

**Mortgage Record Change**  
**OMB Control Number 2502-0422**  
**HUD-92080**

**A Justification:**

1. The servicing of insured mortgages must be performed by a mortgagee that is approved by HUD to service insured mortgages. The Mortgage Record Change information is used by FHA-approved mortgagees to comply with HUD requirements for reporting the sale of a mortgage between investors and/or the transfer of the mortgage servicing responsibility, as appropriate. The information is collected electronically through Electronic Data Interchange and via FHA Connection. The authority for this collection of information is specified in 24 CFR 203.431 and 24 CFR 203.502.
  2. The information required is used to update HUD's Single Family Insurance System and other related systems. Current data is necessary to establish mortgage premium liability, forward annual premium mortgage data to the appropriate mortgagee/servicer, and maintain premium receivables and program data regarding investors/servicer activity. Without the required data the premium collection/monitoring function would be severely impeded and program data would be unreliable. This information is essential because the data is used to update the Single Family Premium Collection System-Periodic and is used in the accurate billing of monthly premiums as HUD does case level accounting in recording premium payments by mortgagees.
  3. The information is collected 100% through electronic means. Last fiscal year approximately 7,000 lenders submitted 4,000,000 transfers electronically through Business-to-Government, Electronic Data Interchange and HUD's FHA Connection. The utilization of the Business-to-Government (B2G), Electronic Data Interchange and FHA Connection eliminate the completion and submission of hard copy source documents for the submission of transfer information.
  4. No other duplicate data exists. The data is not available from other sources.
  5. Small businesses or other small entities are not respondents.
  6. Information is collected whenever servicing of any mortgage is transferred from one mortgage holder or service to another. Without the required data the premium collection/monitoring function would be severely impeded and program data would be unreliable.
  7. Current guidelines for servicing procedures give the mortgagee 15 days from the date of the sale of a mortgage or the transfer of servicing to provide the required data. Any further delay in providing the data would erode the reliability and effectiveness of the program functions, which depend on timely mortgage activity information.
- \* requiring respondents to report information to the agency more often than quarterly;  
Lenders report any time the servicing on a loan is transferred to another lender.
- \* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

The mortgagee 15 days from the date of the sale of a mortgage or the transfer of servicing to provide the required data.

\* 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;

No

\* 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;

There is no statistical survey.

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

There is no statistical survey.

\* 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;

There is no pledge of confidentiality.

\* 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.

There is no pledge of confidentiality.

8. HUD consults with Mortgage Bankers through the Mortgage Bankers Association (MBA) outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported. Consultation with MBA representatives of those from whom information is to be obtained or those who must compile records should occur every year. The collection was published in the Federal Register on Wednesday, July 12, 2017. ( Vol.: 82; No.: 132; Page.: 32195) 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. An estimate of the total number of burden hours needed to prepare the information collection is 400,000 (a burden of one tenth hour per response based on the actual time required to key and transmit data to B2G, the FHA Connection or EDI) (HUD-92080), the number of respondents is approximately 7,000, the frequency of response is as required, and the volume of response per respondent is 20 to 700 annually depending on the size of their FHA portfolio. The public reporting burden for this collection of information is estimated to average 0.1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and keying and transmitting the collection of information.

13. **An estimate of the annual cost burden to respondents is \$4,000,000 using an hourly rate of \$10.00 for data entry.**

ICR	Respondents	Annual Responses	Total Responses	Hrs per Response	Total Annual Hours
92080	7,000	Varies	4,000,000	0.1	400,000

14. An estimate of the annualized cost to the Federal Government is \$400,000 including:

- i. \$100,000 for EDI maintenance by a contractor and
- ii. \$300,000 for processing rejected data by 4 FTP's.

15. This is an extension of a currently approved, collection. There are no program changes or adjustments.

16. The results of this information collection will not be published.

17. We are not seeking approval to not display the expiration date.

18. There are no exceptions to the certification statement.

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

The collection of information does not employ statistical methods.