

BUREAU OF CONSUMER FINANCIAL PROTECTION

**PAPERWORK REDUCTION ACT REQUEST
JUSTIFICATION FOR A NO MATERIAL NON-SUBSTANTIVE CHANGE**

**TRUTH IN LENDING ACT (REGULATION Z) 12 CFR 1026 O
MB NO. 3170-0015**

The information collections and associated burdens for Regulation Z are generally accounted for under Office of Management and Budget (OMB) control number 3170-0015, “Truth in Lending Act (Regulation Z) 12 CFR 1026.” However, the information collection requirements and associated burdens for certain amendments to Regulation Z are currently approved by OMB under four other OMB control numbers: OMB numbers 3170-0023; 3170-0026; 3170-0028; and 3170-0031.

The Bureau is requesting to move the information collections and associated burdens from the above noted OMB control numbers to OMB control number 3170-0015. The Bureau believes that inventorying all the information collections and associated burdens for Regulation Z under one OMB control is more transparent for the public.

The burden for OMB control numbers 3170-0023; 3170-0026; 3170-0028; and 3170-0031 are listed in the below table which also calculates the new total burdens for OMB control 3170-0015.

Summary of Burden Transferred

OMB#	TITLE OF COLLECTION	NO. OF RESPONDENTS	NO. OF RESPONSES	BURDEN HOURS	COST BURDEN
3170-0023	High-Cost Mortgage and Homeownership Counseling Amendments to the Truth in Lending Act (Regulation Z)	55	185	12	\$0
3170-0026	Appraisals for Higher-Risk Mortgage Loans Amendment (Regulation Z)	2,047	3,475	516	\$0
3170-0028	Mortgage Servicing Amendment (Regulation Z)	824	26,284,297	74,509	\$10,355,994
3170-0031	Loan Originator Compensation Amendment (Regulation Z)	8,254	49,958	94,635	\$265,388
Total Transferred Burden		11,180	26,334,255	169,672	\$10,621,382
Current Burden for 3170-0015		2,643	216,724,041	10,055,000	\$9,400,000
New Burden for 3170-0015*		13,823	243,058,296	10,224,672	\$20,021,382

* Since there is no new burden, the transferred burden is considered an adjustment.

Currently, OMB control number 3170-0015 is scheduled to expire on 10/31/2018. The request to renew OMB's approval for the information collections approved under this OMB control number; including those transferred from OMB numbers 3170-0023; 3170-0026; 3170-0028; and 3170-0031 (collectively, the information collections contained in Regulation Z), will be included in this forthcoming request. The renewal request will also clearly identify the collections and associated burdens that were transferred into OMB number 3170-0015.