								
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	8.30	44,221	\$105	\$3,794,809

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.

This is an extension of a currently approved collection, authorized by the Commissioner, with control, management, operations and oversight directed to the Office of Healthcare

Programs. Since the initial approval of this collection there have been no program changes that affect the burden. However, to further comply with the Paperwork Reduction Act, modifications have been made to the entire collection to allow for the electronic submission of all transactional documents, with the exception of thirteen (13) documents which will additionally require hard copy submission due to the legal nature of the documents and the necessity to have original signatures in HUD's files. These documents include the following:

1. Healthcare Regulatory Agreement – Borrower (HUD-92466-ORCF);
 2. Healthcare Regulatory Agreement – Operator (HUD-92466A-ORCF);
 3. Management Certification – Residential Care Facility (HUD-9839-ORCF);
 4. Lender Certification (HUD-92434-ORCF);
 5. Offsite Bond— Dual Obligee (HUD-92479-ORCF);
 6. Performance Bond – Dual Obligee (HUD-92452-ORCF);
 7. Payment Bond (HUD-92452A-ORCF);
 8. Request for Endorsement (HUD-92455-ORCF);
 9. Request for Final Endorsement (HUD-92023-ORCF);
 10. Guide for Opinion for Mater Tenant's Counsel (HUD-92335-ORCF);
 11. Healthcare Regulatory Agreement—Master Tenant (HUD-92337-ORCF);
 12. Guide for Opinion of Borrower's Counsel (HUD-91725-ORCF); and
 13. Guide for Opinion of Operator's Counsel and Certification (HUD-92325-ORCF).
15. This is the revision of the collection. HUD has clarified the extent to which the documents may be submitted electronically. There have also been changes to the form HUD-92322-ORCF, Intercreditor Agreement. However, these form changes have not affected the burden reporting. The actual form changes have not affected the burden reporting. Corrections were made to burden hour calculation, due to errors found in prior publications. The errors have been corrected. As stated previously, these documents work in conjunction with the new Strengthening Accountability rule, and assist the Section 232 applicants and participants in complying with the programmatic regulations and guidance.
16. Collection of this information will not be published. Each form will be maintained with the HUD Program Office in individual case files.
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 Form OMB 83-I.

B. Collections of Information Employing Statistical Methods

This collection does not involve statistical methods.