Supporting Statement for Paperwork Reduction Act Submissions Application for Fee or Roster Personnel (Appraisers) Designation and Appraisal Reports OMB Control Number: 2502-0538

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 clearance package seeks to renew the OMB approval of 2502-0538. Chapter 13 Title 12 of the National Housing Act, (Pub. L. 73-479, 48 Stat. 1246, 12 U.S.C. 1709 et seq.) authorizes the Secretary of HUD, upon application by the lender, to insure mortgages offered to HUD that are eligible for insurance. The Housing and Community Development Act of 1987, 42 U.S. Code § 3543 authorizes HUD to collect the SSN on form 92563-A. Regulations codified at 24 CFR 203.15 require valuations pertinent to eligibility for HUDs single family mortgage insurance programs.

Accurate and thorough appraisal reporting is critical to the accuracy of underwriting for the mortgage insurance process. The need for accuracy is increased for FHA insured mortgages since buyers tend to have more limited income and lower equity in the properties. This collection of information provides a more thorough and complete appraisal of prospective HUD-insured single-family properties ensuring that mortgages are acceptable for FHA insurance and thereby protect the interest of HUD, the taxpayers, and the FHA insurance fund. Policies and procedures for governing the national FHA Appraiser Roster are set forth in Title 24 of the CFR: 24 CFR 200.200-202, 206.

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.

In compliance with regulations at 24 CFR 200.202, application for placement on the FHA Appraiser Roster requires completion and submission of form HUD-92563A, Application for Roster Personnel Designation to HUD for review and processing.

Prior to June 15, 2024, the form required the appraiser to print, sign, scan and send the completed form with all the certifications that the appraiser makes above the appraiser's signature, to HUD. On June 15, 2024, digital signature capability was implemented. HUD no longer requires a scan of an "ink" signature, and that signature is captured electronically. This information is collected when the appraiser applies to be on the FHA Appraiser Roster and is stored electronically in FHA Connection but can only be viewed by HUD employees with special clearance. Qualified applicants are then placed on the FHA Appraiser Roster from which FHA approved mortgagees select appraisers. The information is not shared with any other government agency. Appraisers seeking renewal to remain on the FHA Appraiser Roster only submit copies of their updated state certification/license.

To remove an appraiser from the roster, HUD must provide the appraiser with a written notice. An appraiser wishing to be reinstated must send HUD a written response appealing the proposed removal and send a written request for a conference. If there has been a state sanction against an appraiser, HUD requires evidence demonstrating that the state-imposed sanction has been lifted. The average time to prepare a response to the notification of sanction is approximately 90 minutes.

During the past year, HUD has received approximately **820** new applications from appraiser respondents.

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.

HUD Form -92563-A , "Application for Appraiser Fee or Roster Personnel Designation," and Form HUD Form -92564-CN, "For Your Protection: Get A Home Inspection," are available online at HUD's Client Information and Policy System (HUD Clips) world wide web address, https://www.hud.gov/program_offices/administration/hudclips/forms.

Prior to June 15, 2024, form HUD-92563-A was a PDF fillable file format that new applicants were required to fill-in and print the application form HUD-92563-A from A HUD webpage, sign it and scan into a PDF format for delivery, so that HUD will have original signatures on file. On June 15, 2024, the data collection is done electronically from FHA Connection (FHAC) via https://entp.hud.gov/idapp/html/f17apr-application.cfm. The online form allows the user to input the required information, collects an electronic signature, and creates a HUD-92563-A PDF that the appraiser can download for their records, and is also stored automatically in FHA Connection (FHAC) as a PDF. Applicants must also scan their state-issued certification in PDF format to upload in the required area of FHAC.

Under FHA-Single Family's current insurance endorsement policy, a Direct Endorsement (DE) lender may apply for FHA insurance based upon its underwriting of the loan. During the closing process, most lenders log on to a web-based application, FHAC, to verify the information in the Appraisal Logging Screen and complete the Insurance Application. The data entered in FHAC are subsequently transferred to the Computerized Homes Underwriting Management System (CHUMS) and Single-Family Data Warehouse (SFDW), the system of record for the endorsement process. Large lenders with Loan Origination Systems (LOS) transmit data from their LOS or use third party software to send data to CHUMS via a digital method known as B2G (Business to Government).

Fannie Mae Forms: 1004, 1004C, 1004D, 1007, 1025, 1073, 1075, and 2055. 12 U.S.C. 1708(g) requires the Secretary to prescribe standards for the appraisal of all properties to be insured by FHA. Appraisal requirements for FHA properties are set forth in Title 24 of the Code of Federal Regulations (CFR) at 24 CFR 200.145, 203.5, 203.15, 203.37a, 203.255, 203.258, 203.284, 203.368, 206.3, 206.52, 206.115, 206.125, 206.127. There are additional appraisal requirements in

the HUD Single Family Policy Handbook 4000.1, Section II.D, and in FHA's Appraisal Report and Data Delivery Guide.

An appraisal is generally required for all single-family mortgage transactions. It is a real estate/mortgage industry standard required by organizations such as the Federal National Mortgage Association (Fannie Mae), the Federal Home Loan Mortgage Corporation (Freddie Mac) and the Department of Veterans Affairs (VA).

FHA requires the Fannie Mae and Freddie Mac Appraisal Report Forms referenced below for specific types of properties. Lenders collect these forms for every loan and submit them through the Electronic Appraisal Delivery (EAD) web portal. The information is not shared with any other government agency.

- Fannie Mae Form 1004 dated March 2005, "Uniform Residential Appraisal Report" required to report an appraisal of a one-unit property or a one-unit property with an accessory unit.
- Fannie Mae Form 1004C dated March 2005, "Manufactured Home Appraisal Report" required to report an appraisal of a one-unit manufactured home.
- Fannie Mae Form 1004D dated March 2005, "Appraisal Update and/or Completion Report" required to provide an accurate update of a prior appraisal and/or to report a certification of completion.
- Fannie Mae Form 1007 dated August 1988, "Single Family Comparable Rent Schedule" required to provide market rent for a one-unit property or a one-unit property with an accessory unit.
- Fannie Mae Form 1025 dated March 2005, "Small Residential Income Property Appraisal Report" required to report an appraisal of a two- to four-unit property.
- Fannie Mae Form 1073 dated March 2005, "Individual Condominium Unit Appraisal Report" required to report an appraisal of a unit in a condominium project or a condominium unit in a planned unit development (PUD).
- Fannie Mae Form 1075 dated March 2005, "Exterior-Only Inspection Individual Condominium Unit Appraisal Report" required to report an appraisal of a unit in a condominium project or a condominium unit in a planned unit development (PUD). in an FHA-to-FHA refinance transaction only.

Fannie Mae Form 2055 dated March 2005, "Exterior-Only Inspection Residential Appraisal Report" may be used to report an appraisal of a one-unit property or a one-unit property with an accessory unit in an FHA-to-FHA refinance transaction only. Fannie Mae appraisal forms are also available online at https://singlefamily.fanniemae.com/learning-center/applications/appraisers-property-underwriting.

As of June 27, 2016, lenders are required to upload electronic appraisals directly into HUD's Electronic Appraisal Delivery (EAD) portal. The portal eliminates the need for lenders to print appraisals and include them in paper case binders. Lenders are required to automate the submission of appraisals through direct integration or submit them through an EAD web portal.

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.

A review of other information collections did not identify duplication with other forms or processes.

5. If the collection of information impacts small businesses or other small entities describe any methods used to minimize burden.

There is no significant impact on small businesses or other small entities.

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 appraisal of the property is a necessary underwriting requirement of FHA mortgage insurance, as well as a requirement for mortgages in the private sector or for other government agencies such as the VA. FHA is not imposing an additional burden or a requirement that differs from the private sector. A lack of an appraisal can result in the insurance of mortgages that are not acceptable (i.e., should not be insured) and thereby risk a financial loss to the FHA insurance fund. Additionally, an appraisal that is not performed by a qualified and knowledgeable appraiser presents a risk to the FHA insurance fund.

- 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; **Does not apply**
 - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; **Does not apply**
 - requiring respondents to submit more than an original and two copies of any document;
 Does not apply
 - requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years; **Does not apply**
 - 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; **Does not apply**
 - requiring the use of a statistical data classification that has not been reviewed and approved by OMB; **Does not apply**
 - 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 **Does not apply**

• 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. **Does not apply**

There are no special circumstances required in this collection of information:

- 8. If applicable, provide a copy and identify the date and page number of publication 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.
 - Describe efforts to consult with persons outside the agency to obtain their views on the
 availability of data, frequency of collection, the clarity of instructions and recordkeeping
 disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or
 reported.
 - Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.

In accordance with 5 CFR 1320.8(d), a 60-day Federal Register Notice (FR-7086-N-34) soliciting public comments was published in the Federal Register on December 27, 2024, FR 2024-30796 with comments due by February 25, 2025. No comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than renumeration of contractors or grantees.

Respondents are not provided with payments or gifts for this information collection.

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 system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

No assurance of confidentiality is provided for the information collection except as noted in the Privacy Act Statement on form HUD-92563-A, which prohibits disclosure outside the agency without the individual's consent, except to verify the accuracy of the information; or if necessary, disclosing the information as part of an investigation. The Privacy Act of 1974 protects respondents who meet these information-reporting requirements for all other forms. The information collected is secured in the FHA Connection system with access limited to a few key HUD employees. The Housing and Community Development Act of 1987, 42 U.S.C. 3543 authorizes HUD to collect the SSN on form 92563-A. HUD Form 92563-A collect personally

identifiable information (PII). The information collected is required in compliance with 24 CFR §200.202 that prohibits appraisers who have defaulted on a federal obligation as demonstrated by being listed in HUD's Credit Alert Interactive Verification Response System (CAIVRS) from being approved for placement on the FHA Appraiser Roster. CAIVRS searches for matches to defaulted federal obligations by social security number. To comply with the requirements of the regulations, HUD must collect the social security numbers of potential appraisers.

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.

This information collection does not contain questions of a sensitive nature. The information collected on Form HUD 92563-A is required to comply with the requirements of regulations at 24 CFR 200.202 that to be eligible for placement on the Appraiser Roster, the applicant must not be listed on HUD's Credit Alert Verification Reporting System (CAIVRS). Such listing is indicative of having defaulted on a federal obligation. HUD must collect the social security number in order to conduct a search in CAIVRS to determine eligibility for placement on the FHA Appraiser Roster.

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 chart below; 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.

In the past year, HUD has received approximately **820** new applications from appraisers, that includes copies of their state licenses as required. HUD requires the form HUD-92564-CN to be provided by lenders to potential home purchasers yet is not signed or collected by FHA and neither stored nor provided to any other agency.

Information	Number of	Frequency	Responses	Burden	Annual	Hourly	Annual
Collection	Respondents	of Response	Per Annum	Hour Per	Burden	Cost Per	Cost
		_		Response	Hours	Response	

HUD-92563-A	820	1	820	0.2	164	\$37.10	\$6,084
State License	22,973	1	22,973	0.05	1,149	\$37.10	\$42,614.92
HUD-92564-	633,494	1	633,494	0.02	12,670	\$33.74	\$427,481.75
CN							
Total	657,287		657,287		13,983		\$476,181.07

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for appraisers is estimated to be \$37.10 per hour, therefore, the estimated burden hour cost to respondents/appraisers is estimated to be \$48,712 annually. According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for all occupations (home purchaser) is estimated to be \$33.74 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents all occupations (home purchasers) is estimated to be \$427,481 annually.

- 13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet shown in Items 12 and 14). No additional costs are incurred.
 - 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.

No costs are incurred for (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component.

• 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.

No costs are incurred for purchasing or contracting out information collections services; therefore, no cost estimates are expected to vary widely.

• 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 costs are incurred for purchases of equipment or services, or portions thereof; therefore, no estimates are needed.

14. 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.

Information Collection	Number of Respondents	Frequency of Response	Response s Per	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
			Annum				
All forms	38,196	1	38,196	0.0286	1,092	\$57.78	\$63,119.20
submitted for							
HUD Review							

This cost involves the time it takes a Credit Policy Specialist to review the HUD 92563-A to review and process Appraiser Roster Applications and renewal documentation, including appraiser license(s), , staff preparation time, and system data entry, etc. The hourly cost to conduct the review is based on an estimate of \$57.78. (base hourly salary for a GS-13 Step 1) employee as determined by the Office of Personnel, OPM 2025 Salary (Hourly) Rate Table GS-13, Step 1) =\$57.78). https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2025/general-schedule/

15. Explain the reasons for any program changes or adjustments reported in Items 12 and 14 of the Supporting Statement.

This is an extension of a currently approved collection. As of June 16, 2024, information on Form HUD-92563 was automated allowing the electronic collection of the information required on the form. Prior to 2008 Form HUD-92563, titled "Application for Fee or Roster Personnel Designation", served a dual purpose as application for placement on FHA Inspector Roster and Application for placement on FHA Appraiser Roster. On July 2, 2018 HUD published Final Rule FR-5457-F-02, Streamlining Inspection Requirements for Federal Housing Administration (FHA) Single- Family Mortgage Insurance: Removal of the FHA Inspector Roster. The removal of the Inspector Roster eliminated the need to retain a checkbox for "Compliance Inspectors" on HUD-92563, and the form was revised accordingly. Below are the before and after versions of the form.





16. 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.

The results of this information collection will be published only to the extent that approved applicants will be listed on the FHA Appraiser Roster. The list is available online, restricted to authorized HUD employees, via HUD's intranet website at https://entp.hud.gov/idapp/protect/apprlook.cfm and via the public facing website at https://entp.hud.gov/idapp/html/apprlook.cfm. No complex or analytical techniques will be used, and there is no termination date for this activity.

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

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

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

There are no exceptions to the certification statement identified in item 19.

B. Collections of Information Employing Statistical Methods

Not Applicable