

# Supporting Statement for Paperwork Reduction Act Submissions

## Single Family Premium Collection Subsystem-Upfront OMB Control Number 2502-0423

### A. Justification

1. Regulations at 24 CFR 203.259a; 203.280; 203-281; and 203-283 authorize the collection, calculation, and refunds of a one-time mortgage insurance premium (MIP). Lenders use the Single Family Premium Collection Subsystem-Upfront (SFPCS-U) to remit the upfront premium to obtain mortgage insurance for the homeowner.
2. SFPCS-U strengthens HUD's ability to manage and process upfront single-family mortgage insurance premium collections and corrections to submit data. It also improves data integrity for the Single Family Mortgage Insurance Program. FHA approved lenders use Automated Clearing House (ACH) applications for all transmissions with SFPCS-U. The collection of information is used to update HUD's Single Family Insurance System. The information collection is also used in calculating refunds due to former FHA mortgagors when they apply for homeowner refunds of the unearned portion of the mortgage insurance premium, 24 CFR 203.283, as appropriate. Without this information the premium collection/monitoring process would be severely impeded, and program data would be unreliable. In general, lenders use the ACH applications to remit the upfront premium through SFPCS-U to obtain mortgage insurance for the homeowner.
3. Pay.gov was developed to meet the commitment of the United States federal government and the U.S. Department of the Treasury's Financial Management Service to process collections electronically using Internet technologies. Pay.gov satisfies the demands of agencies and consumers for electronic alternatives by providing the ability to complete forms, make payments, and submit queries 24 hours a day electronically. This modification of the existing process was made in response to the Department of the Treasury's mandate for all agencies to switch from their current lockbox services to Treasury's Pay.gov collection service. HUD will electronically collect the remittance and there is no paperwork to complete or mail-in.
4. This information does not duplicate information under any of HUD information collections.
5. This information will not impact on small businesses or other small entities.
6. The information collection is required of the remitting mortgagee and shall accompany all upfront payments sent to HUD through ACH and collected and reported by SFPCS-U. If this information collection is not conducted or is conducted less frequently, the consequence to the single-family mortgage insurance program is that incomplete and/or inaccurate data may delay endorsement of the FHA case involved.

Mortgagees are required by 24 CFR 203.280 to provide the required information when the upfront mortgage insurance premium is due to the Department, which is the time of settlement when the FHA mortgage closes.

7. \* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; N/A  
\* requiring respondents to submit more than an original and two copies of any document; N/A  
\* requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years; N/A  
\* 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; N/A

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

\* 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; or N/A

\* 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. N/A

- 8. In accordance with 5 CFR 1320.8(d), this information collection soliciting public comments was announced in the *Federal Register* on Thursday, April 14, 2016 (Volume 81, Number 72, Page 22102). No comments were received.
- 9. No gift or payment is provided to respondents.
- 10. Confidentiality is not an issue for the data involved.
- 11. No questions of a sensitive nature are involved.
- 12. Estimate of public burden:

| Information Collection | Number of Respondents | Frequency of Response | Responses Per Annum | Burden Per Response | Annual Burden Hours | Hourly Cost Per Response | Annual Cost |
|------------------------|-----------------------|-----------------------|---------------------|---------------------|---------------------|--------------------------|-------------|
| MIP's                  | 2,711                 | 2.779                 | 7,534               | .15                 | 1,130.10            | 16.17                    | \$18,273.72 |
|                        |                       |                       |                     |                     |                     |                          |             |

Hourly rate is based on an estimate of the annual salary of the lender's clerical staff at \$33,634.00.

- 13. There are no additional costs to the respondents.
- 14. Federal Government Costs: There is no additional cost to HUD for the collection of this information.
- 15. This is a revision of a currently approved collection. There is an increase in the number of lenders to account for all FHA-approved lenders. Additionally, there has been growth in the number of refinance loans due to the lower interest rates. HUD has decreased its estimate of burden hours per response because the transactions are all electronic.
- 16. The results of the information collection will not be published.
- 17. We are not seeking approval to avoid displaying the expiration date.
- 18. There are no exceptions to the certification statement identified in item 19.

**B. Collections of Information Employing Statistical Methods**

This information collection does not employ statistical methods.

