

Supporting Statement for Paperwork Reduction Act Submissions

Multifamily Accelerated Processing (MAP) Guide, 4430.G

OMB Control No.: 2502-0541

A. Justification

1. Circumstances that make the collection of information necessary.

Multifamily Accelerated Processing (MAP) Guide is designed to establish uniform national standards for Federal Housing Administration (FHA) approved lenders to prepare, process and submit loan applications for FHA multifamily mortgage insurance. The MAP Guide provides - in one volume with appendices – guidance for HUD staff, lenders, third party consultants, borrowers, and other industry participants. Topics include mortgage insurance program descriptions, borrower and lender eligibility requirements, application requirements, underwriting standards for all technical disciplines and construction loan administration requirements. The MAP Guide applies only to FHA multifamily mortgage insurance programs. Except to the extent lender monitoring or enforcement activities overlap, Section 232 and other programs administered by the Office of Healthcare Programs are not addressed by the MAP Guide.

The Guide has been updated to reflect various organizational, policy and processing changes implemented since the last edition was published in 2016. Examples include electronic submission of data in a standardized format, the consolidation of HUD Field Offices to Regional Centers and Satellite Offices, workload sharing, and a “risk-based” underwriting approach. The goal of MAP is to provide a consistent, expedited mortgage insurance application process at each HUD Multifamily Regional Center or Satellite Office. All MAP eligible projects must be submitted using MAP processing unless a waiver is granted to process under Traditional Application Processing (TAP). Such waiver approval authority is retained by HUD Headquarters’ Director of Multifamily Production. Additionally, two new chapters were added to this edition of the Guide: The Water and Energy Conservation chapter and the Closing Guide chapter.

Statutory authority for the implementation of MAP is contained in the basic insuring authority for each of the programs covered in the MAP Guide, e.g. National Housing Act, 12 U.S.C. §§ 220, 221(d)(4), 231, 241(a), 223(a)(7), and 223(f). Additionally, Section 211 of the National Housing Act and Section 7(d) of the Department of HUD Act authorize the Secretary to make such rules and regulations as may be necessary to carry out the provisions of the National Housing Act. The FHA requirements listed in HUD regulations covering each MAP eligible program are included and more fully explained in this MAP Guide

Chapter 2 of the MAP Guide covers the application process, approval requirements and requirements for a Quality Control Plan for FHA-approved lenders who desire to apply as a MAP-approved lender. The title of the chapter was revised to better describe the covered content: “Lender and Underwriter Qualifications and Requirements; Quality Control Plans; Identity of Interest and Conflict of Interest Revisions”.

The MAP program requires that lenders and underwriters be skilled in underwriting multifamily housing loans and in preparing applications for FHA multifamily mortgage insurance. To ensure that goal is met, MAP Lenders and MAP Underwriters must be approved by HUD’s Multifamily Asset and Counterparty Oversight Division (“MACOD”). Approval of a MAP Lender or Underwriter by MACOD is on a nationwide basis and the MAP Lender and its approved Underwriter may process MAP loans regardless of which HUD area office will review the MAP application. MAP approval does not expire, but by accepting the opportunity to participate in the MAP program, the MAP Lender and Underwriter agree that

their MAP loans will be subject to post-endorsement review by MACOD and that, if they fail to meet HUD standards for underwriting loans, their MAP designation may be terminated in accordance with the Quality Assurance and Enforcement Actions Chapter.

Approval by MACOD as a MAP Lender is a prerequisite to participation in the MAP program, but MAP approval does not obviate the need to have an experienced team process each application. The MAP Lender is responsible for ensuring that all third party contractors meet the requirements outlined in the MAP Guide, including the USPAP appraiser competency provision and jurisdictional certification requirements, and that third party contractors do not have any identity of interest with the Borrower/sponsor or any affiliated entity. If the HUD office has concerns regarding the MAP Lender's, its Underwriter's or its third-party contractor's past performance or capabilities, the office consults with MACOD for additional monitoring or for a potential enforcement action.

Two new chapters were added in this edition of the MAP Guide. They are the "*Water and Energy Conservation*" chapter and the "*Closing Guide*" chapter. The new "*Water and Energy Conservation*" chapter will address conservation of energy and water at multifamily properties, which reduces property operating costs and increases physical durability. Conservation is achieved by good design and engineering, superior products, careful construction, conscientious maintenance and property management practices, and incentives that change utility consumption behavior of tenants and employees. This chapter describes the minimum energy efficiency requirements for FHA-insured properties, available incentives for energy and water conservation and the requirements for obtaining these incentives.

The previous version of the 2016 FHA Closing Guidebook, 4300.G, is now a chapter in the revised MAP Guide as the "*Closing Guide*". The Closing Guide chapter will cover all the closing requirements and procedures for the Office of General Counsel Closing Attorneys in the field offices. This Chapter applies to all FHA-insured Multifamily loan closings authorized under the National Housing Act (12 USC 1701 *et. seq.*), whether processed through MAP or through TAP. This Chapter 19 supersedes and replaces the FHA Multifamily Program Closing Guide (last revised February 2015). The chapter is intended to provide procedures and protocols for MAP Lender, counsel for Lender's Counsel, Borrower, counsel to the Borrower, the assigned HUD Closing Attorney from the Office of General Counsel ("OGC"), the HUD Multifamily Regional Center Director, and other Multifamily Housing Production staff, to prepare, submit, and review closing packages and otherwise prepare for the closing of Multifamily loans; and to promote uniformity in the requirements and procedures for HUD-closings held nationwide.

Lastly, several HUD Forms are referenced throughout the MAP Guide. This collection uses the following Forms that are covered under other information collections listed below for the FHA multifamily mortgage insurance application process. These Forms used in the application process includes gathering, retention, recordkeeping, and reporting. The Department continues to work on instruments for the MAP Guide under other collections. Listed below are the Forms and their OMB Approval numbers:

- OMB Approval No. 2502-0001**- HUD 92417
- OMB Approval No. 2502-0005** - HUD 92001B
- OMB Approval No. 2502-0009** - HUD 11
- OMB Approval No. 2502-0010** - HUD 92457
- OMB Approval No. 2502-0011** - HUD 92437; HUD 92441; HUD 92442; HUD 92442A; HUD 2880
- OMB Approval No. 2502-0013** - HUD 935.2A
- OMB Approval No. 2502-0016** - HUD 92023
- OMB Approval No. 2502-0018** - HUD 92464
- OMB Approval No. 2502-0028** - HUD 92448
- OMB Approval No. 2502-0029** - HUD 2010; HUD-92013; HUD 92013 Supp; HUD 92264; HUD 92264T; HUD 92264A; HUD 92273; HUD 92274; HUD 92326; HUD 92329; HUD 92331; HUD 92415;

HUD 92447; HUD 92452; HUD 92485; HUD 2880; HUD 92466; HUD 92466R-1; HUD 92466 R-2; HUD 92466 R-3.

OMB Approval No. 2502-0044 - FHA 2205A; HUD 2328; HUD 92330A

OMB Approval No. 2502-0057 - HUD 3433; HUD 3434; HUD 3435

OMB Approval No. 2502-0097 - HUD 92403

OMB Approval No. 2502-0112 - HUD 92330

OMB Approval No. 2502-0118 - HUD 2530

OMB Approval No. 2502-0305 - HUD 9832; HUD 9839B; HUD 9839C

OMB Approval No. 2502-0468 - FHA 3259

OMB Approval No. 2502-0470 - HUD 2554; HUD 92476A

OMB Approval No. 2502-0505 - Capital Needs Assessment CNA e-Tool

OMB Approval No. 2502-0541 - Chapter 2 of the Guide - MAP Lender Approval

OMB Approval No. 2502-0598 - Multifamily Closing Document PRA collection

OMB Approval No. 2506-0202 - HUD Environmental Review Online System (HEROS)

OMB Approval No. 2060-0347 - Portfolio Manager (EPA) Related to energy usage and consumption characteristics

2. By whom, and for what purpose is the information to be used?

This MAP Guide outlines the basic instructions, requirements, and processing procedures for a multifamily rental project loan application from the pre-application phase of processing through firm commitment issuance, construction, cost certification and final endorsement, where applicable, for the approved MAP Lender, subject to a review by the Department. The Department places confidence in the lender's integrity and competence to prepare much of the documentation for a loan submission for mortgage insurance. The MAP Lender assumes the responsibility for underwriting the loan to include the preparation of narrative reports, gathering of data, collection of information, the review of reports and data prepared by licensed professionals (Appraisers, Architects, Cost Analysts, Underwriters, etc.), and the completion of applicable HUD Forms. The completed package is then submitted to the local HUD Multifamily Housing office for review by the Department for the possible issuance of a Firm Commitment.

Multifamily Housing is publishing the revised 2020 MAP Guide with a whole new look. The Guide is applied with a new numbering system and formatting to highlight headers that go into sub-subheading levels to five digits. An important feature of the Guide is an index of terms and glossary terms that are consistent, easy to understand the common terms and increases searchability within the document. Included is the renumbering of all pages. Another important feature is the enhancement of hyperlinking the table of contents. Hyperlinking was included in the 2016 version of the Guide; this improved feature will increase the ability to search and cross-reference information. Also see Section 15 about this future change.

Streamline Procedures

Approved MAP Lenders also can be approved to underwrite and submit mortgage insurance applications under streamline procedures. The *Housing and Economic Recovery Act of 2008(HERA)* required FHA to streamline mortgage insurance applications for projects with equity from the **Low-Income Housing Tax Credit (LIHTC) program**. HUD launched an accelerated approval process under the Section 221(d)(4) LIHTC Pilot program for new construction and substantial rehabilitation multi-family rental properties assisted with LIHTC. The Section 221(d)(4) LIHTC Pilot program provides permanent financing on transactions that are low risk, to allow FHA to significantly streamline the review process and create efficiencies without increasing risk. The streamlining procedures will permit low risk new construction and substantial rehabilitation applications (including preservation of federally assisted/Section 8, new LIHTC and re-syndications) to be reviewed within 30-60 days and closed within 90-120 days.

Reducing the time required to review and approve applications helps align FHA-insured financing with the LIHTC Program standards including the need to meet strict time deadlines. HUD can assist MAP Lenders to meet bond closing or other LIHTC performance deadlines that may result in forfeit of the credit allocation or bond reservation and may impair the borrower's ability to secure tax credits for future transactions. The Department has the potential to successfully cut the time it takes to approve these lower risk LIHTC projects and to dramatically increase the production of affordable rental projects nationwide.

Firm Commitment Extension Request

Firm Commitments are issued for a term of 60 calendar days by the HUD Field staff. The MAP Lender, on behalf of the borrower, will request an extension of the Commitment to prepare for the Initial Endorsement submission. The Regional Center Director (or their designee in accordance with delegated authority) may grant one or more extensions for up to a total of 120 calendar days from the original expiration date. To determine the number of extensions that occurred for this collection period [Fiscal Years 2017, 2018 and 2019] our pipeline data resulted in 1,504 Commitments that were extended at least one time.

Lender's Underwriter Narrative Report

The MAP program delegates due diligence and underwriting responsibility to MAP approved Underwriters and lenders. The MAP approved Underwriter is expected to be completely familiar with the contents of the MAP Guide, have demonstrated experience and mastery of commercial lending practices and real estate finance, and have a working knowledge of HUD regulatory and statutory authority. HUD retains commitment authority and responsibility for final determination of acceptable risk to the insurance fund, as well as certain technical and compliance responsibilities. This in no way relieves the MAP Lender from the responsibility of underwriting and programmatic compliance.

The basic function of a MAP approved Underwriter is to objectively evaluate factors in making a credit approval recommendation, for example: character, creditworthiness, competence, and capacity of the borrower and development team members; cash flow sufficient to service the proposed loan; collateral quality, including valuation, physical condition, environmental factors and location; compliance with HUD program and processing requirements. The Underwriter must identify all material risks and weaknesses, with appropriate mitigating factors including quantitative analysis and stress testing to identify the impact of "worst case" scenarios. If a transaction recommended by a lender is properly underwritten and processed, and is complete and technically compliant, HUD's role is to review the application and the lender can assume a timely determination.

If the application fails to identify material underwriting risks and mitigating factors, or has material processing or compliance deficiencies, HUD has the option to reject the application, re-underwrite it and approve with conditions, or return the application to the lender for modifications to address deficiencies.

Detailed Scope of Work Write-up

Existing properties undergoing substantial rehabilitation require a written due diligence summary description of the project prepared by MAP Lender's project architect and/or construction analyst. The Work Write-up outlines all the proposed construction work at the property and should address the findings from onsite inspections and other due diligence required to properly evaluate areas of deficiency and other necessary improvements. A preliminary draft of a Write-up is used to develop the detailed plans and specifications (construction documents) by the architect. The final Scope of Work Write-up should accurately outline all the construction activities illustrated in the architect's final set of construction documents ensuring that the property's identified rehabilitation needs are fully addressed.

Market Studies

The purpose of the market study is to assure that there is enough sustainable demand for additional units without adversely impacting the existing supply, to maintain a balanced overall market. The focus of the market study is on the overall demand within a defined market area, and of the proposed project's ability to capture and sustain a share of the total or incremental demand.

Closing Guidance

The Closing Chapter procedures and guidance will pertain to all MAP Guide closing types: initial closing (new construction/substantial rehabilitation) and initial/final closing (refinancing). All documents are submitted one-time for initial closing and initial/final closing to HUD electronically (via e-mail exchange) and by hard copy.

The recent changes in the closing guidance occur in various areas of the HUD review such as: lender response to closing introduction letters submitted to HUD via email to announce the lenders closing dates and timelines for closings based on HUD's review protocols and external deadlines to facilitate a smoother and shorter closing process; loan assignment documents that memorialize FHA-insured loan assignment from one lender to another lender; and explanation of efforts made to resolve disputes to close a loan without a participating general contractor. The Closing Chapter will disclose the Form name and number for all documents, agreements, riders, and certifications currently approved under the Multifamily Closing Document PRA collection 2502-0598. Any new documents created because of future revisions HUD will document in the collection's next renewal in 2021.

In preparation for closings, HUD requires the borrower to disclose any additional agreements affecting the project or the loan. The information and documents are required as HUD must review and consider all documents that could impact the project to the detriment of HUD, particularly since borrowers are by regulation prohibited from being engaged in business activities other than the FHA-insured multifamily rental project. This information is needed as a matter of due diligence for the protection of the FHA insurance funds. Documents are required to be submitted for all closing types on an as needed/as applicable basis.

What follows are recent changes in closing guidance on various areas such as letters, documentation and agreements submitted in closing packages by MAP Lenders for the following stakeholders types: borrower, borrower's counsel, lender's counsel, surety, and borrower's counsel and title agent.

Lender Response to Closing Introduction Letter. Prepared and submitted by the lender to HUD via email; includes lender's preferred closing date, anticipated timeline for closing based on HUD's document review protocols, and external deadlines (e.g., tax credit deadlines). The information is needed to facilitate a smoother and shorter closing process after HUD's issuance of the firm commitment by establishing the parties' timing needs and expectations. Submitted one time for all closing types: initial closing (new construction/sub-rehab) and initial/final closing (refinance).

Loan Assignment Documents. Prepared by lender's and borrower's counsel, delivered by the lender to HUD; includes documents memorializing the assignment of a HUD-insured loan between initial and final closing from one lender to another lender; the information is required for HUD to exercise its lender oversight authority and responsibility under the National Housing Act and the contract of mortgage insurance, a process that HUD has always undertaken but is now being formalized in the MAP Guide for consistency (and greater efficiency) across the country. Submitted one time for new construction/sub-rehab project loans, but only when the loan is assigned to a different lender between initial and final closing.

Lender Explanation Concerning Dispute between Borrower and General Contractor. Prepared and submitted by lenders to HUD; includes explanation of efforts made to resolve dispute before submitting

request to close without participation of general contractor, including notification to third parties. In the normal course HUD requires the participation of general contractors in the closing process to ensure its first lien mortgage status and statutory compliance with cost certification and maximum mortgage amount. HUD requires an explanation of good faith efforts to resolve construction disputes to minimize the number of closing without the general contractor. Submitted one time for new construction/sub-rehab project loans but only in construction dispute situations.

Dispute Resolution Agreement Prepared by lender's counsel, surety, and borrower's counsel, and submitted by lender to HUD; includes information and terms agreed to by concerned parties to proceed with loan closing in the presence of construction dispute, including escrow of funds to be disbursed upon resolution of dispute. Information and agreement are needed to ensure parties are properly paid to avoid filing of liens and to ensure statutory cost certification compliance. Such information has typically been collected in the past but not officially formalized for PRA purposes until the present. Submitted one time before final closing for new construction/sub-rehab project loans but only in construction dispute situations.

Additional Agreements. Requires borrower to disclose any additional agreements affecting the project or the loan. Examples are given. The information and documents are required as HUD must review and consider all documents that could impact the project to the detriment of HUD, particularly since borrowers are by regulation prohibited from being engaged in business activities other than the HUD-insured multifamily rental project. This information is needed as a matter of due diligence for the protection of the FHA insurance funds. Documents are required to be submitted for all closing types on an as needed/as applicable basis.

Lender's Current Payment Letter and Certification. Prepared and submitted by lenders to HUD at final closing, to verify that the loan is current and there is no loan default, and to provide any required confirmations from the Lender's Certificate (HUD-92434M) that Lender could not make at initial closing. Submitted one time at final closing for new construction/sub-rehab transactions. This document is currently approved under the Multifamily Closing Document PRA collection 2502-0598.

Standard Practice Forms

Drawings & Specifications

The MAP Lender will provide drawings and specifications (construction documents) completed by the project architect for each new construction or substantial rehabilitation eligible under the Section of the Act. The lender must hire a qualified construction analyst(s) with experience in multifamily construction to review the drawings and specifications prepared by the project architect and any related agreements for design and/or construction services for compliance with the MAP Guide requirements. The construction documents must conform with local building standards and construction methods, relevant national or international building codes and standards for each design category such as Architectural, Civil, Structural, Mechanical, Electrical, Plumbing etc. The site survey drawings must be completed by a qualified surveyor and conform to the ALTA/ACSM Land Title Survey ALTA/NSPS Minimum Standard Detail Requirements. A completed form HUD-91073M Surveyor's Report must be attached. A complete set of drawings and specifications are submitted with each application.

The American Institute of Architects (AIA) Standard Forms of Agreements and HUD Amendments

The form of contract required between the owner, project architect, and general contractor when employed for the MAP Guide transactions must be the AIA Standard Forms of Agreements. These forms are widely used by the industry for construction projects. For new construction and substantial rehabilitation projects that involve extensive construction activities, the required AIA forms are B108

(between the architect and the owner) and A201 (general conditions). The form HUD-92408-M (current collection 2502-0589) specifies further HUD requirements and must be attached to B108.

Appraisers & Market Analyst

MAP Lenders are responsible for the selection and approval of appraisers and market analysts who are familiar with MAP guidelines. A lender will locate a Certified General Appraiser from the Appraisal Subcommittee of the Federal Financial Institutions Examination Council (FFIEC). The FFIEC maintains a national registry of Certified General Appraisers who are authorized, under Federal law, to perform appraisals in connection with federally related transactions. The appraiser or the market analyst must be independent of and may not be affiliated with the loan originator, broker, developer, borrower, MAP Lender or any individual or institution involved in any other financial role in the application. Lenders must ensure that each appraiser and market analyst selected are qualified to appraise or perform market analyses, respectively, for multifamily properties. The lenders will perform their due diligence by reviewing their education, quality, and frequency of multifamily appraisal experience, sample appraisals and market studies, professional affiliations, and state licenses or certifications. The appraiser is required to complete and sign various HUD forms related to the appraisal, i.e. Forms HUD-92264, -92273, -92274 (current collection 2502-0029) etc.

Appraisals

Appraisals that are received by MAP Lenders must be maintained according to the Department's record keeping rules. These rules do not mandate that an appraiser have possession of assignment work-files. The Department does not permit permanent personal possession of records relating to a review appraiser's work. The Department retains these records for far more than the time required under USPAP and will, with due process of law, cooperate with appraiser regulatory agencies, professional peer review committees, and assisting individuals in obtaining a professional designation. Appraiser work-files will be maintained in the local HUD office and records should be stored on the local or regional network drive. Paper records should be scanned as needed.

By statute, appraisals submitted in support of an application for HUD mortgage insurance must comply with the Uniform Standards of Professional Appraisal Practice (USPAP).

Capital Needs Assessment (CNA)

Applications for projects to be insured under MAP loan programs require a Capital Needs Assessment (CNA). A CNA is a due diligence report describing the physical inventory of a multifamily property and characterizing the condition and expected durability of that inventory for budgeting for identified repairs and future capital replacements. A CNA includes a financial plan or annual schedule of anticipated capital costs and corresponding funding needed to meet expected costs.

When prepared for an existing property a CNA requires an on-site physical inspection. It is the primary means of identifying immediate physical needs or deficiencies and specifying the work, location and expected cost of the repairs, replacements and/or alterations required to address immediate needs of the property. CNAs of existing buildings must at a minimum meet the requirements of the industry common standard ASTM E 2018-08 for the preparation of needs assessments. When prepared for a property to-be-built as new construction or undergoing substantial rehabilitation, a CNA is only an inventory of the physical composition of the property (e.g. buildings, units, components, quantities) and an estimate of the expected durability of the various components with a corresponding plan to finance future capital needs as they are expected to occur.

These CNAs may be prepared by, or under the supervision of, the borrower's project architect or the lender's needs assessor or construction analyst. The MAP Lender will submit the CNA in the loan application for FHA-insured mortgage to the local HUD Offices, and the HUD Branch Chief, Underwriter and Construction Analyst, will review the CNA. All CNAs must be submitted to HUD using the HUD's proprietary online application called CNA e-Tool. CNAs and the CNA e-Tool are covered by

a separate PRA submission with OMB Approval Number 2502-0505. This separate treatment is because CNAs are used for other multifamily purposes apart from insured mortgage applications pursuant to the MAP Guide.

Green Building Certifications

Certifications may be obtained by borrowers and provided to HUD through lenders in order to qualify an insured mortgage for a Green MIP Rate consistent with Federal Register, 81 FR, page 18473 (“MIP Notice”), Section D as detailed in a new, Chapter 6 of the MAP Guide. HUD’s MIP Notice recognized multiple national standards applicable to varying circumstances (i.e., new construction, rehabilitation, remodeling, etc.) While varying in detail, each recognized certification program establishes a standard practice for evaluating building energy performance and calibrating a level of superior performance that merits the certification and thus the Green MIP rate. Borrowers may choose to qualify for the Green MIP rate by selecting and obtaining one of the recognized certifications. For new construction and most substantial rehabilitation proposals, the proposed design must achieve an estimated building performance that is superior to existing base building codes, typically by 15%. For existing buildings, borrowers must propose repairs and alterations that will improve benchmarked existing building performance, also typically by 15%. Recognized certifications obtained prior to but within 15 years of application for a Green MIP loan are accepted. Owners of existing properties seeking a certification as an element of their loan application must use an industry standard procedure for benchmarking which is a software application known as Portfolio Manager, a free service provided by the U.S. Environmental Protection Agency. In addition, they must inform the design of repairs and alterations by conducting an energy audit consistent with the national standard practice for such audits published by the American Society of Heating, Refrigeration and Air Conditioning Engineers (ASHRAE). It is the borrower’s choice to apply for a Green MIP rate and if the borrower exercises this option, the certifications and qualifying measures are standard practices HUD has identified as best suited to provide this Green MIP option for multifamily insured mortgage programs.

The borrower’s intent to seek a Green MIP rate and its selection of a Green Building Certification are memorialized on the form HUD-92013D and the borrower’s ongoing building performance commitments are described in the Regulatory Agreement Rider 5 which is form HUD-92466 R-5. Both these forms are covered by OMB approval number 2502-0029.

Third Party Professionals

MAP Lenders are expected and authorized to hire third party contractors for appraisal, architecture and cost, market analysis, environmental reports and environmental site assessments, and specialized reports related to any of these technical disciplines. The duties and responsibilities of the MAP Underwriter, associated with MAP application underwriting, are to engage all third-party consultants and analysts, provide oversight and effective supervision of work performed under their contracts to ensure their deliverables meet MAP Guide requirements and support the underwriting recommendation. Third party professionals include: appraisers, market analyst, architect, construction analyst, capital needs assessor, energy professional, and environmentalist.

Construction Analysts should be either a licensed or registered architect or physical engineer and must, at a minimum, have a degree (BS or BA) in architecture, civil or structural engineering or construction with five years of experience in design, construction, or development of multifamily buildings. A qualified construction analyst needs to review the drawings and specifications prepared by the project architect and any related agreements for design and/or construction services. The analyst must be knowledgeable and experienced with local building standards and construction methods, relevant national or international building codes and standards (e.g., International Existing Building Code, International Energy Conservation Code) and specific statutory or regulatory requirements for multifamily housing (e.g., Federal Fair Housing Accessibility Guidelines and the Uniform Federal Accessibility Standards). In all

cases the lender must ensure that the work experience of the construction analyst is consistent with the scale, scope, materials, methods, and technologies proposed for or existing at the property.

The Construction Analysts must evaluate: site, conditions based on inspection; the design of proposed and/or existing buildings; construction materials, methods and technologies ; the development team's experience and capacity; agreements and contracts between the owner and the development team; construction documents (i.e., drawings and specifications), cost and schedule for accuracy, feasibility and conformance with HUD's design and energy efficiency requirements; and, other relevant MAP Guide requirements.

The Needs Assessor selected by the MAP Lender must have education, professional credentials, and field experience appropriate to the assignment considering the age, size, type of building systems, construction methods, and location of the property. The needs assessor and any related consultants employed to prepare the capital needs assessment (CNA) must meet the qualifications described in ASTM E 2018-08 Appendix XI.1. The needs assessor must have no identity-of-interest with the lender or the borrower or its principals and may not have any personal or business relationship with the borrower, or its principals that would create a conflict of interest.

Energy Professionals must be engaged by the borrower for all applications requesting a green mortgage insurance premium rate ("Green MIP") as published in the Federal Register, 81 FR, page 18473 ("MIP Notice"), Section D, and/or underwriting of reduced operating expenses to be achieved with specified energy efficiency utility repairs and alternations. The energy professional's primary tasks include: benchmarking energy consumption at the property; managing EPA's Portfolio Manager® online application for annual reporting; conducting site inspections and energy audits; using energy modeling to estimate energy use data; and assisting the owner and owner's development team to obtain a recognized green building certification. Energy professionals must be persons with not less than three years work experience evaluating utility consumption in multifamily buildings and employing energy modeling and benchmarking software, including specifically EPA's Portfolio Manager® and related ENERGY STAR® resources and products. Energy professionals must have professional certifications or credentials appropriate for analyzing multifamily properties and must remain current with new energy monitoring, measurement methods, and technologies. Appropriate professional certifications or credentials including one or more of the following:

1. Registered architect or licensed professional engineer (PE) with requisite energy experiences;
2. American Energy Engineers Association's Certified Energy Manager (CEM) or Certified Energy Auditor (CEA) designations;
3. American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) High Performance Building Design Professional (HPBDP) designation;
4. Building Performance Institute (BPI) Multifamily Building Analyst (MFBA) designation;
5. Residential Energy Services Network (RESNET) Home Energy Rating System (HERS) Rater.

Environmental Professionals. All applications for insured mortgages must submit an environmental review using the HUD Environmental Review Online System (HEROS) in order to comply with the National Environmental Policy Act of 1969 (42 U.S.C 4321 et seq.) (NEPA), HUD regulations implementing NEPA at 24 CFR Part 50 including related Federal Laws and Authorities at 24 CFR 50.4 and 50.3(i), and specific MAP environmental requirements. The MAP Lender will generally select the environmental professionals and must verify that the professionals used are qualified for their assigned responsibilities. Professionals preparing Phase I and Phase II Environmental Site Assessments must meet the qualification requirements in the latest versions of ASTM E1527 and E1903, respectively. Professionals may be required to evaluate technical areas, such as lead-based paint, asbestos, radon, noise, wetlands, flooding, endangered species, historic preservation, soil stability conditions, engineered fall distances, pipeline hazards, or other areas. These professionals must meet the license and certification standards laid out in MAP Guide Chapter 9 Section 9.6.

Most of the environmental review is covered by the PRA for HEROS (OMB Approval No. 2506-0202 – HUD Environmental Review Online System). The Lead Based Paint requirements stem from the regulations at 24 CFR Part 35. The Radon and Asbestos requirements follow national standards (ANSI-AARST for radon and ASTM for Asbestos.)

The MAP Guide does create a new pathway for State Historic Preservation Office (SHPO) Section 106 consultations by creating a delegation that will allow lenders to consult directly with a SHPO. The 2016 version of the MAP Guide encourages projects to hire qualified professionals; the 2020 updates will require projects to hire qualified professionals in certain circumstances if they want to use the delegation. Complying with Section 106 is covered by the PRA for HEROS.

Other Technical Specialists engaged by the borrower, the project architect, or the MAP Lender to prepare or review of architectural plans and specifications may include mechanical, structural, sanitary, geotechnical or civil engineers. When engaged for services, a principal of the technical specialist firm must be a licensed or registered professional and must affix and sign relevant professional seal(s) on any deliverable resulting reports or official opinions.

Certifications by Third Party Professionals

By statute, appraisals submitted in support of an application for HUD mortgage insurance must comply with the Uniform Standards of Professional Appraisal Practice (USPAP). USPAP requires a certification and specifies the content of the certification. We require this additional certification because our appraisals must be prepared in compliance with fair housing and anti-discrimination laws.

Other Certifications – To reduce the number of exhibits submitted in loan closing packages and to reduce HUD staff review, HUD created the Consolidated Certification – Borrower, Form HUD-91070M (current collection 2502-0598) to capture in one document one signature of the borrower. Previously HUD required separate written statements and three documents requesting the borrower to execute its compliance with National Housing Act provisions, compliance with fair housing and civil rights acts, equal employment opportunity, consent to release credit information, participation in the low-income housing tax credit program, disclosure of any identity of interest, and disclosure of no lobbying. The form contains seven (7) certifications requiring one signature.

HUD Inspector

The HUD Inspector is an independent third party contracted by HUD to monitor construction, renovation, and repairs of multifamily housing projects with FHA-insured loans as insurance of advances and insured upon completion. HUD will select qualified inspectors with at least six (6) years of relevant experience. Hired inspectors may be a Design Representative, a Construction Representative, or an individual or group/firm. The inspector's experience must clearly demonstrate knowledge and familiarity with construction, construction inspection, and construction administration. The experience must also demonstrate knowledge of national building codes and standards, current standard construction methods and procedures, Federal Fair Housing Accessibility Guidelines, and HUD regulations and handbook requirements to ensure compliance by the owner, builder, and the supervisory architect.

Inspections are the periodic site observations made to protect HUD's interests and cover all activities and phases of a construction project. The inspections ensure the quality of work done at the property to bring the multifamily housing project to a decent, safe, and sanitary condition in accordance with 24 CFR Part 5, Subpart G. In addition to inspecting the progress being made under the construction contract, inspectors also investigate complaints HUD may receive concerning the property's physical condition and other construction related issues.

The HUD Inspector will conduct a pre-construction conference at initial endorsement. To perform its inspection HUD will furnish to the inspector copies of construction documents, which include:

Construction Contract HUD-92442M; a set of drawings and specifications on-site and off-site improvements; AIA Standard Forms for contracts; and Form HUD-2328 Contractor's and/or Mortgagor's Cost Breakdown (current collection 2502-0044). The inspector's site observations are recorded on the HUD Representative's Trip Report, Form HUD-95379 (current collection 2502-0029). The frequency of site inspections varies based on the program and construction type.

Closing Chapter. There are instances when a closing will require the collection of standard industry practice type documents that are submitted by the lender. The Closing Chapter collects these documents in these three areas:

Workout Information and Documentation. Prepared by lender's counsel and submitted by lender to HUD; includes non-standardized information provided by third parties (e.g., surety company), certification of compliance with HUD requirements, and workout agreement. Information is needed to gain cooperation and participation of third parties for projects experiencing significant problems during construction to ensure project completion and final loan closing in order to avoid a mortgage insurance claim. This documentation is standard industry practice which HUD has historically collected in workout situations in the past, but not until the present has it been formalized for PRA purposes. Submitted one time before final closing for new construction/sub-rehab project loans but only in construction dispute situations.

Title Agent Letter of Authority and Closing Protection Letter. These are industry standard requirements for closing commercial real estate transactions. Prepared by the title agent and policy issuing title company; submitted by lenders. The letter of authority demonstrates the agent has the authority to issue the Title Policy on behalf of the title company for the project identified in the letter and must be valid as of the date of closing. It is collected as a matter of due diligence for the protection of the Department and the insurance funds in the event of a title company attempts to disavow a policy issued by one of its agents. The letter of authority is submitted for all closing types (new construction/sub-rehab and refinance) when a title agent issues the title policy instead of the actual title company providing the title insurance.

The closing protection letter is typically provided on an industry (ALTA) form; it ensures that the title agent, approved attorney, or other third party escrow agent is authorized to perform the escrow services on behalf of the title company, and to indemnify the Lender for actual losses caused by certain misconduct of the closing agent (subject to specific exceptions and exclusions therein). The closing protection letter is submitted one time for all closing types: initial closing (new construction/sub-rehab) and initial/final closing (refinance).

UCC Searches. These documents are non-HUD forms that HUD requires lenders to provide to establish that there have been no liens filed against the borrower's personality under Uniform Commercial Code for the protection of lender and HUD. They are standard industry documents that conventional lenders require in addition to HUD. Submitted one time for all closing types: initial closing (new construction/sub-rehab) and initial/final closing (refinance).

1. Use of technical collection techniques to reduce burden.

All Forms (with OMB Clearance numbers) are available on the Department's website. In the past the Office of Housing Multifamily Production (OHMP) did not receive these forms electronically for submission of a complete application package for mortgage insurance. Some of the forms are in PDF format, PDF Fillable or can be scanned and sent by electronic mail. This collection of information does not involve the use of an automated system for the preparation and submission of

complete application packages for mortgage insurance. The Department and OHMP are undergoing a transformation of our IT infrastructure, which will dictate the new development of an automated application system. The Office of OHMP has communicated that it is imperative that the automated system developed adequately address concerns for confidentiality (due to the nature of data reporting) and the need and ability to capture electronic signatures. Until the IT transformation has time to materialize, OHMP has established a viable electronic loan application intake process that is sustainable by a disc or removeable drive, which use commonly available software and industry standard operating systems and formats.

UPDATE: HUD is currently developing an online portal that will soon be used for electronic submissions of applications and other documents to HUD. A Mortgagee Letter with details and revised application submission instructions will be issued when the portal is ready for implementation. Until then, the instructions in Appendix 4 should be followed. Multifamily will develop a separate PRA before this comes online.

As part of an effort begun in 2010 to align Federal rental housing policies and procedures, HUD and the U.S. Department of Agriculture (USDA) Rural Housing Service developed an automated process for preparation, submission, and review of CNAs. The standardized data entry, automated basic data validation and data submission to HUD for review all occur using a web-based application called CNA e-Tool. The new and improved cloud-technology based version of the CNA e-Tool is currently under development and will be completed in 2020 to further reduce burden. Technical information, instructions on how to access and use the CNA e-Tool, and related information is available at HUD's CNA e-Tool home page.

HUD will also require that all environmental reports prepared for HUD FHA-insured multifamily properties be prepared, submitted, and reviewed using HUD's Environmental Review Online System (HEROS).

2. Identify duplication.

Each loan application prepared by the MAP Lender is unique. Because development and construction cost vary and are specific to each project, general or modified information is not acceptable. The Department will allow Lender prepared and formatted exhibits as a substitute to obtain the required information for mortgage insurance, provided the document or HUD Form has the approved OMB approval collection number, date and form number ascribed on it.

3. Impact of small organizations.

The Department minimizes the burden on small businesses by requiring the collection of information only once at or before Initial Endorsement.

4. Consequences of collection not conducted or conducted less frequent.

The collection of information occurs only once for any loan application submitted for a mortgage insurance under a multifamily housing program eligible for MAP processing; and one application submission for the MAP approval of a Lender. If this collection were not conducted the Department could not comply with the provisions of the law and Federal Regulations; loans would not receive mortgage insurance.

5. Explain any special circumstances that require the collection to be conducted in a manner:

Requiring respondents to report information to the agency more than quarterly - There is no special circumstance for reporting more than quarterly. As a matter of procedure one loan application is submitted one time in a year, for a project, for mortgage insurance for the first time or a refinanced of mortgage insurance;

Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it – HUD and MAP Lenders have a mutual interest in ensuring consistent lender competence and compliance with the MAP Guide and other relevant guidance and handbooks. If in the process of performing this work, the lender places HUD at un-due risk, HUD will issue a Warning Letter or sanction the lender. The MAP Lender may, within 10 business days of receiving a sanction letter, request in writing, an appeal conference before the appeals official;

Requiring respondents to submit more than an original and two copies of any document - There is no special circumstance. A complete MAP application submitted for mortgage insurance includes one original, one additional hard copy and one electronic copy. One hard copy and an electronic version is submitted for Lender's application to become an approved MAP lender;

Requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years - There is no special circumstance, the Department does not provide procedures for respondents to retain records;

In connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study – There is no special circumstance, a statistical survey does not exist in this collection;

Requiring the use of a statistical data classification that has not been reviewed and approved by OMB - There is no special circumstance, a statistical survey does not exist in this collection;

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 special circumstance that includes a pledge of confidentiality in this collection; or

Requiring respondents to submit proprietary trade secret, 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 special circumstance that require respondents to submit proprietary trade secret, or other confidential information in this collection

6. Federal Register/

In accordance with 5CFR 1320.8(d), this information collection soliciting public comments was announced in the Federal Register on **Thursday, July 2, 2020**, Volume **85**, No. **128**, Pages **39928 - 39929**. **FR-7027-N-22**.

HUD received comments from seven respondents and an aggregate total of 96 new comments. No comments pertained to cost or burden hours and thus action to address the comments was unnecessary. Respondent D is identified as the Green Building Initiative and submitted a comment both directly and through a Congressional liaison. HUD directed a response to the respondent and copied each named member of Congress. The comment and pertained to recognition of an industry certification for energy conservation (i.e. no connection to cost or hour burden). HUD characterizes the other 95 comments received as typographical or editing suggestions, process improvement requests, and clarifications of technical mortgage finance terms or practices. A summary of public comments received by respondent is show in the table below:

Respondent	Cost or Hour Burden	Comments	Other Comments	Total Comments
A. Greystone	0		6	6*
B. Dominion Due Diligence Group	0		21	21
C. Harper Capital Partners, LLC	0		8	8
D. Green Building Initiative	0		1	1
E. Merchants Capital	0		38	38
F. American Asso. of Radon Scientists and Technologists	0		9	9
G. Dominion Due Diligence Group	0		13	13
Totals	0		96	96

* Respondent A submitted 182 comments, however, all but 6 were previously received during HUD's industry drafting table feedback. The majority of this respondent's comments were spelling, and grammar related.

7. Payment of gifts.

No gifts or payments, other than remuneration to contractors, are provided to respondents.

8. Confidentiality. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The Privacy Act of 1974 provides an assurance of confidentiality to the respondents. This is protected under The Privacy Act of Freedom of Information ACT (FOIA) of 1974, 5 U.S.C. § 552a.

9. Sensitive questions. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature apply in this collection.

12. Estimates of the hour burden and costs for collection of information:

Information Collection	*Number of Respondents	**Frequency of Response	Total Annual Responses	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Total Annual Cost
Loan Applications Submitted¹							
Firm Commitment Extension Requests ²	86	1.0	86	1.00	86	\$35.06	\$3,015
Lenders Narrative Report (includes non - form Certifications) ¹	86	1.0	86	10.00	860	\$48.45	\$41,667
Sub Total	86		172		946		\$44,682

Items Submitted in Loan Applications for NC/SR³							
Detailed Work Write-Up	86	1.0	86	100.00	8,600	\$75.77	\$651,622
<i>Sub Total</i>	<i>86</i>		<i>258</i>		<i>8,600</i>		<i>\$696,304</i>
Applications Submitted for Refinance or Purchase¹	86	1.0	86	10.00	860	\$35.06	\$30,152
<i>Sub Total</i>	<i>86</i>		<i>344</i>	<i>121</i>	<i>860</i>		<i>\$30,152</i>
Standard Practice Forms Submitted in Loan Applications for NC/SR^{3,4}	Burden Hour figures for Standard Practice Forms shown in following rows are excluded from Collection Total						
Appraisal	86	1.0	86	120.00	10,320	\$50.71	\$523,327
Capital Needs Assessment e-Tool	2502-0505						
Certifications	86	1.0	86	0.50	43	\$35.06	\$1,508
Closing Documents [Workout Information, Title Agent Authority, UCC] ⁷	86	1	86	100.00	8,600	\$45.00	\$387,000
Drawings, Specifications, & Amendment AIA-A201 or A104	86	1.0	86	100.00	8,600	\$120.00	\$1,032,000
Drawings, Specifications, & Amendment AIA-B108 or B104	86	1.0	86	16.00	1,376	\$120.00	\$165,120
Environmental - HEROS	2506-0202						
EPA's Portfolio Manager® (Energy Audits)	2060-0347						
Green Building Certifications	2060-0347						
HUD Inspectors	86	2.0	172	8.00	1,376	\$54.51	\$75,006
Market Study	86	1.0	86	51.00	4,386	\$67.99	\$298,204
Third Party Professionals ^{5,6}	86	1.0	86	85.00	7,310	\$75.77	\$553,879
Standard Practice Applications Submitted for Refinance or Purchase	0	0	0	0	0	0	\$0
No Total Burden	0		0		0		\$0
Collection Total	86		1,118		10,406		\$726,456

* The total number of respondents (86) was calculated using a three-year average and represents the number of MAP approved Lenders that are authorized to submit loan applications for FHA insurance for multifamily projects. The former number of respondents was 95. The decrease is attributable to mergers among approved firms and HUD's removal of inactive lenders. The average hours per response is 30 hours [121 hrs / 4* = 30.25]. *See explanation for number 1 and 3 below.

1) The total number of loan applications submitted (874) in calendar year 2019 that resulted in an executed Firm Commitment is 644 projects; this is a decrease of 230 loan applications. The total number of Commitments is broken out as 240 new

construction/substantial rehabilitation (NC/SR) and 404 refinance/acquisition applications. This is a decrease on NC/SR applications since 2016 due to a wide variety of factors, including interest rate volatility, program mix (i.e. Sections 223(f) and 223(a)(7)), and economic conditions.

2) DAP data research for executed Firm Commitments with approved extensions in calendar year 2019, is 501 projects. To determine the frequency of responses for 98 projects, we took an average of the total number of project DAP data (501) and divided that number by 644 (total projects with executed Firm Commitment) results in approximately, on average, a frequency of responses of 1.0.

3) Items submitted in new construction, substantial rehabilitation applications only: 240 loans, which include five (5) Section 241(a) loans.

4) The number of drawings, specifications and Amendment AIA-B108 exhibits submitted for NC/SR was 240 in calendar year 2019. Changes in this figure vary over time and reflect loan types sought by property owners, such as refinancing or acquiring properties under the Section 223(f) or 223(a)(7) Programs.

5) Third party professionals' burden hours, 85, represent an aggregate of the five (5) burden hours for each exhibit listed under the applications for NC/SR and standard practice forms.

6) The hourly cost per response for third party professionals is estimated as an aggregate of the hourly cost for the five (5) exhibits listed under the applications for NC/SR and standard practice forms [$\$376 / 5 = \75].

7) The MAP Lender will submit a closing package one time for initial closing (new construction/ substantial rehabilitation) and existing closing (refinance). The estimated hourly cost for a title agent to prepare, collect and review is \$45. The burden hours is 100. The burden hours for the Closing documents collection is 2502-0598.

13. Total annual cost burden to respondents.

There are no additional costs to respondents.

14. Cost to the Federal Government For HUD MAP Review:

Information Collection	Total Annual Responses	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Total Annual Cost
Loan Applications Submitted					
Firm Commitment Extension Requests	86	1.00	86	\$41.66	\$3,583
Lenders Narrative Report	86	10.00	860	\$41.66	\$35,828
<i>Sub Total</i>	<i>172</i>		<i>946</i>		<i>\$39,411</i>
Items Submitted in Loan Applications for NC/SR					
Detailed Work Write-Up	86	100.00	8,600	\$41.66	\$358,276
<i>Sub Total</i>	<i>258</i>		<i>9,546</i>		<i>\$358,276</i>
Applications Submitted for Refinance or Purchase	86	8.00	688	\$41.66	\$28,662
<i>Sub Total</i>	<i>430</i>		<i>10,234</i>		<i>\$28,662</i>
Standard Practice Forms Submitted in Loan Applications for NC/SR					
Appraisal	86	56.00	4,816	\$41.66	\$200,635
Capital Needs Assessment e-Tool	86	54.00	4,644	\$41.66	\$193,469
Certifications	86	0.50	43	\$41.66	\$1,791
Closing Documents [Workout Information, Title Agent Authority, UCC]	86	100.00	8,600	\$41.66	\$358,276
Drawings, Specifications, & Amendment AIA-A201 or A104	86	56.00	4,816	\$41.66	\$200,635
No HUD Review of Drawings, Specifications, & Amendment AIA-B108 or B104	86	0	0	0	0
Environmental - HEROS	86	0.50	43	\$41.66	\$1,791
No HUD Review of EPA's Portfolio Manager® (Energy Audits)	86	0	0	0	0
Green Building Certifications	86	0.50	43	\$41.66	\$1,791
HUD Inspectors	86	5.00	430	\$41.66	\$17,914
Market Study	86	51.00	4,386	\$41.66	\$182,721
Third Party Professionals ⁸	86	0	0	\$41.66	\$0
Standard Practice Applications Submitted for Refinance or Purchase	86	10	860	\$41.66	\$35,828
<i>Sub Total</i>	<i>1,118</i>		<i>28,681</i>		<i>\$1,194,851</i>

Collection Total	1,118		49,407		\$1,621,200
-------------------------	--------------	--	---------------	--	--------------------

8) MAP Lenders and property owner will hire third party professionals. HUD staff will not be reviewing applicants.

Hourly cost is based on a GS-12/5 Federal salary for the current year. The burden hours are substantially reduced as HUD only performs a review of the actual MAP application package and does not gather the actual data.

The following industry partners assisted the Department with providing estimated number of hours to perform to completion a loan application, Standard Practice Forms, and the hourly salary of the individual completing documents:

FHA Chief Underwriter Forum

Walker Dunlap
300 East Lombard Street
Baltimore, MD 21202
Ken Buchanan - (410) 500-4302
KBuchanan@walkerdunlop.com

PGMI Real Estate Finance
Investment Operations, Closing Manager
Columbus, Ohio
Tiffany Baymiller (614) 401-7701
tiffany.baymiller@pgmi.com

AGM Financial
20 South Charles Street
Baltimore, MD 21202
Troy D. Brown – (443) 573-2043
tbrown@agmfinancial.com

Jones Lang LaSalle Multifamily, LLC
2177 Youngman Avenue
St. Paul, MN 55116
Kurt Dayton – (763) 656-4566
kurt.dayton@am.jll.com

Trade Association

Mortgage Bankers Association
Associate VP | Commercial/Multifamily Grp
1919 M Street NW, WDC 20036
Sharon Walker- (202) 557-2747
swalker@mba.org

Multifamily Lenders Council

Reno & Cavanaugh PLLC
10320 Little Patuxent Parkway
Columbia, MD 21044
Gillian N. Rudow- (202) 349-2692
grudow@renocavanaugh.com

National Association of Home Builders
1201 15th Street, NW
Washington, DC 20005
Michelle Kitchen – (202) 266-8352
MKitchen@nahb.org

Center for Radon & Air Toxics
Indoor Environments Division, U.S. EPA
Katrin Kral – (202) 343-9454
Kral.katrin@epa.gov

15. This is a revision of a currently approved collection for the approval of the MAP Lender requirements. There are no changes to the way the program is administered. However, this collection reports a reduction in the burden hours from the previous collection. This collection requests 10,406 burden hours, the previous collection burden hours were 52,107.50, which is a difference of (41,701.50). Department implemented the follow factors to improve efficiency in lender approval

and loan underwriting approval process to reduce the burden hours in this collection by: risk mitigation in underwriting requirements, standardization of processing procedures and forms, and the elimination of duplication in procedures, and forms. In addition to these existing mitigations, per our HUD Departmental guidance we were informed that we were to only list the burden numbers for “Standard Practice” items and not to include these numbers in Number 12’s matrix. HUD had previously counted the burden hours of the “Standard Practice” items the same as the submission of forms and documents. These are forms and documents which are already being collected under other approved OMB collections. The Standard Practice disclosed in this collection are the same procedures, practices, compliances, and authorities that are also required in the industry. Based on this guidance this will drastically reduce the total annual burden hours. A list of the other OMB collections included in Section 1 of this Supporting Statement.

Multifamily will submit a new formatted MAP Guide to OMB for approval. A Form 83C to facilitate the format change of the MAP Guide will follow after the approval of this request to improve the appearance and for easier reading of the Guide.

16. Collection of information whose results will be published.

Collection of this information will not be published. Each form will be maintained with the HUD Program Office in individual case file.

17. Display of expiration date.

HUD is not seeking approval to avoid displaying the OMB expiration date.

18. Exceptions to Certification Statement.

There are no exceptions to the “Certification Statement” identified in item 19 of Form OMB 83-1.

B. Collection of information employing statistical methods.

There are no plans to use statistical methods for collection of this information.