



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-8000

ASSISTANT SECRETARY FOR HOUSING-  
FEDERAL HOUSING COMMISSIONER

Ms. Rita Young  
OMB Policy Analyst  
Office of Management and Budget  
Office of Information and Regulatory Affairs  
New Executive Office Building  
Washington, DC 20503

Dear Ms. Young:

The Department of Housing and Urban Development (HUD) is seeking an emergency review of the Paperwork Reduction Act requirements for two new HUD Forms 1) Lender's Certification Regarding: Electronic Submission of Closing Documents and 2) the Escrow Agreement for Deferred Repairs & Debt Service - 223(f). The Notice of Paperwork Submission (copy enclosed), proposed for immediate Federal Register publication, explains the burden of the collection requirements and invites public comment on them.

In compliance with the requirements of 5 CFR 1320.13, this letter requests emergency processing within 14 days from the date of publication of the Federal Register Notice. We are presenting this request to you due to the current COVID-19 Coronavirus outbreak and the President's declaration of a national emergency. While HUD and its offices remain open for business and many employees are engaged in full-time telework, the Office of General Counsel ("OGC") in collaboration with Multifamily Programs established protocols, rules, and procedures that best ensure continuity of operations in the event of an extended closure of a specific division, regional or field office, or the determination that OGC and HUD in its entirety should work remotely.

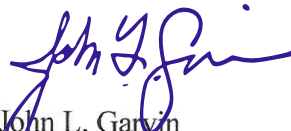
The emergency review is necessary in this case to implement uniform electronic closing protocols and best practices for the continued delivery of legal services to perform closings of multifamily FHA-insured mortgages using the *Electronic Lender's Certification*. We also request to implement the use of the *Debt Service Escrow Agreement* to mitigate any increased rent collection losses and income disruption associated with market rate refinance transactions.

Multifamily Housing has prepared the emergency PRA package for the two new Forms under the title: "*COVID-19 HUD Contingency Plan for HUD Multifamily Rental Project Closing Documents.*"

Pursuant to 5 CFR 1320.13 (a)(2), the Department has determined that adherence to normal clearance procedures would likely result in public harm related to COVID-19 Pandemic and the economic disruption it may have caused citizens in the United States.

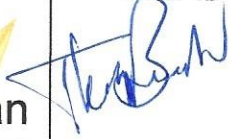
Thank you for your consideration. Please contact Wendy Houston, MF Policy Technical Specialist, FHA Multifamily Production at [Wendy.N.Houston@hud.gov](mailto:Wendy.N.Houston@hud.gov) if you have any questions.

Sincerely,



John L. Garvin  
General Deputy Assistant Secretary for Housing-  
Federal Housing Commissioner

Enclosures

Internal HUD Distribution:					
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<a href="https://hudgov-my.sharepoint.com/personal/wendy_n_houston_hud_gov/Documents/HUD%20C%20drive/OMB/EMERGENCY%20PRA%20-%20escrow%20agreement%209/Emergency%20%20Submission/Draft%20Emergency%20Letter_%20Contingency%20Plan%20Lender%20Cert_DSR%20Escrow.docx?web=1">https://hudgov-my.sharepoint.com/personal/wendy_n_houston_hud_gov/Documents/HUD%20C%20drive/OMB/EMERGENCY%20PRA%20-%20escrow%20agreement%209/Emergency%20%20Submission/Draft%20Emergency%20Letter_%20Contingency%20Plan%20Lender%20Cert_DSR%20Escrow.docx?web=1</a> Draft Emergency Letter_Contingency Plan Lender Cert_DSR Escrow 05 11 2020					
Correspondence Code	Originator	Concurrence	Concurrence	Concurrence	Concurrence
Name	W. Houston W.N.H. <b>WENDY HOUSTON</b> <small>Digitally signed by: WENDY HOUSTON            DN: CN = WENDY HOUSTON C = US O = U.S. Government OU = Department of Housing and Urban Development, Office of Housing            Date: 2020.05.13 10:16:25 -04'00'</small>	D. Wilderman/ DW <b>David Wilderman</b> <small>Digitally signed by: David Wilderman            DN: CN = David Wilderman email = david.b.wilderman@hud.gov C = US O = HUD OU = Office of Multifamily Housing            Date: 2020.05.13 12:57:45 -04'00'</small>	T. Bernaciak/ TB 		
Date	5/13/20	5/13/20	5/13/20		

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U.S. Department of Housing and Urban Development  
 Previous edition is obsolete.

form HUD-713.1 (02/03)