

# Supporting Statement for Paperwork Reduction Act Submissions

## Housing Counseling Program – Home Equity Conversion Mortgage Counseling Client Session Evaluation OMB No. 2502 – 0585 (HUD-92911)

---

### A. Justification:

#### 1. Overview of Home Equity Conversion Mortgage Counseling Program

The Single Family Program Support Division is responsible for administration of the Department's Housing Counseling Program, authorized by Section 106 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701w and 1701x). A final Housing Counseling rule was published in the Federal Register at 72 FR 55638 and codified at 24 CFR Part 214. Among other types of housing counseling, the Housing Counseling Program supports the delivery of counseling for the Home Equity Conversion Mortgages (HECM) to consumers who are at least 62 years old. This counseling provides information to the consumer regarding reverse mortgages and the suitability of a reverse mortgage for their unique situation.

As a condition of eligibility to receive a Home Equity Conversion Mortgage, consumers must participate in reverse mortgage counseling. As part of the housing counseling program evaluation, performance reviews are conducted at the HUD-approved counseling agencies by HUD staff. HUD staff mails the HECM Counseling Session Evaluation to consumers who have recently received counseling. The evaluation is used as a performance tool and it provides valuable feedback to HUD regarding the customer service and the counseling quality provided by the HECM counseling agency being reviewed.

#### 2. Information Submission

As part of the housing counseling program evaluation, performance reviews are conducted at the HUD-approved counseling agencies by HUD staff. HUD staff mails the HECM Counseling Session Evaluation to consumers who have recently received counseling. The evaluation is completed by the consumer and mailed back to HUD. The evaluation is used as a performance tool and it provides valuable feedback to HUD regarding the customer service and the counseling quality provided by the HECM counseling agency being reviewed.

#### 3. Automation

The collection of information will be automated in those instances when an e-mail address is available for the client. HUD will e-mail the HECM Counseling Session Evaluation to the client with a return e-mail address, along with a mailing address.

#### 4. Duplication of Information

The HECM Counseling Session Evaluation is the only information collected regarding the quality of the counseling and customer service provided by the housing counseling agency. There is no duplication of information.

## 5. Effects on Small Entities

The information collection is the same for all entities, regardless of size. The Information requested is used as a performance tool to evaluate the HECM counseling provided by housing counseling agencies being reviewed.

## 6. Failure to Collect Information

Failure to collect the information described in this submission would prevent FHA from obtaining valuable information from consumers regarding their HECM counseling experience. This information is used as a performance tool during the evaluation of the agency. Information supplied on the HECM Counseling Session Evaluation could determine any actions that would need to be taken against the counseling agency. FHA also utilizes this information to make changes in policies and procedures where applicable.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner: No special circumstances exist

- \* requiring respondents to report information to the agency more often than quarterly;

Not applicable.

- \* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

Not applicable.

- \* requiring respondents to submit more than an original and two copies of any document; \* requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;

Not applicable.

- \* in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;

Not applicable.

- \* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

Not applicable.

- \* that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use;

Not applicable.

- \* requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

Not applicable.

## 8. Solicit Public Comments

In accordance with the regulations at 5 CFR 1320.8(d), HUD published a *Federal Register* notice seeking public comments on the information collection prior to submission to OMB. The notice was published on Monday, January 25, 2016, (Vol.: 81, No.: 15. Page: 4059 ). No Comment were received.

9. There are no payments to respondents.
10. No assurance of confidentiality is provided. The HECM Counseling Session Evaluation is not subject to the Privacy Act since there is no personal information requested from the respondents.
11. Sensitive Information

There are no questions of a sensitive nature that are asked in the HECM Counseling Session Evaluation.

12. Annual Reporting Burden

<b>HECM Counseling Clients</b>							
<i>Form</i>	<b>Number of Respondents</b>	<b>Number of Responses</b>	<b>Frequency of Responses</b>	<b>Hours of Response</b>	<b>Burden of Hours</b>	<b>Hourly Rate</b>	<b>Total Cost</b>
<i>HUD- (92911)</i>	300	300	1	.17	51	\$12.00	\$612.00
The 300 respondents represent the number of consumers receiving HECM counseling who are likely to respond. \$12.00/hour rate based on average rate for Housing Counseling agencies which ranged from about \$11.50/hour to \$13.50/hour.							

13. There are no additional costs to respondents.
14. Costs to the Federal Government:
 

There is no cost to the Federal Government.
15. This is an extension of a currently approved collection.
16. HUD will not publish the results of this information collection.
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.