

**PAPERWORK REDUCTION ACT
CHANGE WORKSHEET**

Agency/Subagency U.S. Department of Housing and Urban Development Office of Housing, Office of Healthcare Programs, Office of Residential Care Facilities (ORCF)	OMB Control Number 2502-0605
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<i>Enter only items that change</i>		<i>New record</i>
Agency form number(s)	Current record	
Entire Collection		
Annual reporting and recordkeeping hour burden		
Number of respondents		
Total annual responses	0	0
Percent of these responses collected electronically		
Total annual hours	0	0
Difference		
Explanation of difference		0
Program change		0
Adjustment		
Annual reporting and recordkeeping cost burden (in thousands of dollars)		
Total annualized Capital/Startup costs		
Total annual costs (O&M)		
Total annualized cost requested		
Difference		
Explanation of difference		
Program change		
Adjustment		

Other changes:**

Summary

ORCF is requesting a non-substantial change request to update its current OMB 2502-0605 portfolio to an automated collection via the new Section 232 Healthcare Portal, as a follow-up as stated in the current Supporting Statement on file.

There is no anticipated increase in burden hours, and there are no changes to the current associated documents in the information collection 2502-0605. Now that funding has become available, the change request would be to specify that the documents and information requests shall now be submitted specifically via the Section 232 Healthcare Portal, in the place of the current electronic process.

Background

In the currently approved Supporting Statement for collection 2502-0605, that was effective 06/2014, ORCF's Supporting Statement stated that the collection of information was accessible via email and facsimile using forms in Microsoft Word, Excel or PDF-fillable forms, thus allowing electronic submission. At that time, the Supporting Statement also clarified that application submission documents for 13 legal documents are required to be submitted in hard copy, with wet signatures, at the time of final loan closing, but are still to be submitted electronically for the initial application review. Electronic submissions have been documented to save applicant staff preparation time, as well as printing and shipping costs, as demonstrated in the chart included in the approved Supporting Statement:

Item	Cost per Item	Costs
Printing by Lender	1,500 pages at \$.04 per page	\$60.00
Lender Box Preparation	\$50 per hour and two hours per box	\$100.00
Shipping by Lender to HUD in Field	1 – 40 lb. box	\$20.00
HUD processing preparation (Field & HQ)	\$50 per hour and 1 hour per box	\$50.00
Shipping by HUD Field to HQ	1 – 40 lb. box	\$20.00
Total		\$250.00/box
Estimated # Boxes per project	3	
Estimated # of projects per year	600	
Total Annual Costs	(# of boxes x # of projects x cost per box)	\$450,000.00

The Supporting Statement discussed the data collection, automation, infrastructure and other related IT processes that were being reviewed and researched at that time, including use for the ongoing asset management documents, not just the application submission documents. It was documented in the Supporting Statement that development, review, testing and understating of the internal and external submission feasibility were required and being investigated but were limited due to financial constraints.

The Supporting Statement additionally stated that “it is imperative that the automatic system is developed adequately to address concerns for confidentiality, due to the nature of data reported. Until the IT transformation had been able to establish such security and a platform that will house these new capabilities, it was difficult to establish a viable electronic intake process that will be sustained.”

Also included in the currently approved 2502-0605 information collection package was the Initial Privacy Assessment (IPA), which further clarified that “When HUD published the ORCF Document collection in March 2013, the initial expiration date provided by OMB was only for one year. This was a shorter effective term than the more typical three-year effective period for PRA-processed documents. The reason was that the Department had not yet worked through certain electronic document submission matters, and a decision was made to provide for a longer effective period after the electronic submission matters were addressed. Thus, on September 10, 2013, HUD published a Federal Register Notice specifically setting forth the proposed electronic submission policy and invited public comment. The policy allows for the electronic submission of all transactional documents in the collection, and only requires that 13 of the legal closing documents be provided via hard copy. The electronic submissions are not via a specific online system, but rather are submitted to HUD via email, facsimile, CD drive or flash drive.”

Change Request

Based on the approved document collection, Supporting Statement, and IPA submitted in 2013 and effective in 2014, ORCF has been collecting application submission, asset management, and other processing documents in electronic format, but not via a specific online mechanism. In November 2016, a format for online electronic collection of documents has been researched, funded, established, tested and is ready for implementation. Since the entire document collection is already formatted to be submitted electronically, and all ORCF staff receive documents in electronic formats from all industry participants (with the exception of the few, limited documents that are required legally to be submitted additionally in hard copy, with wet signatures), the request is now being made to use the online Section 232 Healthcare Portal as the required submission method for all documentation, whether for application or ongoing asset management requests.

As mentioned, there are not changes being made to the burden requirements, nor to the documents themselves. The documents (in their Microsoft Word, Excel or PDF formats) will still be submitted to HUD/ORCF in those same formats, and maintained using the same storage and archiving methods previously established; however, the documents would now be directly uploaded into the Section 232 Healthcare Portal for submission to ORCF.

Additionally, the Section 232 Healthcare Portal is being enhanced to collect information for the optional lender delegated approval processes, and can allow industry participants to submit ORCF approval requests directly into the Section 232 Healthcare Portal. Automation and/or ORCF review will then determine if a request is approved, and the submitter will receive an automated response from the Portal itself.

If you have questions regarding this request, please let us know.

Signature of Senior Official or designee:	Date: 11/18/2016	For OIRA Use _____ _____
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**This form cannot be used to extend an expiration date.