"AMERICAN SURVEY OF MORTGAGE BORROWERS"

OMB NUMBER 2590-0015

SUPPORTING STATEMENT

A. JUSTIFICATION

1. Circumstances Necessitating the Collection of Information

The American Survey of Mortgage Borrowers (ASMB) is a component of the "National Mortgage Database" (NMDB®) Program, which is a joint effort of FHFA and the Consumer Financial Protection Bureau (CFPB). The NMDB Program is designed to satisfy the Congressionally-mandated requirements of section 1324(c) of the Federal Housing Enterprises Financial Safety and Soundness Act.[1] Section 1324(c) requires that FHFA conduct a monthly survey to collect data on the characteristics of individual prime and subprime mortgages, and on the borrowers and properties associated with those mortgages, in order to enable it to prepare a detailed annual report on the mortgage market activities of the Federal National Mortgage Association (Fannie Mae) and the Federal Home Loan Mortgage Corporation (Freddie Mac) for review by the appropriate Congressional oversight committees. Section 1324(c) also authorizes and requires FHFA to compile a database of otherwise unavailable residential mortgage market information and to make that information available to the public in a timely fashion.

As a means of fulfilling those and other statutory requirements, as well as to support policymaking and research regarding the residential mortgage markets, FHFA and CFPB jointly established the NMDB Program in 2012. The Program is designed to provide comprehensive information about the U.S. mortgage market and has three primary components: (1) the NMDB; (2) the quarterly National Survey of Mortgage Originations (NSMO); and (3) the ASMB.

The NMDB is a de-identified loan-level database of closed-end first-lien residential mortgage loans that is representative of the market as a whole, contains detailed loan-level information on the terms and performance of the mortgages and the characteristics of the associated borrowers and properties, is continually updated, has an historical component dating back to 1998, and provides a sampling frame for surveys to collect additional information. The core data in the NMDB are drawn from a random 1-in-20 sample of all closed-end first-lien mortgages outstanding at any time between January 1998 and the present in the files of Experian, one of the three national credit repositories, with a random sample of mortgages newly reported to Experian added each quarter.

The NMDB draws additional information on mortgages in the NMDB datasets from other

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[1] 12 U.S.C. § 4544(c).

existing sources, including Home Mortgage Disclosure Act (HMDA) data that are maintained by the Federal Financial Institutions Examination Council (FFIEC), property valuation models, and administrative data files maintained by Fannie Mae and Freddie Mac and by federal agencies. FHFA also obtains data from the two surveys conducted as part of the program—the NSMO and the ASMB.

The NSMO is a quarterly survey that provides critical and timely information on newly-originated mortgages and associated borrowers that are not available from other sources, including the range of nontraditional and subprime mortgage products being offered, the methods by which these mortgages are being marketed, and the characteristics of borrowers for these types of loans.[2]

While the NSMO provides information on newly-originated mortgages, the ASMB focuses on borrowers' experience with maintaining their existing mortgages. This includes their experience maintaining mortgages under financial stress, their experience in soliciting financial assistance, their success in accessing federally sponsored programs designed to assist them, and, where applicable, any challenges they may have had in terminating a mortgage loan. The ASMB is designed to collect information necessary to allow empirical analysis of two questions of vital importance to residential mortgage market policymakers and stakeholders:

1. What factors explain or predict which borrowers will become delinquent on their mortgages?

2. Once a borrower becomes delinquent, what factors explain or predict whether the borrower will (a) become current on the loan, (b) decide they cannot afford the mortgage and sell the property or modify the mortgage, or (c) remain delinquent and enter into foreclosure?

The ASMB is carried out primarily by a subcontractor, Westat, under the ultimate direction of FHFA. From 2016 through 2018, the ASMB questionnaire was sent once annually to a stratified random sample of 10,000 borrowers with mortgages in the NMDB. The data in the NMDB allows FHFA to target subpopulations (strata) that are of particular interest, such as borrowers who received counseling, borrowers who are delinquent on their mortgage, or borrowers who obtained a mortgage to purchase a home or to refinance a mortgage on their existing residence. Sampling within strata is random.

FHFA did not undertake the ASMB during 2019, but sent the survey again in the fall of 2020 with a specific focus on the experiences of borrowers during the COVID-19 pandemic.[3] The 2020 survey questionnaire was substantially similar to the previous questionnaires, except a number of questions specifically relating to the COVID-19 pandemic and its effects were added. In 2020, the ASMB had a 21 percent overall response rate, which yielded 2,100 survey responses.

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[2] OMB has cleared the NSMO under the PRA and assigned it control no. 2590-0012, which expires on June 30, 2023.

[3] A copy of the draft 2022 survey questionnaire is included as Attachment 1 to this Supporting Statement. Copies of the other communications that are to be sent to respondents are included as Attachment 4.

FHFA intends to send out the survey again in the fall of 2022 and again focus on the experiences of borrowers who were delinquent or received forbearance but were not delinquent during the pandemic. The survey sample will be similar to the 2020 ASMB. Two strata will be used for a total sample of 10,000 split between those were reported as delinquent, and those who took out forbearance but were not delinquent.

Seven completely new questions have been added regarding expanded mortgage payment forbearance options and borrowers' overall financial health. Additionally, four questions were added which were not in the 2020 ASMB, but were in either the 2018 ASMB or the current NSMO questionnaire. The remaining questions existed in the 2020 questionnaire, although some have been revised to address issues leaving forbearance rather than issues entering it. Because of the elimination of several questions, as well as the combination of some other questions, the total number of questions has decreased from 92 on the 2020 survey questionnaire to 86 on the 2022 questionnaire.

Each of the 86 questions on the 2022 ASMB survey questionnaire is designed to elicit one or more of five different categories of information that are not available in the administrative data and that are needed either to properly analyze the issues described above or information is needed to validate the survey responses. These categories are: (1) information needed to validate that the survey reached the correct borrower and that the borrower is providing answers about the correct loan; (2) information about the mortgage loan that does not exist in sufficient detail in the administrative data; (3) information about the borrower's economic circumstances that does not exist, or exists in insufficient detail, in the administrative data; (4) information about the borrower's attitudes regarding their mortgage, property, interactions with lenders and servicers, and life circumstances; and (5) information needed to determine the ultimate outcome of the borrower's forbearance or delinquency and the interim steps that led to that outcome.

To develop and refine the ASMB, the survey subcontractor, Westat, will conduct cognitive interviews of borrowers to pretest the survey materials. Such pretesting helps to ensure that the survey respondents can and will answer the survey questions and will provide useful data on their experiences with maintaining their existing mortgages. FHFA uses information collected through the cognitive interviews to assist in drafting and modifying the survey questions and instructions, as well as the related communications, to read in the way that will be most readily understood by the survey respondents and that will be most likely to elicit usable responses. Such information is also used to help determine how best to organize and format the survey questionnaire. FHFA is requesting OMB clearance for those cognitive interviews in addition to the actual survey.

2. Use of Data

The CARES Act of 2020[4] allowed a forbearance for mortgage borrowers impacted by the pandemic so they could pause or delay their mortgage payments. As borrowers exit their forbearance periods, FHFA and CFPB are actively engaged in monitoring the outcomes of these borrowers and the effects of this policy on the residential mortgage market. To assist in

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[4] Coronavirus Aid, Relief, and Economic Security Act, Pub. L. No. 116-136 (2020).

evidenced-based policymaking in these areas, the agencies have added questions to the 2022 survey questionnaire relating to borrowers' experiences with the forbearance process and the effect of the COVID-19 pandemic on home mortgage borrowers that are described in Item #1. It is critical for both agencies to have access to this information as quickly as possible and they are making every effort to send the survey out in the fall of 2022. Therefore, FHFA is requesting an OMB clearance to cover the 2022 ASMB survey.

More generally, FHFA views the NMDB Program as a whole, including the ASMB, as the monthly "survey" required by section 1324(c) of the Safety and Soundness Act. Core inputs to the NMDB, such as a regular refresh of the credit repository data, occur monthly, though the actual surveys conducted under the NMDB Program do not. The information collected through the ASMB is used, in combination with information obtained from existing sources in the NMDB, to assist FHFA in understanding how the performance of existing mortgages is influencing the residential mortgage market, what different borrower groups are discussing with their servicers when they are under financial stress, and consumers' opinions of Federally-sponsored programs designed to assist them. This important, but otherwise unavailable, information assists FHFA in the supervision of its regulated entities (Fannie Mae, Freddie Mac, and the Federal Home Loan Banks) and in the development and implementation of appropriate and effective policies and programs. The information may also be used for research and analysis by CFPB and other federal agencies that have regulatory and supervisory responsibilities or mandates related to mortgage markets and to provide a resource for research and analysis by academics and other interested parties outside of the government.[5]

FHFA uses information collected through the cognitive interviews to assist it in drafting and modifying the survey questions and instructions, as well as the related communications, to read in a way that will be most readily understood by the survey respondents and that will be most likely to elicit usable responses. Such information helps the Agency decide on how best to organize and format the survey questionnaire.

3. Use of Information Technology

The ASMB uses machine-readable paper questionnaires in English and also gives recipients the option of completing the survey online in either English or Spanish. Completed paper questionnaires are scanned and the responses are automatically uploaded into the electronic NMDB.

With respect to the cognitive interviews, information is collected through individual interviews, which may be conducted with or without electronic assistance, as well as through the use of non-electronic tools (such as hand-written notes or responses) and electronic tools (such as audio- and video-recordings).

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[5] For example, CFPB used data collected from the 2016-2018 ASMB waves as one component of a statutorily required assessment of its 2013 Real Estate Settlement Procedures Act (RESPA) mortgage servicing rule. For more information see the following document at pp. 28, 271-72:
https://files.consumerfinance.gov/f/documents/cfpb_mortgage-servicing-rule-assessment_report.pdf.

4. Efforts to Identify Duplication

As explained above, the majority of data included in the NMDB is drawn from existing sources—primarily, the consumer credit database maintained by Experian; the HMDA data released by FFIEC; and administrative data in the possession of FHFA, its regulated entities, and other federal agencies. As described under Item #1, the ASMB questionnaire is designed to obtain critical and timely information that is not available from existing sources. The survey obtains this information directly from borrowers, who are likely to be the most reliable and accessible—and, in some cases, the only—source for this information.

5. Impact on Small Entities

This information collection does not have a significant economic impact on a substantial number of small entities. The survey recipients are individuals only, and all responses are voluntary.

6. Consequences of Less Frequent Collection and Obstacles to Burden Reduction

FHFA conducted the survey annually from 2016 through 2018 and in 2020. FHFA intends to conduct the survey annually again beginning in 2022. FHFA is requesting OMB clearance to conduct three periodic surveys under the ASMB over the next three years. Less frequent collection could reduce the usefulness of the survey in assisting FHFA and CFPB in carrying out the regulatory responsibilities described under Items #1 and #2 and in keeping those agencies and other interested stakeholders abreast of how the performance of existing mortgages is influencing the residential mortgage market, whether borrowers are having difficulties maintaining their existing mortgages, and whether Federally-sponsored mortgage assistance programs are effective.

7. Circumstances Requiring Special Information Collection

There are no special circumstances that require FHFA to conduct the information collection in a manner inconsistent with OMB guidelines.

8. Solicitation of Comments on Information Collection

In accordance with the requirements of 5 CFR 1320.8(d), FHFA published a request for public comments regarding this information collection in the *Federal Register* on December 28, 2021.[6] The 60-day comment period closed on February 28, 2022. FHFA received no comments.

9. Provision of Payments or Gifts to Respondents

Survey recipients receive a $10 cash payment as an incentive to complete and return the ASMB questionnaire. Recipients who have not responded after two contacts will receive an additional cash payment of $20 upon completion of the survey.

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[6] *See* 86 FR 73770 (Dec. 28, 2021).

The survey implementation strategy comprises four respondent contacts over a seven-week period:

- *Week 1*: Printed questionnaire, cover letter, and cash incentive (entire survey sample population).
- *Week 2*: First reminder letter (entire survey sample population).
- *Week 5*: Second reminder letter, printed questionnaire, and promise of future cash incentive upon receipt of a completed survey (sampled borrowers who have not responded by Week 4).
- *Week 7*: Third reminder letter, which includes the due date for returning the questionnaire, to close the communication loop (sampled borrowers who have not responded by Week 6).

Each cognitive interview participant receives approximately $100 as an incentive payment.

10. Assurance of Confidentiality

With respect to the confidentiality of survey responses, the cover letter that accompanies the ASMB questionnaire will contain the following statement:

Completing this survey is voluntary. **Your answers will not be connected to your name or any other identifying information.** If you have any questions about this study, please call us toll free 1-855-531-0724 or visit our web sites, fhfa.gov/ASMB or consumerfinace.gov/ASMB.

The questionnaire itself contains a statement, required by the Privacy Act,[7] informing recipients that "[s]ubmission of the survey authorizes FHFA to collect the information provided and to disclose it as set forth" in the current System of Records Notice (SORN) for the National Mortgage Database.[8] The questionnaire also instructs recipients not to include their names or addresses when completing the questionnaire.

Section 1324 of the Safety and Soundness Act authorizes FHFA to modify the mortgage data released to the public as necessary to ensure that it contains no "representation of information that permits the identity of a borrower to which the information relates to be reasonably inferred by either direct or indirect means."[9] For each sampled loan and its associated borrower(s), Experian provides its survey subcontractor, Westat, with the identifying information it needs to administer the survey. However, the data on borrowers and loans that is accessible to FHFA, CFPB, and any other authorized user of the NMDB, including data obtained through the NSMO, does not include any direct identifying information such as borrowers' names, addresses, or Social Security numbers or the name of any financial institution.

Westat mails a survey questionnaire to the borrower(s) on each sampled mortgage loan at the property address associated with that mortgage. It then uses an encrypted key to track the

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[7] 5 U.S.C. § 552a.
[8] *See* 80 FR 52275 (Aug. 28, 2015); 81 FR 95595 (Dec. 28, 2016). Copies of the current SORN for the National Mortgage Database and a subsequent revision are included as Attachments 4a and 4b, respectively.
[9] *See* 12 U.S.C. §§ 4544(c)(3), (4).

surveys so that it can compile and maintain the survey opt-out list and identify non-responders to whom it must send follow-up correspondence. All returned questionnaires and any non-delivered mail are sent directly to Westat, not to FHFA, CFPB, or Experian. To maintain the de-identified nature of the data and the confidentiality of the survey responses, Westat purges all responses of any identifying information before providing the collected information to FHFA's NMDB Program staff for further processing (which is described in Part B of this Supporting Statement).

Similarly, while Westat knows the identity of the cognitive interview pre-testing participants, that information is not conveyed to FHFA and is not included in the NMDB in any form.

11. Questions of a Sensitive Nature

Of the 86 questions on the survey questionnaire, approximately 25 might be considered to be of a sensitive nature by particular borrowers. Questions that FHFA has identified as potentially sensitive include those requesting information on loan terms, property value, delinquency status, experience with foreclosure, actual and expected employment status, major life events, actual and expected income, actual and expected financial difficulties and efforts to deal with them, marital status, race and ethnicity.

Understandably, borrowers that have become delinquent or have defaulted on their loan payments, or whose homes have been foreclosed upon, may experience feelings of shame and embarrassment about disclosing information about those experiences and about the factors that led to them. However, policymakers must have access to accurate data that will allow them to understand the underlying reasons for delinquencies, defaults, and foreclosures, so they can design and implement policies and requirements that will be effective in reducing these negative outcomes' frequency and severity. In addition, while FHFA understands that some survey recipients will be reluctant to answer questions about those sensitive topics, the agency believes that others will see doing so as an opportunity to express themselves about issues of concern to them and to help others to avoid falling into similar difficult circumstances.

12. Estimates of the Hour Burden of the Information Collection

This information collection consists of two components: (1) the survey; and (2) the pre-testing of the survey questionnaire and related materials through the use of cognitive interviews. FHFA conducted the ASMB annually from 2016 through 2018, but did not conduct the survey again until the fall of 2020. FHFA intends to conduct the survey in 2022 and annually thereafter. The estimates assume that the Agency will conduct two rounds of pre-testing on each year of survey materials.

FHFA has analyzed the total hour burden on members of the public associated with conducting the survey (4,200 hours) and with pre-testing the survey materials (24 hours) and estimates the total annual hour burden imposed on the public by this information collection to be 4,224 hours. There are no hourly costs imposed upon recipients. The burden estimate for each component of the information collection was calculated as follows:

I.   *Conducting the Survey*

The estimated annualized hour burden associated with conducting the ASMB is 4,200 hours. The ASMB questionnaire will be sent to 10,000 recipients each time the survey is conducted. Although FHFA expects that on average only about 2,100 of those surveys will be returned, this burden estimate assumes that all the recipients will respond. The 25 minutes per survey completion time estimate includes the gathering of necessary materials to respond to the questions and is based on the reported experience of respondents to earlier ASMB questionnaires.

Recipients read and complete survey questionnaire and return the completed form to the survey subcontractor:

- Completion time per recipient: 0.42 hours
- Survey mail-outs annually: 1
- Recipients per survey: 10,000
- Total recipients annually: 10,000
- Total hours annually: 4,200 hours

II.   *Pre-Testing of Survey Materials*

The estimated annualized hour burden associated with the pre-testing of the survey materials is 24 hours.

Selected individuals participate in cognitive testing to pre-test the survey questionnaire and related materials:

- Participation time per person: 1 hour
- Cognitive interviews annually: 2
- Participants: 12
- Total participants annually: 24
- Total hours annually: 24 hours

13. Estimated Total Annualized Cost Burden to Respondents

There will be no costs imposed upon the respondents by this information collection. Postage costs to return the survey questionnaire will be pre-paid by the survey subcontractor.

14. Estimated Cost to the Federal Government

The estimated annual burden to the federal government is 167 hours and $438,360 calculated as follows:

FHFA analyst embeds ASMB data into query-based electronic database:

- Time per survey mail-out: 167 hours

- Total survey mail-outs per year: 1
- Total hours per year: 167 hours
- Hourly rate: $80 (includes salary, benefits, and overhead)
- Total cost: $13,360

In addition, FHFA will pay approximately $425,000 to the survey subcontractor each time it conducts a survey. Included in this amount are approximately: $105,000 for printing and assembly costs; $105,000 for the cash incentive payments to survey recipients; $45,000 for postage costs; $25,000 for cognitive testing; and $145,000 for other fixed costs.

$13,360 (hourly cost) + $425,000 (paid to subcontractor) = $438,360.

15. Reasons for Change in Burden

The estimated hour burden decreased to 4,224 hours in 2022 from 5,024 hours reported in 2020. As discussed above, the total number of questions has decreased to 86 on the 2022 questionnaire, from 92 on the 2020 survey questionnaire. Therefore, the estimated completion time per recipient decreased to 25 minutes in 2022, from 30 minutes in 2020. There are slight increases in the estimated cost due to expected wage increases.

16. Plans for Tabulation, Statistical Analysis and Publication

As of now, FHFA has not published any data obtained from the ASMB, although it has used data from the 2016-2018 and 2020 survey rounds internally. Although the Agency has not yet decided whether it will release the 2016-2018 data publicly, it is in the process of releasing the 2020 data. The Agency also plans to release the 2022 data to support research on the economic effects of the COVID-19 pandemic.

17. If Seeking Approval to Not Display the Expiration Date for OMB Approval of the Information Collection, Explain the Reasons Why Display Would Be Inappropriate

FHFA plans to display the expiration date for OMB approval.

18. Explain Each Exception to the Topics of the Certification Statement Identified in "Certification for Paperwork Reduction Act Submission."

There are no exceptions to the topics of the certification statement identified in the "Certification for Paperwork Reduction Act Submission."

B.   COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

1. **Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**

For the 2022 survey, a stratified random sample of 10,000 borrowers who had first-lien mortgages outstanding as of September 2021 and either experienced some delinquency or were in forbearance will be drawn from among the mortgages contained in the NMDB. As explained above, the NMDB is a 1-in-20 sample of all closed-end first-lien mortgages outstanding at any time between January 1998 and the present. FHFA estimates that there were 50 million outstanding first-lien mortgages in the U.S. as of January 1, 2022 and that the NMDB contains information on approximately 2.5 million of those mortgages.

FHFA estimates that the ASMB will generate a 21 percent overall response rate—*i.e.*, that it will yield approximately 2,100 survey responses (factoring in the fact that some of the 10,000 surveys mailed out will not be delivered)—going forward. This estimate is based on an actual response rate for the 2020 survey of 21 percent (This yielded 2,100 survey responses.).

2. **Describe the procedures for the collection of information, including:**
   - **Statistical methodology for stratification and sample selection,**
   - **Estimation procedure,**
   - **Degree of accuracy needed for the purpose described in the justification,**
   - **Unusual problems requiring specialized sampling procedures, and**
   - **Any use of periodic (less frequently than annual) data collection cycles to reduce burden.**

The intent of the survey is to compare the experience different groups of mortgage borrowers had maintaining their mortgage. For the 2022 survey, the targeted subpopulations (strata) that are of particular interest are mortgage borrowers who were in distress (having problems remaining current on their mortgage or other credit obligations) in September 2021. The sample strata are designed to produce final usable samples of approximately equal numbers of borrowers in each of two groups of primary interest to the survey—those who were reported as delinquent and those who took out forbearance. These sample sizes should provide a precision level of at least +/- 3 percent for comparisons among the two groups.

The NMDB includes comprehensive information, provided monthly by Experian, on forbearance status and the performance of each of the mortgage loan and non-mortgage credit obligations of each borrower contained in the database. This will enable FHFA to draw an accurate sample for the desired strata.

3. **Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.**

As explained in Item #9 in Part A, to maximize response rate, survey respondents receive a cash payment as an incentive to complete and return the questionnaire. To further increase response rates, survey recipients are also given the option of completing the survey online in either English or Spanish. The first mailing contains an insert, in both English and Spanish, which informs recipients of those options and provides the appropriate web addresses to access those electronic versions of the survey.

Both item and survey non-response are addressed using information from other sources. One advantage that the ASMB has over other surveys is the availability of credit and administrative data, much of which appears to be quite reliable. These data are used to assist in the editing and imputation process. Three primary sources of such data are: (1) credit data from Experian on sample loans; (2) data on the survey respondents obtained by Experian from other sources, including loan servicers and data companies; and (3) information for loans that can be matched to HMDA files.

After editing and cleaning the survey response data, FHFA imputes missing responses using statistical models estimated based on the credit and administrative data and answers to other questions in the survey. Missing values for item non-response are imputed statistically using an iterative process. Individual statistical models are developed for each question that used the key demographic variables as well as credit or administrative data such as loan amount and credit score as regressors in linear probability, logistic, or cell-based models (since almost all variables in the survey are categorical). In all instances the imputation incorporates a random component that reflects the accuracy of the imputation model. Variables are imputed in order, with higher order variables that dictated a skip-pattern imputed first, before the variables conditioned on the pattern are to be imputed. Once the first round of imputations is completed, the process is repeated with expanded predictive linear or logistic models that incorporated some of the newly imputed variables as regressors for other variables. This iteration ensures that correlations among the imputed values will better reflect correlations among observations where responses were available.

Commonly, in survey sampling, some individuals chosen for the sample are unwilling or unable to participate in the survey. Non-response bias is the bias that results when respondents differ in meaningful ways from non-respondents. When non-response bias is present, rather than accept a poor match between the sample and the population, it is now common to use weights to bring the two more closely into line. This is known as "non-response weighting." The ASMB has extensive credit and administrative data on both responding and non-responding borrowers that will be used to estimate non-response weights.

4. **Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and**

improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

FHFA uses information collected from the cognitive testing participants to assist the Agency in drafting and modifying the survey questions and instructions, as well as the related communications, to read in the way that will be most readily understood by the survey respondents and that will be most likely to elicit usable responses. Such information will also be used to help the Agency decide how best to organize and format the survey questionnaire. A copy of the most recent version of FHFA's cognitive testing protocol, which was provided to FHFA on March 31, 2022, is included as Attachment 5.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

The names of and contact information for individual stakeholders from FHFA, CFPB, and Experian, including those who were consulted on statistical aspects of the design and who will analyze the data, appear in the list included as Attachment 6. FHFA also consulted with the following:

The subcontractor hired by Experian to carry out the survey and the cognitive testing is:

Westat
1600 Research Blvd,
Rockville, MD 20850

List of Attachments:

1. Draft ASMB questionnaire to be mailed in August 2022
2. Draft ASMB communication package (in English) for 2022
3. 60-day PRA Notice published at 86 FR 73770 (Dec. 28, 2021).
4. National Mortgage Database System of Record Act Notices:
   a. SORN published at 80 FR 52275 (Aug. 28, 2015)
   b. Revision to SORN published at 81 FR 95595 (Dec. 28, 2016)
5. Cognitive Testing Protocol dated March 31, 2022
6. List of National Mortgage Database stakeholders