

2016 SUPPORTING STATEMENT

7 CFR Part 1942, Subpart A - “Community Facility Loans– Re-lending Provision” 0575-NEW

A. Justification

1. Explain the circumstances that make the collection of information necessary.

Rural Development is amending its Community Facility Loan regulation to enable the Agency to make loans to qualified lenders (hereinafter referred to as “re-lenders”) who will then in turn re-loan those funds to eligible applicants/borrowers for eligible projects under the Community Facility Loan program. This effort provides a new way to build financing capacity and achieve Administrative and Congressional goals of providing economic benefit in areas of greatest need in rural America. The projects re-lenders finance will improve access to health care, education and other critical services, which will help ensure that rural communities are strong, viable and economically well off.

Information collected from the re-lender is necessary to determine re-lender eligibility which includes legal authority, compliance with federal, state, and local requirements, experience, and financial strength. The information collection and recordkeeping requirements outlined in this supporting statement are part of an emergency clearance request. Rural Development will address any public comments it receives and provide evidence of reaching out to stakeholders upon resubmission to OMB for approval. Upon OMB approval, this collection package and burden will be merged into the existing Community Facility Loans burden package – OMB No. 0575-0015.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the Agency has made of the information received from the current collection.

The information will be collected by Rural Development national office and field offices from re-lenders. This information is used to determine re-lender eligibility to participate in the Community Facilities program, to document that re-lenders have adequate security to protect the financial interest of the Government and to provide on-going reporting data to ascertain re-lenders operate on a sound basis including adhering to civil rights requirements.

To participate in the Community Facilities re-lender provision, re-lenders must make application to Rural Development, provide financial information, certifications and other documentation to support their eligibility and priority to receive funding. Documents or documentation in this category include the following:

REPORTING REQUIREMENTS – Non Forms

Documentation of Legal Powers

Only re-lenders with legal authority to make and service loans involving community infrastructure and development will be eligible. Documentation may come in the form of a legal opinion or a copy of the re-lenders organizational documents. This information is to be collected to meet the requirements of the Interim Rule §1942.30(a)(1).

Certification of compliance with federal, state and local requirements

Re-lenders responsible for administering a loan fund need to understand and be in compliance with laws impacting their operations and the operations of the clients they serve. Examples include local building requirements, state laws regarding certificates of need for health care facilities, Equal Credit Opportunity Act, and environmental compliance. This information is to be collected to meet the requirements of the Interim Rule §1942.30(a)(2).

Documentation of Serving Persistent Poverty County(ies) or High Poverty Areas

Re-lenders are required to provide documentation of their current portfolio or experience providing loans in Persistent Poverty County(ies) or High Poverty Area(s) to determine eligibility and priority. This documentation is also used in the evaluation factors and does not need to be duplicated. This information is to be collected to meet the requirements of the Interim Rule §1942.30(a)(3).

Documentation from a Financial Institution that an Irrevocable Letter of Credit or similar Performance Guarantee will be issued if re-lender is approved for funding

Re-lenders will provide this documentation at the time of application for eligibility. The purpose of this documentation (also referred to as a “Letter of Intent”) is to insure Rural Development that the re-lender is creditworthy for the amount of financial assistance requested. This information is to be collected to meet the requirements of the Interim Rule §1942.30(a)(5).

Documentation of being Regulated and Supervised by a Federal or State Banking Regulatory Agency, Subject to Credit Examination, Not on a Watch List, and No Regulatory Actions Outstanding

Based on the Agency’s assessment of mission driven lending institutions primarily serving rural high poverty communities, we estimate approximately 45% of re-lenders will meet this eligibility criteria and provide this documentation. The documentation insures Rural Development that the re-lender has the requisite capital, asset quality, management, earnings, liquidity, and sensitivity to market risk to operate a federally financed loan fund. This information is to be collected to meet the requirements of the Interim Rule §1942.30(a)(7)(i).

Documentation of strong Financial Strength and Performance rating

Based on the Agency’s assessment of mission driven lending institutions primarily serving rural high poverty communities, we estimate approximately 20% of re-lenders already have a rating in place or will obtain such a rating to document this eligibility criteria. The assessment, conducted by an independent third party, evaluates overall creditworthiness based on an analysis of past financial performance, current financial strength, and apparent risk factors. The documentation insures Rural Development that

the re-lender has the requisite capital, asset quality, management, earnings, liquidity, and sensitivity to market risk to operate a federally financed loan fund. This information is to be collected to meet the requirements of the Interim Rule §1942.30(a)(7)(ii).

Documentation of being a financially sound institution

Based on the Agency's assessment of mission driven lending institutions primarily serving rural high poverty communities, we estimate approximately 35% of re-lenders will need to undergo an assessment by Rural Development to assess their capital adequacy, adequate liquidity, management capabilities, repayment ability, credit worthiness, balance sheet equity & other financial factors. To conduct the assessment, as outlined in the Interim Rule §1942.30(a)(7)(iii)(B), Rural Development requires the following documentation:

- A. 3 years audited financial statements
- B. Interim financial statements as of most recent quarter end
- C. Auditor's most recent management letter and management's response
- D. Operating Budget versus Actual for last completed fiscal year and most recent quarter-end
- E. Schedule of outstanding debt (name of creditor, balance, origination and maturity dates, note rate, collateralization), and attach covenants
- F. Schedule of 5 largest sources of grant funding over each of the last 3 fiscal years (including grantor name, amount granted, description of allowable uses or any restrictions)
- G. Schedule of 5 largest investors over each of the last 3 fiscal years (including investor name, total investment, form of investment, description of allowable uses or any restrictions)
- H. Schedule of any other funding sources, including off-balance sheet financing, for the last completed fiscal year and most recent quarter-end
- I. List and description of any contingent liabilities
- J. Schedule of loans receivable (including borrower, loan type, description of collateral, original and maturity dates, note rate, current status e.g. delinquency or nonaccrual)
- K. Schedule of loans restructured and modified in each of the last 3 fiscal years and most recent YTD (including borrower, pre and post-mod loan terms, and current payment status)
- L. Schedule of loans charged off in each of the last 3 fiscal years and most recent YTD, with any recoveries realized
- M. Any external loan reviews performed over the last 3 years.
- N. Bylaws
- O. Credit policies and procedures (loan underwriting, servicing, portfolio management)
- P. Loan risk grading and assessment system
- Q. Enterprise risk management policies and procedures
- R. Disaster recovery plan
- S. Accounting policies (including loss reserve policies)
- T. Staff organizational chart, including names and titles for senior staff
- U. Organizational chart showing relationships to any parents, subsidiaries, or affiliates
- V. Management Team resumes

- W. Succession plans for key leadership and staff
- X. Board roster, with affiliations
- Y. Board meeting minutes for past year
- Z. Board meeting packets for last year
- AA. Most recent strategic plan
- BB. Most recent annual report
- CC. Description of programs, financial and non-financial products and services

Documentation of Legal, Non-governmental Status (except for Tribal governments)

Only non-governmental organizations (except for Tribal governments) will be eligible to participate as a re-lender. Documentation may come in the form of a legal opinion or a copy of the re-lenders organizational documents. This documentation is also used to determine legal powers and does not need to be duplicated. This information is to be collected to meet the requirements of the Interim Rule §1942.30(a)(8).

Documentation of Membership in a National Organization that provides training, technical assistance and credit evaluation or certified by a Government agency as having a primary mission of promoting development in low-income target markets and performs training and technical assistance as part of that mission.

This documentation is used to determine re-lender eligibility. The purpose of the information is to provide Rural Development with assurances of the re-lender's basic credentials and professional standing in their industry and that their mission is aligned with the goals of the re-lending provision. This information is to be collected to meet the requirements of the Interim Rule §1942.30(a)(9).

Certification to loan a majority of funds to applicants whose projects are located in or serve Persistent Poverty County(ies) or High Poverty Area(s)

This certification for eligibility will provide to Rural Development the re-lender's commitment to providing economic benefit in areas of greatest need in rural America. Rural Development will review the re-lender's loan disbursements to determine that this eligibility criteria is met. This information is to be collected to meet the requirements of the Interim Rule §1942.30(a)(10).

RD Instruction 1970-A, Exhibit H, "Multi-tier Action Environmental Compliance Agreement"

This agreement is signed by the re-lender (primary recipient of the loan funds) before Rural Development moves forward with obligation of the initial aggregated funds. The agreement stipulates the re-lender's environmental compliance requirements for applicant loans. This information is to be collected to meet the requirements of the Interim Rule §1942.30(a)(11).

Documentation of Assistance Provided to Rural Development Employees (written)

Re-lenders must identify and report any known relationship or association with an RD employee such as close personal association, immediate family, close relatives, or business associates. This includes any assistance provided to employees. This

information is to be collected to meet the requirements of the Interim Rule §1942.30(a)(11).

Documentation of each evaluation factor (written)

Re-lender applications will be prioritized for funding based on years of loan fund experience, lending history in Persistent Poverty County(ies) or Poverty Areas, and discretionary points for geographic distribution, emergency conditions, and natural disasters. This information is to be collected to meet the requirements of the Interim Rule §1942.30(a)(11).

Workers Compensation Insurance, if applicable

This form of insurance is normal in any organization and Rural Development requires it to be available at the time of application. However, insurance requirements will not normally exceed those proposed by the re-lender. This information is to be collected to meet the requirements of the Interim Rule §1942.30(a)(11).

Irrevocable Letter of Credit

This document or a similar type of performance guarantee serves as security for the loan between the re-lender and Rural Development and will be required by all re-lenders prior to loan disbursement. This document is issued by a financial institution. This information is to be collected to meet the requirements of the Interim Rule §1942.30(e)(3).

Loan Origination and Servicing – applicant eligibility

Applicants will apply directly to re-lenders for financial assistance. Re-lenders will be responsible for insuring applicants and the applicant's projects are eligible under 7 CFR 1942 Subpart A, Community Facilities Loan program and underwriting the loans for financial feasibility. Applicants applying to re-lenders will meet the same application requirements as applicant's applying to Rural Development including all environmental review requirements of 7 CFR 1970. No additional burden by Rural Development will be placed on the applicant. Re-lenders will pass through to Rural Development certain applicant documents to obtain Rural Development concurrence in applicant eligibility, project eligibility and eligible rural area as outlined in the Interim Rule §1942.30(f)(1)(i).

Loan Origination and Servicing – reporting

Rural Development will monitor the re-lender's portfolio on a quarterly and annual basis to insure the re-lender remains a financially sound institution in compliance with its Re-lender's Agreement. This information is to be collected to meet the requirements of the Interim Rule §1942.30(f)(1)(iii).

REPORTING REQUIREMENTS - Forms

RD 1942-46, "Letter of Intent to Meet Conditions" (OMB Control No. 0575-0015)

The re-lender completes this form to indicate the intent to meet the conditions of the loan closing(s). This information is necessary for Rural Development to continue further

processing of the loan application and is collected to meet the requirements of the Interim Rule §1942.30(e)(5).

RD 1942-XX “Re-lender’s Agreement”

This agreement is necessary to insure the re-lender is informed about its responsibilities and agrees to comply. The agreement covers among other things the following information: loan terms; disbursement procedures; responsibilities related to compliance with 7 CFR 1942, Subpart A with respect to eligible applicants and projects, Civil Rights, environmental, security, planning, bidding, contracting, construction and servicing; collateral, insurance and reporting requirements; and default provisions. This form is collected to meet the requirement of the Interim Rule §1942.30(e)(1).

RD 1942-XX “Promissory Note”

This document is executed by the re-lender as evidence of its indebtedness to Rural Development. This form is collected to meet the requirement of the Interim Rule §1942.30(e)(2).

RD 1942-XX “Loan Resolution Security Agreement”

This document is executed by the re-lender to attest to its legal authority as an organization to enter into the specific loan transaction, and provides for the pledging of certain assets to secure Rural Development’s loan to the re-lender. This form is collected to meet the requirement of the Interim Rule §1942.30(e)(4).

RD 440-11, “Estimate of Funds needed for 30-day Period Commencing” (OMB Control No. 0575-0015)

This form is a request used by the re-lender to indicate the amount of funds required for a 30-day period. It is concurred in by Rural Development as to the reasonableness of the amount. This form is collected to meet the requirement of the Interim Rule §1942.30(f)(1)(vi).

RD 440-24, Position Fidelity Schedule Bond Declarations of other evidence of coverage (OMB Control No. 0575-0015)

This form may be used by organizations (where permitted by state law) to provide fidelity bond coverage for certain officials entrusted with funds. It is required at application and thereafter annually as a reporting requirement. This information is collected to meet the requirement of the Interim Rule §1942.30(a)(11).

RD 442-7, “Operating Budget” (OMB Control No. 0575-0015)

The form is used by the re-lender to project income and expense items and a complete cash flow through the first full year of the loan proceeds. These projections are necessary in determining the source and reliability of the projected income and the adequacy of resources to repay the loan in a timely manner. This form is collected to meet the requirement of the Interim Rule §1942.30(a)(11).

RD 400-1, “Equal Opportunity Agreement” (OMB Control No. 0575-0018)

The form is completed by the re-lender when construction work is subject to the provisions of the Civil Rights compliance requirements that contractors cannot discriminate against any employee or applicant for employment because of race, color, religion, sex, or national origin. This form is collected to meet the requirement of the Interim Rule §1942.30(a)(11).

RD 400-4, “Assurance Agreement” (OMB Control No. 0575-0018)

The form is completed by the re-lender and used to confirm that recipients of Rural Development loans have been reminded of their obligation to comply with all provisions of the Civil Rights Act of 1964 and regulations of Rural Development. This form is collected to meet the requirement of the Interim Rule §1942.30(a)(11).

AD-1047, “Certification Regarding Debarment, Suspension & Other Responsibility Matters-Primary Covered Transactions (OMB Control No. 0505-0027)

USDA regulations published at 7 CFR Part 3017 implement the government-wide debarment and suspension system for USDA’s non procurement transactions. Applicants and re-lenders are required to provide certification under these regulations. Form AD-1047 may be used to obtain the required certification. This form is collected to meet the requirement of the Interim Rule §1942.30(a)(11).

FORM BURDEN APPROVED UNDER OMB NUMBERS

SF 424, “Application for Federal Assistance” (OMB Control No. 4040-0004)

Re-lenders use this form to apply under the re-lending provision. This is a common form, and as such, the numbers have been accounted for through the Request for Common Forms. This form is collected to meet the requirement of the Interim Rule §1942.30(a)(11).

SF 424A, “Budget Information – Non-Construction Programs (OMB Control No. 4040-0006)

Re-lenders use this form to project costs and expenses for the re-lending provision. The form also provides Rural Development information on matching funds. This form is collected to meet the requirement of the Interim Rule §1942.30(a)(11).

SF 424B, “Assurances – Non-Construction Programs (OMB Control No. 4040-0007)

Re-lenders read and sign this form to indicate the organization’s intent to comply with the laws, regulations, and policies to which a loan is subject. This form is collected to meet the requirement of the Interim Rule §1942.30(a)(11).

AD 3030, “Representations Regarding Felony Convictions and Tax Delinquency Status for Corporate Applicants” and AD 3031, “Assurances Regarding Felony Convictions and Tax Delinquency Status for Corporate Applicants” (OMB Control No. 0505-0025)

Completed by the re-lender once at the time of application. These two forms are required by Public Law 112-55. This form is collected to meet the requirement of the Interim Rule §1942.30(a)(11).

SF LLL, “Certification of Non-Lobbying Activities or Disclosure of Lobbying Activities” (OMB Control No. 4040-0013)

Re-lenders who are awarded loans over \$100,000 and/or lobby are required to complete this form. This form is collected to meet the requirement of the Interim Rule §1942.30(a)(11).

SF 3881, ACH Vendor/Miscellaneous Payment Enrollment Form (OMB Control No. 1510-0056)

The re-lender and its financial institution will complete this form and provide it to Rural Development. The information contained in the form will be used to establish an electronic transfer of loan funds to the re-lender. This form is collected to meet the requirement of the Interim Rule §1942.30(a)(11).

RECORDKEEPING REQUIREMENTS

Quarterly Financial Statements

Re-lenders will be required to submit financial statements quarterly to Rural Development. Rural Development will use the information to monitor the credit worthiness and paying capacity of the re-lender. Financial statements will include a verification by an official of the re-lender’s organization. This information is collected to meet the requirement of the Interim Rule §1942.30(f)(1)(iii).

Quarterly report of re-lent loans

Re-lenders will provide a report that includes the following: borrower name, outstanding principal and interest balance, status, amount and due date of the next installment due, and servicing actions conducted for any delinquent loan. Rural Development will use the information to monitor the current credit worthiness and paying capacity of the borrowers and to insure that re-lenders are adequately servicing the loan accounts in compliance with the Re-lender’s Agreement. This information is collected to meet the requirement of the Interim Rule §1942.30(f)(1)(iii).

Annual Audit

Annual audits are required from all re-lenders. The audits help Rural Development determine if the operations are sound and the intended services are being provided to the public. Often Rural Development can use the audits to predict developing financial problems and suggest corrective steps before the problems become serious. This information is collected to meet the requirement of the Interim Rule §1942.30(f)(1)(iii).

Financial Strength and Performance Rating

Re-lenders will provide Rural Development with their most recent Financial Strength and Performance Rating, not more than 3 years old, as conducted by an independent third party. The assessment includes overall creditworthiness based on an analysis of past financial performance, current financial strength, and apparent risk factors. The documentation insures Rural Development that the re-lender continues to have the requisite capital, asset quality, management, earnings, liquidity, and sensitivity to market

risk to operate a federally financed loan fund. This information is collected to meet the requirement of the Interim Rule §1942.30(f)(1)(iii).

Certification Re-lender and Borrower have met requirements of 7 CFR 3575.42 and 7 CFR 3575.43

Re-lenders are required to inform Borrowers of their responsibility for planning, bidding, contracting and construction and certify at the end of construction that all funds were utilized for authorized purposes. This information is collected to meet the requirement of the Interim Rule §1942.30(f)(1)(iv).

Civil Rights data

Re-lenders are required to comply with Title VI of the Civil Rights Act of 1964. They will collect and maintain data on Applicants by race, sex, and national origin, and ensure that Applicants also collect and maintain the same data on beneficiaries. Rural Development will use the information to conduct a compliance review once every three years. This information is collected to meet the requirement of the Interim Rule §1942.30(f)(1)(v).

Documentation of providing funds to Persistent Poverty County(ies) and High Poverty Area(s)

Re-lenders will provide this documentation to meet the additional terms specified in the annual Notice so Rural Development can monitor the re-lender's agreement to loan a majority of funds to applicants whose projects are located in these areas. Documentation is accessible to the re-lender at public websites identified by Rural Development in the annual Notice. This information is collected to meet the requirement of the Interim Rule §1942.30(f)(1)(iii).

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.

Information needed is specific to each re-lender. The Agency has many requirements that involve certifications from the re-lender as well as other parties involved. The Agency could not comply with legislative mandates without these certifications. All of the public use forms have been automated and put on the internet to comply with the Government Paperwork Elimination Act; however, at this time, the Agency is not collecting any of this information through an electronic application system. Based on the eGov initiative, all efforts will be made to comply with the migration of federal forms into web-based fillable format consistent with the Agency's timeline.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The Agency has reviewed all loan programs it administers to determine which programs may be similar in intent and purpose. The Agency has other programs that are similar. If

there were simultaneous participation in more than one Agency's programs, the Agency would make every effort to accommodate the requests within the same set of applications and processing forms. This effort is presently facilitated by assignment of management of these programs to the same program area of responsibility. If a re-lender is applying for or receiving a loan from another Federal agency, forms and documents furnished by the other agency would be utilized to the extent possible.

5. If the collection of information impacts small businesses or other small entities (item 5 of OMB Form 83-1), describe any methods used to minimize burden.

Information to be collected is in a format designed to minimize the paperwork burden on small businesses and other small entities. The information collected is the minimum needed by the Agency to approve loans and monitor re-lender performance.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The information collected under this program is considered to be the minimum necessary to conform to the requirements of the program regulations established by law. Information is collected only when needed, and we believe no reduction of collection is possible. Failure to collect proper information could result in improper determinations of eligibility, improper use of funds, and/or unsound loans.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

a. Requiring respondents to report information more than quarterly.

There are no information collection requirements that require specific reporting on more than a quarterly basis.

b. Requiring written responses in less than 30 days.

There are no specific information collection requirements that require less than 30 days response. However, in many cases, especially where a re-lender's income or financial situation has declined, it benefits the re-lender to provide the Agency with information as soon as possible. The Agency cannot provide the re-lender with program benefits until documentation is received to support the re-lender's request.

c. Requiring more than an original and two copies.

There are no specific information collection requirements that require more than an original and two copies.

d. Requiring respondents to retain records for more than 3 years.

There are no such requirements.

e. Not utilizing statistical sampling.

There are no such requirements.

f. Requiring use of statistical sampling which has not been reviewed and approved by OMB.

No such requirements exist.

g. Requiring a pledge of confidentiality.

There are no such requirements.

h. Requiring submission of proprietary trade secrets.

There are no such requirements.

8. If applicable, identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection. Summarize public comments received and describe actions taken by the agency in response to these comments. Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, reporting format (if any), and on data elements to be recorded, disclosed, or reported.

In accordance with the Paperwork Reduction Act of 1995, the Agency embedded a 60-day Notice in the Final Rule in the Federal Register on June , 2016 in Vol. 81, no. __ , pg. ____ .

Multiple organizations were contacted for input on re-lender documentation. Their cumulative responses helped to form the requirements and documentation level of the re-lender. Based on these third party inquiries, the Agency determined the paperwork, reporting burden, and frequency of information collection was reasonable and common in the re-lending industry.

9. Explain any decision to provide any payment or gift to respondents, other than reenumeration of contractors of grantees.

No such decisions or payments were made.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy.

No assurance of confidentiality was provided. The information collected under the provisions of this program is not considered to be of a confidential nature. Organizations

such as nonprofit entities from which the information is collected ordinarily are required to make their activities available for public scrutiny.

11. Provide additional justification for any question of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private.

The information collected does not contain any questions of a sensitive nature such as sexual behavior, religious beliefs, or other matters commonly considered private.

12. Provide estimates of the hour burden of the collection of information.

This submission is for 70 respondents with 790 responses and 1,462 burden hours. Rural Development estimates 20 re-lender applications, 10 re-lenders approved for funding and 50 applicant loans among the 10 re-lenders on an annual basis.

See attached spreadsheet for breakdown.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

The estimated number of total man-hours on an annual basis is 1,462 for a total cost of \$121,346 ($\$83 \times 1,462$). The cost of the regulations as a burden to the public was computed on the basis of \$83.00 per hour. This is the wage class most comparable to what eligible nonprofit employee compensation would be to process the information requested. This is the same wage class used in the Intermediary Relending Program which has a similar type of re-lender (0570-0021 dated February 2016).

14. Provide estimates of annualized cost to the Federal Government.

The annual cost, which includes benefits, travel, communication, supplies, information technology, etc., for the Agency to develop and administer this regulation is \$213,360. This cost is based on a GS-12 loan specialist in each state office and one GS-13 loan specialist in the National Office for an average of \$41/hour and contracting with financial underwriting experts to perform the Agency assessment of a financially sound institution at a cost of \$155/hour. The numbers in the table below reflect receipt of 20 re-lender applications, 10 re-lenders approved for funding, and 50 applicant loans among the 10 re-lenders on an annual basis.

Activity	Estimated Average Annual Hours	Estimated 3-Year Average Annual Burden
Receipt of application & eligibility determination 73.5 specialist hours x \$41 = \$3,013.50 1,015 contractor hours x \$155 = \$157,325	1088	\$160,338
Priority scoring, selection determination and	50	2,050

approval		
Review re-lender disbursement requests	100	4,100
Prepare closing documents and close loans	175	7,175
Review quarterly & annual reports	213	8,713
Conduct Compliance Reviews	24	984
Total	0	0
Technology upgrades – one time cost		\$30,000

15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of the OMB Form 83-1.

This is a new information collection.

16. For collection of information whose results will be published, outline plans for tabulation and publication.

There are no plans to publish the information collected under the provisions of the program.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

These forms are used in other Rural Development information collections; therefore, it is not practical to include an OMB expiration date because of the different expiration dates for each collection. RHS is seeking approval to not display the OMB expiration date on these forms.

18. Explain each exception to the certification statement identified in Item 19 on OMB 83-1.

No exceptions are requested.

19. How is this information collection related to the Service Center Initiative (SCI)? Will the information collection be part of the one stop shopping concept?

This information collection is not related to the Service Center Initiative.