

**Supporting Statement for
Ginnie Mae Multiclass Securities Program Documents
OMB #2503-0030**

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

This information collection is required in connection with the operation of the Ginnie Mae Multiclass Securities program. Ginnie Mae's authority to guarantee multiclass instruments is contained in Section 306(g)(1) of the National Housing Act ("NHA") (12 U.S.C. Section 1721(g)(1)), which authorizes Ginnie Mae to guarantee "securities...based on or backed by a trust or pool composed of mortgages...". Multiclass securities are backed by Ginnie Mae Single Class securities, which are backed by government insured or guaranteed mortgages. Ginnie Mae's authority to operate a Multiclass Securities program is recognized in Section 3004 of the Omnibus Budget Reconciliation Act of 1993 ("OBRA"), which amended Section 306(g)(3) of the NHA (12 U.S.C. Section 1271 (g) (3)) to provide Ginnie Mae with greater flexibility to administer the Multiclass Securities program regarding fee structure, contracting, industry consultation and program implementation. Congress annually sets Ginnie Mae's commitment authority to guarantee MBS pursuant to Section 306(g)(2) of the NHA (12 U.S.C. Section 1271 (g)(2)). Since multiclass securities are backed by Ginnie Mae Single Class MBS, Ginnie Mae has already guaranteed the collateral for the multiclass instruments.

The Ginnie Mae Multiclass Securities program consists of Ginnie Mae Real Estate Mortgage Investment Conduit ("REMIC") and Platinum. The Multiclass Securities program provides an important adjunct to Ginnie Mae's secondary mortgage market activities, allowing the private sector to combine and restructure cash flows from Ginnie Mae MBS into securities that meet unique investor requirements in connection with yield, maturity, and call-option protection. The intent of the Multiclass Securities program is to increase liquidity in the secondary mortgage market and to attract new sources of capital for federally insured or guaranteed residential loans. Under this program, Ginnie Mae guarantees, with the full faith and credit of the United States, the timely payment of principal and interest on Ginnie Mae REMIC and Platinum.

Ginnie Mae's powers are prescribed by Title III of the National Housing Act, as amended, 12 U.S.C. 1716, et seq.

- 2. Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

This is a revision of a currently approved collection. The information provided by the participant will be submitted to Ginnie Mae. Ginnie Mae requires the information requested in order to ensure the financial integrity of the program.

Respondents/entities are mortgage companies, large banks, savings and loans and broker dealers.

Participants are required to complete Ginnie Mae Multiclass Securities program transaction documents, which warrant compliance with the Ginnie Mae Multiclass Securities Guide in effect as of the date of the Ginnie Mae guaranty is placed on the security.

Ginnie Mae requires information from entities that wish to participate as sponsor, co-sponsor, accountant, trust counsel, co-trust counsel, and trustee. Each participant is required to execute certification and agreement documents and Ginnie Mae Multiclass Securities program transaction documents.

Each participant is required to annually certify that neither the participant nor any employee, partner or officer working on the Ginnie Mae Multiclass Securities program has been convicted or found liable in the following: a civil action; fraud; forgery; bribery; falsification or destruction of records, making false statements that indicate a lack of business integrity; and has not been debarred by a state or the Federal government.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

With respect to the processes that are used to collect and analyze data, some functions have been automated where there is a large amount of data being collected and analyzed. Information collected in the form of legal agreements and documents requiring signatures is completed electronically via DocuSign.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

There is no duplication of information, nor is there similar information available.

- 5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I) describe any methods used to minimize burden.**

Ginnie Mae has attempted to minimize the burden on participants by requiring a minimal amount of information to be collected in order to ensure the integrity of its Multiclass Securities program.

- 6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The financial integrity of the Multiclass Securities program is at risk if the information is not collected. There are no legal obstacles in reducing the burden.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- requiring respondents to report information to the agency more than quarterly; **N/A**
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; **N/A**
- requiring respondents to submit more than an original and two copies of any document; **N/A**
- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years; **N/A**
- 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; **N/A**

- requiring the use of a statistical data classification that has not been reviewed and approved by OMB; N/A
- 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; or N/A
- 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. N/A

There are no circumstances that would cause this information collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6. Participants are required to submit the collections of information for the Ginnie Mae REMIC and Platinum programs as deals are made. The frequency per year is determined by the number of deals that are made between the sponsor and trustee. These transactions require separate documents for each deal, thus the need to submit documents more than quarterly. Participants in the REMIC program do an average of 25 deals per year, participants in the Platinum program do an average of 70 deals per year.

- 8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Consultations were made with the participants and Ginnie Mae's financial advisors and the public on the information collection. Comments and suggestions are also considered through the 60-day comment period after publication of this collection of information in the Federal Register, dated June 20, 2023, Vol. 88, No. 117.

- 9. Explain any decision to provide any payment or gift to respondents, other than re-numeration of contractors or grantees.**

The collection of this information does not provide payment or gift to respondents, other than remuneration.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

No assurances of confidentiality are provided.

- 11. 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.**

There is no sensitive information required in the application process.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices;**
- **if this request covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I; and**
- **provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

An estimate of the hour burden to collect the information for each form is provided (below).

A	B	C	D	E	F	G	H
Information Collection	Number of Respondents	Frequency of Response	Responses per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Pricing Letter	25	10	250	0.5	125	\$45.56	\$5,695.00
Structured Term Sheet	25	10	250	3	750	\$45.56	\$34,170.00
Trust (REMIC) Agreement	25	10	250	1	250	\$45.56	\$11,390.00
Trust Opinion	25	10	250	4	1000	\$45.56	\$45,560.00
MX Trust Agreement	25	10	250	0.16	40	\$45.56	\$1,822.40
MX Trust Opinion	25	10	250	4	1000	\$45.56	\$45,560.00
RR Certificate	25	10	250	0.08	20	\$45.56	\$911.20
Sponsor Agreement	25	10	250	0.05	12.5	\$45.56	\$569.50
Table of Contents	25	10	250	0.33	82.5	\$45.56	\$3,758.70
Issuance Statement	25	10	250	0.05	12.5	\$45.56	\$569.50
Tax Opinion	25	10	250	4	1000	\$45.56	\$45,560.00
Transfer Affidavit	25	10	250	0.08	20	\$45.56	\$911.20
Supplemental Statement	25	0.25	6.25	1	6.25	\$45.56	\$284.75
Final Data Statements (attached to closing letter)	25	10	250	32	8000	\$45.56	\$364,480.00
Accountants'	25	10	250	8	2000	\$45.56	\$91,120.00

Closing Letter							
Accountants' OSC Letter	25	10	250	8	2000	\$45.56	\$91,120.00
Structuring Data	25	10	250	8	2000	\$45.56	\$91,120.00
Financial Statements	25	10	250	1	250	\$45.56	\$11,390.00
Principal and Interest Factor File Specifications	25	10	250	16	4000	\$45.56	\$182,240.00
Distribution Dates and Statement	25	10	250	0.42	105	\$45.56	\$4,783.80
Term Sheet	25	10	250	2	500	\$45.56	\$22,780.00
New Issue File Layout	25	10	250	4	1000	\$45.56	\$45,560.00
Flow of Funds	25	10	250	0.16	40	\$45.56	\$1,822.40
Trustee Receipt	25	10	250	2	500	\$45.56	\$22,780.00
Subtotal			5,756.25		24,713.75		\$1,125,958.45
Deposit Agreement	70	10	700	1	700	\$45.56	\$31,892.00
MBS Schedule	70	10	700	0.16	112	\$45.56	\$5,102.72
New Issue File Layout	70	10	700	4	2800	\$45.56	\$127,568.00
Principal and Interest Factor File Specifications	70	10	700	16	11200	\$45.56	\$510,272.00
Subtotal			2800		14,812.00		674,834.72
Total Cost			8,556.25		39,525.75		\$1,800,793.17

Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information (do not include the cost of any hour burden shown in Items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

No other costs are associated with the collection of this information.

13. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The estimated cost to the Federal government for the multiclass portfolio was \$10.4 million. The breakdown is as follows.

REMICS:

The average fee paid to Financial Advisors at issuance based on 2023 Fiscal Year Data: \$3.4 million.
The average fee paid to Legal Advisors at issuance based on 2023 Fiscal Year Data: \$5.5 million.
The average fee paid to the Information Agent at issuance based on 2023 Fiscal Year Data: \$48,171

Platinum:

The average fee paid to Information Agents and the Federal Reserve for processing Platinum pools based on the number of pools outstanding for 2023 Fiscal Year Data: 1.0 million.

14. Explain the reasons for any program changes or adjustments reported in Items 13 and 14 of the OMB Form 83-I.

Program changes occurred due to an increase in the number of potential sponsors in the REMIC Securities and Platinum programs.

15. For collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

This is a revision of a currently approved collection. Program changes occurred due to an increase in the number of potential respondents/sponsors in the REMIC Securities and Platinum programs.

Ginnie Mae does not plan to publish the results of this collection of information or use the data for statistical purposes.

16. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Ginnie Mae is not seeking approval to not display the expiration date.

17. Explain each exception to the certification statement identified in item 19.

Ginnie Mae does not request an exception to the certification statement identified in item 19.
