Supporting Statement for Paperwork Reduction Act Submissions
Section 184 and 184A Loan Guarantee Program
OMB# 2577-0200

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.**

   On March 20, 2024, HUD published the final rule (89 FR 20032) titled "Strengthening the Section 184 Indian Home Loan Guarantee Program", which contains a comprehensive overhaul of the Section 184 regulations (RIN:2577-AD01). Under the Final Rule stakeholders are required to submit forms and other information to HUD for the proper administration of the Section 184 program. The forms contained in this Paperwork Reduction Act submission result from the regulations under the Final Rule.

   The Section 184 Indian Home Loan Guarantee (Section 184) Program, authorized under section 184 of the Housing and Community Development Act of 1992 (Act), as amended, 12 U.S.C., 1715z-13a, guarantees loans made to Indian families, Tribes, and Tribally Designated Housing Entities. Section 184 loans must be used for the construction, acquisition, refinance and habilitation of one to four family dwellings.

   Similarly, Section 184A of the Act, as amended, 12 U.S.C. 1715z-13b, authorizes HUD to guarantee loans made to Native Hawaiian families, the Office of Hawaiian Affairs, the Department of Hawaiian Homelands, and private nonprofit or for-profit organizations experienced in the planning and development of affordable housing for Native Hawaiians. The Section 184A loans must also be used for the construction, acquisition, refinance and rehabilitation of one to four family dwellings.

   The information collection is necessary to ensure loans guaranteed under the Section 184 and Section 184A Programs comply with the Act and the regulations under 24 CFR parts 1005 and 1007, respectively.

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 collection is a reinstatement with change of a previously approved collection. The information collected on the forms is to be provided by Tribes, lenders, borrowers, servicers and building inspectors with loans guaranteed by the Section 184 and Section 184A Programs.

   The information collection from the Tribes will be used by HUD to determine the land status and jurisdiction for Section 184 loans on Tribal Trust lands.

The information collection from lenders and inspectors will be used by HUD to determine whether a loan is eligible for a loan guarantee under the Section 184 Indian Housing Loan Guarantee program and/or the Section 184A Native Hawaiian Housing Loan Guarantee program. Specifically these forms will be used for: (1) requesting a case number from HUD; (2) requesting a firm commitment for a loan guarantee from HUD; (3) providing additional, program specific information as an addendum to the Uniform Residential Loan Application; (4) providing HUD a justification for an escrow account and an assurance of completion for work to be done on the Property after loan closing; (5) confirming borrower acknowledgment for the use of loan funds in a Section 184 or Section 184A Single Close Construction loan; (6) providing additional information to HUD when the Property is a condominium; (7) submitting builders certification of plans and specs and changes to approved drawings and plans; and (8) providing an analysis of a borrower's mortgage credit, settlement costs and mortgage calculations. Housing inspectors will submit information to HUD regarding inspections performed when a Section 184 loan is used for the construction of a home. This information collection also includes administrative documents for when a lender requests a loan guarantee refund and when reporting a change in lender or servicer on the Section 184 or the Section 184A loan.

The information collection through these forms will be submitted to HUD electronically through an online portal, *Native Advantage*, accessible to lenders. This information is not collected elsewhere.

New forms in this collection are included in this table.

Form/Document	Title	Description	Reporting Frequency
HUD-50097	Direct Guarantee Firm Commitment Request	Provides HUD with loan information to determine funds needed to reserve from US Treasury for a specific case	Per mortgage transaction
HUD-50098	Lender Assurance of Completion	Provides HUD with verification that a lender ensures all required construction/rehab has been completed and that all escrow funds have been distributed	Per construction/rehab mortgage transaction
HUD-50101	Single Close Construction and Rehab Acknowledgement	Provides HUD with verification that borrowers understand the terms of constructing or rehabilitating a home, use of loan funds, holdbacks for repairs and acknowledgement of construction risks	Per construction/rehab mortgage transaction
HUD-50102	Condominium Loan Level Single Unit Approval Questionnaire	Provides HUD with Condominium Project and specific unit information to determine if it meets HUD insurance eligibility requirements	Per condominium mortgage transaction
HUD-50103	Extension Request	Provides HUD with information from Servicer related to Servicer's request for additional time to perform certain servicing actions, such as initiating First Legal Action and conveyance of property to HUD.	Per servicing deadline event.
HUD-50104	Exceed Cost Limit for Property Protection and Preservation Request	Provides HUD with information from Servicer related o Servicer's request to exceed cost limits related to a property preservation action.	Per servicing event.
HUD-50105	Compliance Inspection Report	Provides HUD with verification that new construction, manufactured homes, and/or renovations meet HUD minimum property standards, building codes, and approved plans	Per construction/rehab mortgage transaction
HUD-50106	Mortgage Record Change	Provides HUD with information related to a change in the Holder of the Note or change in Servicer	Per change in Holder or Servicer transaction.
HUD-50107	Builder Certification of Plans, Specs	Provides HUD with verification that the construction project complies with HUD minimum property standards, local building codes, energy codes and environmental safety	Per construction/rehab mortgage transaction

		regulations	
HUD-50108	Pre-foreclosure Sale Request for Variance	Provides HUD with information from Servicer related to Servicer's request for variance in pricing for a property under the Pre-Foreclosure Sale.	Per Pre-Foreclosure Sale Program transaction.
HUD-50109	Request for Acceptance of Changes Approved Drawings and Specifications	Provides HUD with updated site plans, structural designs, or material specifications, ensuring changes will comply with HUD minimum property standards	Per construction/rehab mortgage transaction with changes
HUD-50111	Addendum to URLA	Provides HUD with verification of borrower eligibility and loan terms	Per mortgage transaction
HUD-50129	Loan Guarantee Fee Refund Request	Provides HUD with information regarding Servicer's request that HUD provide a refund to Borrower due to overpayment of Borrower's Annual Loan Guarantee Fee	Per refund transaction
HUD-50131	Case Number Request	Provides HUD with loan and borrower information to determine loan eligible to issue a unique identification tracking number for a loan and identify the loan purpose	Per mortgage transaction
HUD-50175	Section 184 MCAW	Provides HUD with critical underwriting information to determine the maximum loan amount, calculate the loan guarantee fee, and verified borrower eligibility	Per mortgage transaction
HUD-50114	Tribal Land Status Jurisdiction	Provides HUD with specific land status information for all Tribal Trust Land	Per Tribal Trust mortgage transactions

Additional forms in the collection that have already been approved are in the table below.

Form/Document	Title	Description	Reporting Frequency
HUD-50172	Section 184 Tribal Application	Provides HUD with information about the Tribe when the Tribe is applying to participate in the Section 184 Program.	Once
HUD-50171	Section 184 Tribal Annual Recertification	Provides HUD with information to determine whether the Tribe continues to meet Section 184 eligibility and participation requirements.	Annually
HUD-50177	Section 184 Borrower's Authorization of Tribal Notification	Records the borrower's decision whether s/he wishes to authorize lender and servicer, and any successor lender and servicer, to disclose the borrower's mortgage default to the borrower's Tribe.	Per mortgage transaction
HUD-50173	Section 184/184A Borrower's Identity of Interest and Conflict of Interest Certification	Records borrower's certification that there is no identity of interest or conflict of interest with respect to the mortgage transaction. If there is an identity of interest the form records borrower's disclosure of what the identity of interest may be.	Per mortgage transaction
HUD-50178	Section 184 Lender Application	Provides HUD with information to determine whether the lender applicant is eligible to participate in the Section 184 Program.	Once
HUD-50174	Section 184/184A Lender Annual Recertification	Provides HUD with information to determine whether the lender continues to be eligible to participate in the Section 184/184A Program.	Annually
HUD-50176	Section 184/184A Warranty of Completion	Records builder's certification that builder warrants to the borrower, the property against defects in equipment, material, or workmanship supplied or performed by the builder.	Per mortgage transaction, if applicable
HUD-50179	Section 184 Notice of Conveyance of Deed to HUD	Provides HUD notice that the holder of the mortgage has conveyed the property guaranteed by the Section 184 Program to HUD.	Per mortgage transaction, if applicable
HUD-50180	Section 184 Pre-Foreclosure Sale Program Agreement	Records Section 184 servicer's agreement with the borrower that the borrower will comply with the terms and conditions of the Pre-foreclosure Sale Program.	Per mortgage transaction, if applicable

HUD-50170	Section 184 Pre-Foreclosure Sale Program Sales Contract Review	Records the Section 184 servicer's approval or disapproval of the sales contract offered by a purchaser of a property under the Section 184 Pre-foreclosure Sales Program.	Per mortgage transaction, if applicable
HUD-50169	Section 184 Pre-Foreclosure Sale Program Closing Worksheet	Records the information related to the sale of a home to a purchaser under the Pre-Foreclosure Sale Program. The worksheet discloses deductions made against the sales price and the net proceeds to the lender.	Per mortgage transaction, if applicable

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 to adopt this means of collection. Also describe any consideration of using information technology to reduce burden.**

   The forms will be fillable PDFs that the program stakeholders will use and submit to HUD electronically. The collection of information does not involve any other use of automated, electronic, mechanical or technological collection techniques.

   The forms will be posted on HUD's website. Lenders will obtain the forms from HUD's website.

   The information collection through these forms will be submitted to HUD electronically through an online portal, *Native Advantage*, accessible to lenders. Lenders must use the online portal to request HUD endorse the loans. The online portal requires a username and password a Lender establishes when they become an approved Section 184 Program Lender.

   For forms that require signatures, HUD will accept either wet signatures or electronic signatures.

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.**

   This information is not collected elsewhere.

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

   This collection of information does not significantly impact small businesses or entities.

6. **Describe the consequences 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.**

   If the collection is not conducted or conducted less frequently, the Department would not be able to ensure that Sections 184 and/or 184A stakeholders, such as Tribes, Section 184/184A borrowers, and builders of Section 184/184A homes are in compliance with fundamental Section

184/184A statutory and/or regulatory requirements, and will not be able to guarantee loans that do not have the information contained in this collection.

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.**

  The majority of the forms are required on a per mortgage transaction basis.

- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

  The majority of the forms are required on a per mortgage transaction basis and, as a result, are likely to be time sensitive, requiring respondents to respond in fewer than 30 days to meet the lender's internal deadlines and/or closing deadlines.

- **requiring respondents to submit more than an original and two copies of any document;**

  Not applicable.

- **requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

  Not applicable.

- **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;**

  Not applicable.

- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

  Not applicable.

- **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**

  Not applicable.

- **requiring respondents to submit proprietary trade secrets, 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.**

Not applicable.

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.**

   - **Describe efforts to consult with people 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**.

     HUD published a Notice of Proposed Information Collection for Public Comments in the *Federal Register*, Volume 90; No. 113; Page 25068 on Friday June 13, 2025. The public was given until August 12, 2025, to submit comments on the proposed information collection. There was 1 public comment received and it is discussed here:

     60-Day Public Comments and Response

     Summary. The commenter urged HUD to ensure funds are used properly for home improvements, maintenance or construction intended and not include financial institutions or services as part of the contract.
     HUD Response: HUD appreciates the commenter's suggestion concerning the intended use of funds in contracts. Certain contracts are required to be filled by the lender to ensure loan funds were properly used, in particular construction and rehabilitation loans.

   - **Consultations 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.**

     Not applicable.

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

   No payments or gifts to respondents are provided.

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.**

This collection does not require a SORN or a PIA. No assurances of confidentiality are provided to the respondents.

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 people from whom the information is requested, and any steps to be taken to obtain their consent.**

The information collected does not contain questions of a sensitive nature.

12. **Provide estimates of the hour burden of the collection of information.**

The estimated total number of respondents for all forms included in this collection is 6,400. Four of the forms (HUD 50097, HUD 50111, HUD 50131 and HUD 50175) are prepared by a single respondent (participating program lender) on a per loan basis. The annual loan volume estimate is 3,750 loans. The estimated total responses for the collection is 26,104, which represents the estimated total number of all forms used each year. The total annual burden of this collection is expected to be 2,701.41 hours. The total estimated annual cost for this information collection is $78,639.83.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Lender Reservation of Funds Request HUD-50097	3,750	1	3750	0.08	300	$25.25	$7,575
Lender Assurance of Completion HUD-50098	350	1.00	350	0.05	17.5	$25.25	$441.88
Single Close Construction Rehab Acknowledgement HUD-50101	350	1.00	350	0.03	10.5	$25.25	$265.13
Condominium Loan Level Single-Unit Approval Questionnaire HUD-50102	100	1.00	100	0.13	13	$25.25	$328.25
Extension of Time Request HUD-50103	150	1.00	150	0.25	37.5	$42.21	$1,582.88
Exceed Cost limit for PPP Request HUD-50104	150	1.00	150	0.25	37.5	$42.21	$1,582.88
Compliance	350	1.00	350	0.25	87.5	$37.37	$3,269.88

Inspection Report HUD-50105							
Mortgage Record Change HUD-50106	100	1	100	0.25	25	$25.25	$631.25
Builders Certification of Plans, Specs and Site HUD-50107	350	1	350	0.25	87.5	$25.25	$2,209.38
Pre-foreclosure Sale Program Request for Variance HUD-50108	25	1	25	0.25	6.25	$42.21	$263.81
Request for Acceptance of Changes Approved Drawings and Specifications HUD-50109	175	1	175	0.50	87.5	$25.25	$2,209.38
Addendum to Uniform Residential Loan Application HUD-50111	3,750	1	3,750	0.13	487.5	$25.25	$12,309.38
Tribal Land Status Jurisdiction HUD-50114	450	1	450	0.03	13.5	$22.32	$301.32
Loan Guarantee Fee Refund Request HUD-50129	100	1	100	0.33	33	$25.25	$833.25
Case Number Request Form HUD-50131	3,750	1	3,750	0.08	300	$25.25	$7,575
Section 184 MCAW HUD-50175	3,750	1	3,750	0.17	637.5	$25.25	$16,096.88
Forms Approved in 2024							
Section 184 Tribal Application HUD-50172	6	1	6	0.33	1.98	$22.32	$44.19
Section 184 Tribal Annual Recertification HUD-50171	226	1	226	0.17	38.42	$22.32	$857.53
Section 184 Borrower’s Authorization of Tribal Notification HUD-50177	3,750	1	3,750	0.05	187.5	$42.21	$7,914.38
Section 184/184A	3,750	1	3,750	0.05	187.5	$42.21	$7,914.38

Borrower's Identity of Interest and Conflict of Interest Certification HUD-50173							
Section 184 Lender Application HUD-50178	32	1	32	0.08	2.56	$42.21	$108.06
Section 184/184A Lender Annual Recertification HUD-50174	150	1	150	0.25	37.5	$42.50	$1,593.75
Section 184/184A Warranty of Completion HUD-50176	350	1	350	0.03	10.5	$42.21	$443.21
Section 184 Notice of Conveyance of Deed to HUD HUD-50179	115	1	115	0.33	37.95	$42.21	$1,601.87
Section 184 Pre-Foreclosure Sale Program Agreement HUD-50180	25	1	25	0.15	3.75	$42.21	$158.29
Section 184 Pre-Foreclosure Sale Program Sales Contract Review HUD-50170	25	1	25	0.25	6.25	$42.21	$ 263.81
Section 184 Pre-Foreclosure Sale Program Closing Worksheet HUD-50169	25	1	25	0.25	6.25	$42.21	$ 263.81
TOTAL	**26,104**		**26,104**		**2,701.41**		**$78,639.83**

To estimate the hourly cost per respondent, HUD used the Department of Labor Bureau of Labor Statistics' most recent (May 2025) mean hourly wage information on loan interviewer and clerks ($25.25), construction and building inspector ($37.37), compliance officer ($42.50), office clerk ($22.32), and loan servicing officer ($42.41) found at List of SOC Occupations.

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).**

    There are no additional costs to respondents other than what is reported in Items 12 and 14.

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 expenses 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 annualized cost to the Federal Government is based on the hourly rate of $58.35, of the 2026 General Pay Scale for a GS 13 Step 1 in the Washington, D.C., Baltimore, MD, and Arlington, VA localities, which represents the staff of HUD's Office of Loan Guarantee (OLG). The office primarily administers the Section 184 and Section 184A Programs. We estimate the total hours of staff time processing the forms to be approximately 2,588.91 hours annually, multiplied by hourly rate totals approximately $151,062.98.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Lender Reservation of Funds Request HUD-50097	3,750	1	3750	0.05	187.5	$58.35	$10,940.63
Lender Assurance of Completion HUD-50098	350	1.00	350	0.05	17.5	$58.35	$1,021.13
Single Close Construction Rehab Acknowledgement HUD-50101	350	1.00	350	0.03	10.5	$58.35	$612.68
Condominium Loan Level Single-Unit Approval Questionnaire HUD-50102	100	1.00	100	0.13	13	$58.35	$758.55
Extension of Time Request HUD-50103	150	1.00	150	0.25	37.5	$58.35	$2,188.13
Exceed Cost limit for PPP Request HUD-50104	150	1.00	150	0.25	37.5	$58.35	$2,188.13
Compliance Inspection Report HUD-50105	350	1.00	350	0.25	87.5	$58.35	$5,105.63
Mortgage Record Change HUD-50106	100	1	100	0.25	25	$58.35	$1,458.75
Builders Certification of Plans, Specs and Site HUD-50107	350	1	350	0.25	87.5	$58.35	$5,105.63
Pre-foreclosure	25	1	25	0.25	6.25	$58.35	$364.69

Sale Program Request for Variance HUD-50108							
Request for Acceptance of Changes Approved Drawings and Specifications HUD-50109	175	1	175	0.50	87.5	$58.35	$5,105.63
Addendum to Uniform Residential Loan Application HUD-50111	3,750	1	3,750	0.13	487.5	$58.35	$28,445.63
Tribal Land Status Jurisdiction HUD-50114	450	1	450	0.03	13.5	$58.35	$787.73
Loan Guarantee Fee Refund Request HUD-50129	100	1	100	0.33	33	$58.35	$1,925.55
Case Number Request Form HUD-50131	3,750	1	3,750	0.08	300	$58.35	$17,505.00
Section 184 MCAW HUD-50175	3,750	1	3,750	0.17	637.5	$58.35	$37,198.13
Forms Approved in 2024							
Section 184 Tribal Application HUD-50172	6	1	6	0.33	1.98	$58.35	$115.53
Section 184 Tribal Annual Recertification HUD-50171	226	1	226	0.17	38.42	$58.35	$2,241.81
Section 184 Borrower's Authorization of Tribal Notification HUD-50177	3,750	1	3,750	0.05	187.5	$58.35	$10,940.63
Section 184/184A Borrower's Identity of Interest and Conflict of Interest Certification HUD-50173	3,750	1	3,750	0.05	187.5	$58.35	$10,940.63
Section 184 Lender Application HUD-50178	32	1	32	0.08	2.56	$58.35	$149.38
Section 184/184A Lender Annual Recertification	150	1	150	0.25	37.5	$58.35	$2,188.13

HUD-50174							
Section 184/184A Warranty of Completion HUD-50176	350	1	350	0.03	10.5	$58.35	$612.68
Section 184 Notice of Conveyance of Deed to HUD HUD-50179	115	1	115	0.33	37.95	$58.35	$2,214.38
Section 184 Pre-Foreclosure Sale Program Agreement HUD-50180	25	1	25	0.15	3.75	$58.35	$218.81
Section 184 Pre-Foreclosure Sale Program Sales Contract Review HUD-50170	25	1	25	0.25	6.25	$58.35	$364.69
Section 184 Pre-Foreclosure Sale Program Closing Worksheet HUD-50169	25	1	25	0.25	6.25	$58.35	$364.69
TOTAL	**26,104**		**26,104**		**2,588.91**		**$151,062.98**

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

    This collection is a reinstatement with change of a previously approved collection. With respect to the Section 184 Program, these forms are consistent with the requirements set forth in 24 CFR Part 1005. All the forms are new to the Section 184 Program. HUD-50097, HUD-50098, HUD-50101, HUD-50102, HUD-50103, HUD-50104, HUD-50105, HUD-50106, HUD-50107, HUD-50108, HUD-50109, HUD-50111, HUD-50114, HUD-50129, HUD-50131, and HUD-50175. All other forms referenced in the collection remain active and unchanged.

    With respect to the Section 184A Program, these forms are currently being used by the program either under an expired PRA or the program has been using FHA equivalents. Thus, there is no change in what is required from Section 184A lenders.

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.**

    Not Applicable

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**.

Not Applicable

18. **Explain each exception to the certification statement identified.**

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.