

Performing Loan Servicing for the Home Equity Conversion Mortgage (HECM)

A. Justification

1. Section 255 of the Housing and Community Development Act of 1987 (P.L. 100-242, 2/5/88) established a Federal Mortgage Insurance Program, Section 255 of the National Housing Act, to insure Home Equity Conversion Mortgages (HECMs). The regulatory authority is found at 24 CFR, Section 206.

Home Equity Conversion Mortgages (HECMs) allow eligible homeowners 62 years of age or older to convert a portion of accumulated home equity into monthly streams of income and/or lines of credit. Unlike a traditional home equity mortgage where the mortgagor makes principal and interest payments to a mortgagee, with a HECM, the mortgagee pays the mortgagor.

The Home Equity Conversion Mortgage (HECM) is the Department's reverse mortgage program, and is a major part of the current reverse mortgage market. Single Family Housing (specifically, the Office of Program Development) manages activities relating to the production of HECMs. The Office of Single Family Asset Management manages activities relating to the servicing of those loans.

The mortgagor has no personal liability for payment of the mortgage balance and enforcement of the debt is only through the sale of the property. The mortgagor may sell the property at any time for the lesser of the mortgage balance or the appraised value as determined under § 206.125(b) and, if the mortgage is due and payable at the time the contract for sale is executed, the mortgagor may sell the property for the lesser of the mortgage balance or five percent under the appraised value.

Pursuant to § 206.27(c), HECM loans become due and payable if a mortgagor dies and the property is not the principal residence of at least one surviving mortgagor or a mortgagor conveys all of his or her title in the property and no other mortgagor retains title to the property. HECM loans also become due and payable, upon approval of the Secretary, if the property ceases to be the principal residence of a mortgagor for reasons other than death and the property is not the principal residence of at least one other mortgagor or the mortgagor(s) fail to perform an obligation under the mortgage enumerated in § 206.27. The enumerated provisions include keeping the property in good repair and payment of taxes hazard insurance premiums, ground rents and assessments in a timely manner, except to the extent such property charges are paid by the mortgagee in accordance with in § 206.205.

Mortgagees may submit claims for the payment of mortgage insurance benefits in accordance with §§ 206.123 and 206.127 and the Secretary makes payments of acceptable claims under provisions of § 206.129.

2. This information request for OMB review is a comprehensive collection of requirements for mortgagees that service HECM mortgages and the HECM mortgagors who are involved with servicing-related activities. The following activities and requirements for this Paperwork Reduction Act (PRA) collection are set forth in 24 CFR 206.1 through 206.211, detailing the requirements pertinent to HUD's HECM program.

There are approximately ten mortgage mortgagee respondents. For most servicing activities, mortgagees use their own automated servicing systems to exchange information with HUD's Home Equity Reverse Mortgage Information Technology (HERMIT) system. Mortgagees handle all ongoing servicing activities of HECM loans, to include the following servicing requirements:

Escrow Administration

Collection and Accounting of Funds - Mortgagors may fund escrow set-asides by making periodic payments from their own funds, withholding of funds from monthly payments due to the mortgagor or by charging such funds to a line of credit. Mortgagees must facilitate the periodic collection of funds from mortgagors and maintain accounting records for these funds within their information systems and in HUD's HERMIT system.

Use of Funds - Funds in the escrow set-aside may only be used for property charge obligations. Determining the appropriate use of funds requires information gathered from the mortgagor about outstanding and future property charge obligations.

Escrow Set-Aside Administration - Applicable requirements for escrow set-aside accounts are referenced in OMB Collection of Information 2502-0583 for all FHA loans.

Timely Payments and Advances

Property Charge Payments - Funds in an escrow set-aside will be used by the mortgagee to pay property charges on behalf of the mortgagor when those charges become due. Currently property charge payments are being made by the mortgagee for about 10 percent of the portfolio. For the remaining loans, mortgagors are expected to make the property charge payments directly from their own funds. The number of current responses accounts for 10 percent of the portfolio of 700,000 loans and includes payment of taxes, insurance and in some cases, homeowners' association (HOA) dues. Over the next three years, the percentage of loans where property charges are paid by the mortgagees on behalf of mortgagors is expected to increase as new regulations and credit underwriting requirements take effect. The number of responses reflects the maximum number expected to be paid annually by all respondents in the next 3 years.

Evidence That Property Charges Have Been Paid - HUD regulations at § 206.205(a) require that mortgagors provide evidence of property charge payments they make to the mortgagee as required in the mortgage. If the mortgagor had elected to have the mortgagee pay the property charges, then the mortgagee would be required to obtain the amounts due, and retain proof of payment after the charges are paid. Mortgagees use tax services to obtain tax information and bills, and after payment, mortgagees receive a receipt from the taxing authority. The tax service can also confirm that taxes were paid before the mortgagee receives the receipt. The total number of loans for which property charges are currently being paid by the mortgagor is estimated to be 90 percent of the portfolio of 700,000 loans, or 630,000. Over the next 3 years as new regulations take effect this number will decrease.

Escrow Items - The appropriate actions to be taken by the mortgagee for the corresponding escrow items are described in OMB Collection of Information 2502-0583.

Execution of Payment Plan Changes - When a mortgagee is responsible to pay the mortgagor's property charges using funds withheld from term or tenure payments, and there are insufficient funds to pay those charges, it becomes necessary to execute a change in the payment plan. The mortgagee will initiate the preparation of the modified payment plan in response to the insufficiency of funds, and present the modified plan to the mortgagor for acceptance.

Analysis of Escrow Accounts

Analysis and Re-calculations of Funds used for Escrow Set Asides – Mortgagees, on a periodic timetable established by HUD, are required to analyze the balance and collection of funds used for the escrow set-aside to determine if there will be enough funds to make the upcoming property charge

payments for the mortgagor. Mortgagees are required to notify the mortgagor if any adjustments are necessary after a recalculation shows the **potential** for a surplus or shortage on the account. Currently, the number of accounts analyzed is assumed to be 10 percent of the portfolio of 700,000 loans. Over the next 3 years, the number of escrow set-aside accounts analyzed may include the entire portfolio of HECM loans. While information exchanges will flow from the analysis of escrow, the analysis itself does not invoke the PRA. The analysis of escrow accounts is a necessary part of business operations, and may be considered best practice in the mortgage industry, and in the HECM industry segment. -

Set-Aside Account Adjustments

There are three set aside accounts that are used for the purpose of paying mortgagor property charges: Escrow Set-Aside, Life Expectancy Set-Aside (LESA) Adjustments, Residual Income Shortfall Set-Aside (RISSA).

Shortages in Escrow Set-Aside – When appropriate, mortgagees are required to withhold or collect additional funds from the mortgagor to pay the remaining outstanding property charges due to a shortage in the escrow set-aside. In the event that this occurs, the mortgagee must receive a signed disclosure from the mortgagor.

Surplus in Escrow Set-Aside – When appropriate, mortgagees are required to apply escrow account overages to the account balance or return funds collected for purpose to pay property charges to the mortgagor or the mortgagor’s estate.

Providing Loan Information and Customer Services – Annual Statements

Mortgage Balance Disclosures – The mortgagee must provide the mortgagor with a written statement that details all account transactions that took place in the previous year. The annual notification is the subject of this request.

Escrow Disclosures – As part of the annual statement, mortgagees are required to describe the activities from the previous year related to the escrow set-aside.

Mortgage Insurance Premiums During Loan Servicing

Premium Types – All HECM mortgages require a mortgage insurance premium as a condition of insurance endorsement. There are three Premium payment types:

- “Up-Front” Premiums that are paid in a lump sum at loan origination;
- “Periodic” premiums paid monthly as a portion of the mortgagor’s mortgage payment; or
- “Up-Front” combined with “Periodic” Premiums

The “Up-Front” MIP payment, or any other term used to signify the initial MIP payment are handled by HECM mortgage originators. Required burden hours for collection and processing of the premiums are detailed in OMB control number 2502-0524.

“Periodic” MIP: Mortgages not included in those subject to the “Up-Front” MIP are subject to the “periodic” MIP for the life of the mortgage. The years required for risk-based periodic premiums vary depending on the date the mortgage closed and the amount of the mortgagor’s down payment. These premiums are paid monthly and escrows must be established for the payment of these premiums.

Payment of Periodic Premiums – Periodic mortgage insurance premiums are submitted by the mortgagee through the HERMIT system.

Ensuring Mortgagor Compliance

Property Inspections and Maintenance – As a requirement of the HECM mortgage, the mortgagor must maintain the condition of the property to a standard that is livable, durable, and safe for habitation. As required, the mortgagee must perform inspections of the property to ensure that the mortgagor is in full compliance of this provision. Form HUD-9519-A (Property Inspection Report) is the document on which the mortgagee will document property inspection findings. The form provides categories for the mortgagee to report the status of proposed and existing repair requirements. This report becomes a part of the case file which is uploaded as an attachment in HERMIT. HUD does not yet have approval for requiring regular inspections and completion of Form HUD-9519-A. Mortgagees consist of large industry lenders and mortgagees in addition to medium and smaller sized mortgagees. However, all have automated mortgage loan servicing systems that have the capability of servicing various types of loans and investors. Information required by HUD is routinely gathered and reported to HUD through HERMIT.

Annual Occupancy Certifications – As a requirement of the HECM mortgage, the mortgagor must certify that the home is being used as their principal residence at least once every twelve months. The mortgagees of HECM loans upload signed certifications into HERMIT and resets the timeline to prompt mortgagees to send the next year's certification requests.

Property Repair Administration

Requests for Disbursement of Funds - Mortgagors may make requests for disbursement of funds through the mortgagors' lines of credit, or from repair set aside accounts when repairs are completed, or from hazard insurance claim funds held by the mortgagees.

Extension Request to Complete Repairs Required as a Condition of the Mortgage, Or to Initiate Foreclosure - Mortgagors may make requests for extension of time to complete repairs that are required as a condition of the mortgage. After the mortgagee receives the extension request from the mortgagor, they must forward the request to HUD for approval. When HUD responds, the mortgagee responds to the mortgagor. The foreclosure extension in this regard would potentially be requested if the mortgagor failed to make the repairs and the mortgagee requested or received approval for a due and payable designation from HUD to foreclose. In that situation, the mortgagor may request a foreclosure extension to complete the repairs.

Report of Hazard Insurance Claims - On occurrence of insured damage events, mortgagors will file insurance claims under their hazard insurance policies. A mortgagor may submit insurance settlement proceeds to the mortgagee, and provide a letter of intent to perform repairs or to have the funds applied to the loan balance.

Request for Inspection of Repairs in Order to Release Funds - After a mortgagor completes the necessary repairs to the property, the mortgagor will request that the mortgagee have the repairs inspected. Once the inspection is cleared, the funds will be released to the mortgagor and the repair contractor.

Request for Excess Repair Set-Aside Funds to Be Disbursed to the Mortgagor or Moved into the Line of Credit after Repairs Are Completed - Mortgagees will disburse funds to the mortgagor and repair contractors when the repairs are completed and the inspections are cleared. If there are any excess funds after completion of the repairs, the mortgagor will advise the mortgagee whether the excess funds are to be paid to the mortgagor or left in the line of credit. The mortgagee will follow the mortgagors' instructions.

Request for a Change in Payment Plan

Request for a Change in Payment Plan - After calculating the payment plan change, the mortgagee has to send the payment plan change document to the mortgagor for signature. The mortgagor then has to return the signed document to the mortgagee so that the change can be completed. The mortgagee will then make the change in HERMIT and upload the signed document into HERMIT.

Loss Mitigation

Referral to a HUD-approved Housing Counseling Agency – The mortgagee is required to provide information to a delinquent mortgagor regarding local HECM counselors that can provide assistance to help the mortgagor cure the delinquency. Some of the mortgagors who are in default will be referred to HECM counselors.

Referring the mortgagor to federal, state, or local programs for assistance - Some of the mortgagors who are in default will be referred to federal state or local programs for assistance.

Refinancing of HECM loan – In servicing of a HECM delinquency, mortgagees are required to assess the mortgagor for ability to refinance the existing HECM mortgage into a new HECM mortgage to satisfy any outstanding arrearages for corporate advances made for property charges. HUD has determined that the process to assess mortgagors for a new HECM mortgages through internal underwriting analysis requires no additional burden hours. The duties and responsibilities of the mortgagee for underwriting and funding a HECM loan are universal to the mortgage lending industry; therefore no additional burden hours are assigned for the refinancing of a HECM mortgage in delinquency outside of what is expressed in OMB Information Collection 2502-0524.

Attempting to Negotiate a Repayment Plan and Request for Financial Information - Mortgagees are required to collect from mortgagors all necessary information to evaluate options for curing HECM mortgage delinquencies. The most common delinquency is the failure of the mortgagor to pay property charges associated with the property securing the HECM loan. Due to the rising number of loans that fall into this category, the FHA has introduced special loss mitigation policies and procedures to help mortgagees work with mortgagors to cure HECM delinquencies.

Analysis – The mortgagee is required to obtain from the mortgagor any documentation related to income, asset verification, expenses and the amount of surplus income the mortgagor has available to repay the delinquency over time. The mortgagee may, at its discretion, obtain this information in writing, via phone, during a personal interview or through a HUD- approved housing counselor who is providing counseling services to the mortgagor.

Repayment Plan Implementation – Based on the results of the financial analysis, the mortgagee shall determine the appropriate payment amount and time period for a repayment plan agreement with the mortgagor. For each agreement made, the mortgagee must create written documentation describing the terms of the agreement. The number of mortgagees who enter into a repayment plan and those who request a change in repayment plan each year is the number of new repayment plans that mortgagee administers annually.

Repayment Plan Failures – If the mortgagor does not perform on a repayment plan as agreed then the mortgagee must adhere to any guidance of performing additional loss mitigation steps before seeking approval from HUD to call the loan “Due and Payable”.

Report Generation - Mortgagees are required to report the current status of all delinquent loans monthly into HERMIT. A reporting capability is desired to generate reports from the data in HERMIT. Currently no report generation capability exists. The reporting capabilities are expected to be available within the next 3 years. The burden hours and costs are retained as placeholders in anticipation of the reporting capability becoming available.

Loss Mitigation Documentation - Mortgagees are required to maintain documentation of all loss mitigation efforts, including but not limited to attempts to contact mortgagors, communications with mortgagors, referrals to housing counselors, financial data used in the analysis of surplus income, any documented proof mortgagor hardship, and any certified agreements between the mortgagor and mortgagee. This documentation shall be maintained in a case record and/or claim file (as necessary) and uploaded to the HERMIT system.

Due and Payable Events

Requesting Due and Payable Designation – The mortgagee must request HUD approval for HECM loans to be called “Due and Payable” in the event that mortgagors are noncompliant with certain provisions of the HECM mortgage. Mortgagees are required to use the HERMIT system for this request. Not all loans that experience a due and payable event must immediately be declared or designated due and payable.

Providing Legal Documents Such As Power Of Attorney or Trust - Mortgagors are required to provide copies of legal documents such as a power of attorney or trust documents to the mortgagees at when such documents are executed. Mortgagees will upload a copy of each such document into HERMIT. A loan will become due and payable if the mortgagor dies and the property is not the principal residence of at least one surviving mortgagor or a mortgagor conveys his or her title in the property and no other mortgagor retains title to the property. Upon approval of the Secretary, a HECM loan may also be called “Due and Payable” if the property ceases to be the principal residence of at least one mortgagor or an obligation of the mortgagor under the mortgage is not performed. Legal documents would be generated from such activities.

Mortgagor or Estate Notification of a Due and Payable Event - Mortgagees must communicate with mortgagors or their estates upon occurrence of a due and payable event, provide information regarding available options and obtain needed documentation of a mortgagor’s death, title transfer, non-occupancy or failure to perform an obligation under the mortgage.

Due and Payable Notifications to Mortgagors/Heirs/Estates – After receiving approval of the Secretary, when needed, the mortgagee shall notify the mortgagor that the mortgage is due and payable.

Due and Payable Notifications to HUD – The mortgagee shall notify the Secretary whenever the mortgage is due and payable under the conditions stated in § 206.27c)(1), or one of the conditions stated in § 206.27c)(2) has occurred. Mortgagees are required to use the HERMIT system to provide the notification.

Post Due and Payable Event - Loss Mitigation Activities

Providing a Letter of Intent to Select an Option Other Than Foreclosure after Due and Payable Event - When mortgagees engage mortgagors in loss mitigation after a due and payable event, mortgagees may select an option other than foreclosure. The mortgagor must provide a letter of intent for the option selected. The options may include a payoff, sale of the property, or execution of a deed in lieu of foreclosure. The mortgagee will submit a copy of the letter of intent in HERMIT.

Signature to a Deed in Lieu of Foreclosure If That Option Is Selected - If a mortgagor letter of intent selects a deed in lieu of foreclosure, the mortgagees will send the prepared deed to the mortgagee for signature. Mortgagors must sign the deed and return it to the mortgagee for recording. An estimated 10 percent of those selecting an option other than foreclosure after a due and payable event will select the option to sign a deed in lieu of foreclosure.

Providing a Listing Agreement and the Sales Contract - If a mortgagee letter of intent selects a sale and payoff, or short sale, the mortgagor must provide a listing agreement and the sales contract when an offer is received. The mortgagor's, heirs, or estates that choose to sign a deed in lieu of foreclosure, an estimated 90 percent of them will provide a listing agreement and the sales contract pursuant to a sale of the property.

Mortgage Loan Servicing Transfers

Notification of Mortgage Transfers to HUD – When a HECM mortgage is transferred from one mortgagee to another mortgagee; the original mortgagee must update the case file in HERMIT within 15 days of the transfer.

Notification to Mortgagors of Mortgage Servicing Transfers - It is the responsibility of the receiving mortgagee to notify or arrange to notify the mortgagors of the transfer of the mortgagee responsible for servicing their loan.

Other Information Exchanges

Mortgagor Requests for Partial Release - On occasion, a mortgagor may wish to sell or convey a portion of the property covered under the mortgage to another party. An appraisal before and after the sale or conveyance will determine the value with and without the parcel to be released, and is used to determine if the remaining property has sufficient value to cover the mortgage debt. The mortgagor will submit the request with the appraisal to the mortgagee, who in turn will submit the documents to HUD. Once HUD approves or denies the request, the mortgagee will respond to the mortgagor, who then can complete the process or not, depending on HUD's approval.

Request for a Payoff Statement - Some mortgagors may wish to transfer the mortgaged property and pay off the HECM loan. Those mortgagors will request a payoff statement from the mortgagees. When processing a mortgagor for a repayment plan prior to submitting due and payable request, mortgagees must solicit a loss mitigation workout or a payoff from the mortgagor and respond to all mortgagor inquiries and requests for information about the mortgage. Such requests for information will include a loan payoff statement.

Request for Appraisal to Sell the Property – When a mortgagor wishes to sell or transfer the property, the mortgagee will request an appraisal and submit the results of the appraisal in HERMIT.

3. **Mortgagees Use of HERMIT** - Mortgagees handle all ongoing servicing activities of HECM loans, including remitting monthly insurance premiums to HUD. HUD estimates that HECM services are servicing approximately 700,000 loans. Mortgagees use their own automated servicing systems to exchange information with HUD's HERMIT system generally on a monthly basis. Mortgagee Letter 2012–17 announced the release of HERMIT. OMB Number 2502–0524 identifies a supporting document for the PRA package accompanying the release of HERMIT. The Supporting Document for OMB Number 2502-0524 included collections for origination and servicing activities that are reported into HERMIT. This supporting statement is the information collection that pertain to HECM servicing. Included here are all information exchanges of mortgagees and mortgagors that are not deemed industry standard, and for which HUD estimates the burden hours in the accompanying table.

HECM servicing activities that involve information exchanges with HERMIT are described in Section 2 of this PRA collection. The use of HERMIT is expected to reduce the burden of mortgagees over time and relieve the need to maintain paper documentation of communications with mortgagors.

4. There is no duplication of information. Mortgagees routinely document mortgage loan servicing activities as a part of their own loan servicing and internal quality control procedures. HUD will accept the various formats already in use by mortgagees as long as the information is complete.
5. The collection of this information will not have a significant impact on a substantial number of small businesses.
6. The information is required to ascertain whether the mortgagee has performed adequate and prudent mortgage loan servicing and whether the mortgagor has maintained full compliance with all provisions of the HECM mortgage. The information is necessary in order to protect the FHA insurance fund and the interests of industry participants and current and future mortgagors. Without the collection of information, the Federal Program would be open to misuse and lead to an abundance of industry and consumer complaints. To maintain the integrity and solvency of the HECM program and provide necessary oversight, must be collected and reported to HUD through the HERMIT system.
7. The special circumstances requiring the mortgagee to perform a financial assessment while the mortgage loans are in default is required so that appropriate servicing actions can be conducted in a timely manner and HUD can be notified of loan events, as necessary.
8. In accordance with 5 CFR 1320.8(d), this information collection soliciting public comments were announced in the *Federal Register* on April 29, 2014 (Volume 79, Number 82, Page 24002) No comments were received. The ability to provide the information required by this process, and the use of the information, is discussed with the mortgage loan industry on a continuing basis and at yearly functions, meetings and personal contact by various HUD staff and managers. FHA has a close working relationship with approved FHA mortgagees who service HECM loans, thus, it is our custom to contact members of the National Reverse Mortgage Mortgagee's Association to solicit their input on this collection.
9. The collection of this information does not provide for payments or gifts to respondents (mortgagees or mortgagors).
10. The Privacy Act of 1974 protects respondents who meet the information reporting requirements. There are no other pledges of confidentiality.
11. The information collection contains questions of a sensitive nature. Explanations to be given to persons from whom the sensitive information is requested is provided in the related MLs.
12. Estimated Burden and Cost to Respondents:

Analysis of Burden Hours and Costs

1	Information Collection	Number of Respondents	Response Frequency (average)	Number of Responses	Burden Hour Per Response	Annual Burden Hours	Hourly Cost /Response	Annual Cost
2	Escrow Account and Escrow Set-Aside Administration							
3	Collection and Accounting of Funds	10	70,000	700,000	None, this is an industry standard	0	\$15.00	0
4	Use of Funds	10	70,000	700,000	None, this is an industry standard	0	\$15.00	0
5	Escrow Administration	10	70,000	700,000	None, this is an industry standard	0	\$15.00	0
6	Property Charge Payments	10	175,000	1,750,000	0.5	875,000	\$15.00	13,125,000
7	Evidence That Property Charges Have Been Paid	10	63,000	630,000	0.2	126,000	\$15.00	1,890,000
8	Escrow Items	10	70,000	700,000	None, this is an industry standard	0	\$15.00	0
9	Execution of Payment Plan Changes	10	7,000	70,000	0.5	35,000	\$15.00	525,000
10	Escrow Analysis	10	70,000	700,000	None, this is an industry standard	0	\$15.00	0
11	Escrow Shortages	10	46,667	466,667	None, this is an industry standard	0	\$15.00	0
12	Escrow Surpluses	10	23,333	233,333	0.2	46,667	\$15.00	700,000
14	Providing Loan Information and Customer Services							
15	Monthly Statements	10	840,000	8,400,000	None, this is an industry standard	0	\$15.00	0
16	Annual Statements	10	70,000	700,000	None, this is an industry standard	0	\$15.00	0
17	Mortgage Insurance Premiums							

18	Periodic MIP Payments	10	840,000	8,400,000	0.1	840,000	\$15.00	12,600,000
22	Property Repair Administration							
23	Requests for Disbursement of Funds	10	1,750	17,500	0.4	7,000	\$15.00	105,000
24	Extension Request to Complete Repairs Required As a Condition of the Mortgage	10	1,750	17,500	0.4	7,000	\$15.00	105,000
25	Report of Hazard Insurance Claims	10	1,750	17,500	0.4	7,000	\$15.00	105,000
26	Request for Inspection of Repairs in Order to Release Funds	10	1,750	17,500	0.4	7,000	\$15.00	105,000
27	Request for Excess Repair Set Aside Funds to Be Disbursed to the Mortgagor or Moved into the Line of Credit after Repairs Are Completed	10	1,750	17,500	0.4	7,000	\$15.00	105,000
28	Occupancy Certification	10	70,000	700,000	0.1	70,000	\$15.00	1,050,000
30	HECM Loss Mitigation							
31	Attempting to negotiate a repayment plan	10	8,400	84,000	0.5	42,000	\$15.00	630,000
32	Referral to HECM Counselor	10	4,200	42,000	0.1	4,200	\$15.00	63,000
33	Referring the mortgagor to federal or state or local programs for assistance	10	2,520	25,200	0.1	2,520	\$15.00	37,800
34	Mortgagors providing evidence of application to any such available programs	10	840	8,400	0.25	2,100	\$15.00	31,500
35	Mortgagor providing confirmation of approval for assistance	10	420	4,200	0.25	1,050	\$15.00	15,750
36	Execution of any agreed-upon repayment plan	10	3,780	37,800	0.5	18,900	\$15.00	283,500
37	HECM Loan Refinance	10	120	1200	0.5	600	\$15.00	9,000

39	Request for a Change in Repayment Plan	10	945	9,450	0.25	2,363	\$15.00	35,438
40	Providing a Letter of Intent to Select an Option Other Than Foreclosure after Due and Payable Even.	10	7,000	70,000	0.25	17,500	\$15.00	262,500
41	Signature to a Deed in Lieu of Foreclosure If That Option Is Selected.	10	2,100	21,000	0.25	5,250	\$15.00	78,750
42	Providing a Listing Agreement and the Sales Contract	10	1,890	18,900	0.25	4,725	\$15.00	70,875
44	Repayment Plan Administration	10	4,725	47,250	0.25	11,813	\$15.00	177,188
46	Loss Mitigation Reporting	10	8,280	82,800	0.10	8,280	\$15.00	124,200
48	Mortgage Loan Servicing Transfers							
49	Notification to HUD	10	3,500	35,000	None, this is an industry standard	0	\$15.00	0
50	Notification to Mortgagors	10	3,500	35,000	None, this is an industry standard	0	\$15.00	0
51	Due and Payable Events and Post Events							
52	Requesting Due and Payable Designation From HUD	10	3,500	35,000	0.10	3,500	\$15.00	52,500
53	Provide Any Legal Documents Such As Power Of Attorney or Trust, If Applicable	10	140	1,400	0.33	467	\$15.00	7,000
54	Mortgagor Or Estate Notification to Mortgagee of a Due and Payable Event	10	1,750	17,500	0.17	2,917	\$15.00	43,750
55	Providing Mortgagee with a Death Certificate or Evidence of Non-Occupancy	10	1,750	17,500	0.33	5,833	\$15.00	87,500
56	Due and Payable Notification to Mortgagor/Heirs/Estates	10	7,000	70,000	None, this is an industry standard	0	\$15.00	0
57	Due and Payable Notification to HUD	10	7,000	70,000	0.1	7,000	\$15.00	105,000
58	Claims due to Termination of Insurance							
59	Claim submission via HERMIT	10	7,000	70,000	0.1	7,000	\$15.00	105,000
60	Mortgagors' Requests for Partial Release	10	7,000	70,000	0.17	11,667	\$15.00	175,000
61	Requests for payoff Statements	10	7,000	70,000	0.17	11,667	\$15.00	175,000

6 2	Request for Appraisal to Sell Property if Not Due and Payable	10	7,000	70,000	0.17	11,667	\$15.00	175,000
	Information Exchange With HERMIT							
6 3	Information Exchange With HERMIT For the above activities	10	1,274,443	12,744,433	0.15	1,911,665	\$15.00	28,674,975
64	Totals	10	3,324,110	33,241,100		3,060,683		\$45,910,250

13. There are no additional costs to respondents or record keepers beyond those identified in sections 12 and 14 resulting from the collection of this information.
14. There is no annual cost to the Federal government.
15. This is a new collection that includes some information that is compiled from other collections that are currently approved. The figures for the Estimated Burden and Cost to Respondents are more accurate than the approved PRAs from which topics were compiled because HUD is detailing the activities specific to HECM mortgagees.
16. There are no plans to publish this information collection for statistical use.
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. All forms will be modified upon OMB review.

B. Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methods.