

Supporting Statement for Paperwork Reduction Act Submissions

INFORMED CONSUMER CHOICE DISCLOSURE AND APPLICATION FOR HUD/FHA INSURED MORTGAGE OMB #2502-0059

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 seeks to revise the OMB approval of 2502-0059. Section 203 of the National Housing Act (P.L. 479, 48 Stat. 1246, 12 U.S.C. 1702 et seq.) authorizes the Secretary of HUD, upon application by the lender, to insure mortgages offered to him, which are eligible for insurance. Regulations codified at 24 CFR 203.1 through 203.681 detail the requirements pertinent to HUD's single family mortgage insurance programs, i.e., the eligibility requirements and underwriting procedures, which are determined by the documents included in this package.

Regulations at 24 CFR Part 203 entitled Single Family Mortgage Insurance specify the requirements for making application and obtaining loan approval for a HUD-insured mortgage loan. The Uniform Residential Loan Application (URLA) created by Fannie Mae and Freddie Mac, and its use for mortgage applications is standardized throughout the mortgage industry. FHA's addendum form HUD-92900-A is combined with the URLA to constitute FHA's standard application for insurance of the mortgage called for at 24 CFR 203.255 of the regulations. Every mortgage application for insurance is used to determine eligibility in three general areas: (1) the proposed loan under the statute, i.e., term, mortgage amount, and ratios of loan-to-value or replacement cost; (2) the property with respect to compliance with HUD/FHA statutory and regulatory requirements; (3) and the proposed mortgage debt, including the borrower's ability to repay. FHA relies on the information provided to determine eligibility of the mortgage for FHA's insurance endorsement.

Without the information provided by the URLA, HUD-92900-A, HUD-92900-B, HUD-92544, and HUD-92900-LT, HUD would have difficulty in determining eligibility and, consequently, the insurance fund for the single-family mortgage insurance programs would be placed in jeopardy. The information in the Informed Consumer Choice Notice is used by prospective mortgagees to disclose if mortgage products, other than FHA mortgage insurance for which the mortgagor qualifies, result in lower costs to the mortgagor over the life of the mortgage. The Pre-Insurance Review is used by mortgagees participating in the Lender Insurance program to determine if the loan meets HUD's requirements for FHA insurance.

This renewal also incorporates revisions from the prior Supporting Statement:

- A requirement for the Fannie Mae/ Freddie Mac Form 1103, Supplemental Consumer Information Form (SCIF). The SCIF addendum, as required by Fannie Mae and Freddie

Mac, the GSE's, was designed to collect borrower language preferences and any homeownership education and housing counseling the borrower may have received. Evidence that the SCIF form was provided to borrowers is required by the GSE's. Providing evidence of the SCIF form was adopted at HUD's discretion and not required by statute, and has been removed from HUD's guidance.

- Removal of the requirement to provide form HUD-92900-B Important Notice to Homebuyers. This form contained incorrect information regarding borrower prepayment and eligibility for Up Front Mortgage Insurance Premium refunds. This disclosure is not required by statute and has been removed from HUD's guidance.
- For borrowers with an existing FHA Partial Claim (PC), lenders were required to disclose the terms of the PC and repayment options when refinancing the FHA first lien. Documentation of this disclosure is not required by statute and has been removed from HUD's guidance.
- Additional burdens are added for the reporting of flood insurance information. Overall, the reporting burden was not adversely impacted as a result of this requirement.

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.

Lenders obtain information from borrowers in the normal course of business. This information is captured on the URLA and documented in the loan origination file. Lenders then report information to FHA for the purpose of obtaining mortgage insurance. While borrowers must meet certain requirements established by FHA to qualify for the insurance, lenders bear less risk because FHA will pay the lender if a homeowner defaults on his or her loan.

The specific items of this information collection are as follows:

- a. The URLA and **form HUD-92900-A** (HUD Addendum to URLA) are used in every case by the lender to make application for FHA mortgage insurance. Together they describe the parties involved, the property, and the conditions and terms on which the mortgage insurance will be based.
- b. Documentation to make certain the borrowers have the credit and capacity to repay the debt, including, but not limited to, credit reports and credit scores; verification of income and employment; government assistance; rental income; housing and clothing allowances, hazard pay, rations and proficiency pay; alimony, child support or maintenance income; subsidy for mortgage payments; VA benefits; IRS tax forms; and/or trust agreements. This data for credit and capacity are normal business practices used by all lenders as part of the lending business. The collection of this information is typical in the lending industry and not specific to FHA-insured mortgages.

- c. Asset verification documents are required for every case and are used to make certain the borrowers are eligible, have capacity to repay the debt and assets for the down payment and closing costs. Asset verification documents may include but are not limited to documents required for changes to property title; gift letters; bank account statements from borrowers and/or gift donors; attorney opinion letters; cancelled checks; bills of sale; proof of ownership and value; final HUD-1 or Closing Disclosures for the sale of property; receipt of earnest money deposit; evidence that a retirement account can be liquidated at any time; sweat equity documentation; and/or lease-purchase agreements.
- d. For determining borrower eligibility for mortgage insurance for disaster victims [Section 203(h)], documentation is required evidencing a permanent residence in a disaster area as well as documentation evidencing that the property was damaged to such an extent that reconstruction is necessary.
- e. For purchase transactions where the sales contract does not contain a provision that there are no other agreements between the parties and that the terms of the sales contract constitute the entire agreement between the parties, a certification from the borrower, seller and the selling real estate agent or broker involved in the transaction must be obtained stating that the terms and conditions of the sales contract are true to the best of their knowledge and belief and that any other agreement entered into by any of the parties in connection with the real estate transaction is part of, or attached to, the sales agreement. A similar certification is obtained at closing, which also includes a certification from the settlement agent. These certifications are used to ensure that borrowers make the required cash investment from an acceptable source and not directly from a party with an interest in the transaction.
- f. **Form HUD-92561**, Mortgagor's Contract with Respect to Hotel and Transient Use of Property is required on two, three, or four-unit properties to assure that dwellings are used in accordance with program objectives. This form is required when the FHA-insured mortgage will be secured by one of these property types.
- g. **Form HUD-92544**, Warranty of Completion of Construction in Substantial Conformity with Approved Plans and Specifications is used in new construction cases only. The form is called for when the subject property is determined to be new construction.
- h. **Form HUD-92900-LT**, FHA Loan Underwriting and Summary Transmittal simplifies lender reporting of new loans to HUD for FHA insurance. The format is consistent with industry business practices and does not require lenders to maintain and support a separate process for reporting new loans to FHA.

The transmittal form reflects an emphasis on reporting critical data elements and loan characteristics to FHA that assist in evaluating risk rather than reporting how the mortgage amount and cash investment were calculated. Eliminating the mortgage

amount and cash investment calculations from the Loan Underwriting and Transmittal Sheet does not eliminate the requirement to perform these calculations in accordance with applicable guidelines. It simply eliminates reporting on a specific form how the mortgage amount and cash investment were calculated for each loan. Lenders are expected to clearly document in the loan origination file how they performed these calculations in accordance with outstanding instructions.

- i. The **Mortgagor Notice of Intent** to satisfy occupancy requirements upon discharge from the military is required of military personnel by 24 CFR 203.31 if a family member as described in the National Housing Act §201(e) (12 U.S.C. 1707) will not occupy the subject property as their primary residence. The Borrower must provide military orders evidencing active duty status 100 miles or more from the property, and a statement of intent to occupy the subject upon discharge from military service. Borrowers on mortgages of all types are required to indicate the intended occupancy of the subject property; therefore no additional burden hours are attributed to this requirement.
- j. The **Model Notice for the Informed Consumer Choice Disclosure** is used by lenders to provide a one-page analysis of other mortgage products offered by that lender for which the borrower would qualify, as compared to the FHA-insured loan. The comparison includes note rates, associated interest payments, insurance premiums, and other costs and fees over the life of the various loan products. The model notice also includes a statement regarding when the mortgagor's requirement to pay mortgage insurance premiums for the FHA-insured loan would terminate or a statement that the requirement will terminate only if the mortgage is refinanced, paid off, or otherwise terminated. Delivery of this disclosure is a function of the Mortgagee at their discretion per 24 CFR 203.10. Lenders are not required to report to HUD the number of disclosures released annually.
- k. The **Pre-Insurance Review** provides lenders who are participating in the Lender Insurance Program with an example of what HUD staff reviews prior to endorsing a mortgage for insurance. As a condition of participating in Lender Insurance, lenders (not HUD staff) are responsible for completing the pre-insurance review to ensure that the loan is in compliance with all applicable HUD requirements. The Pre-Insurance Review requirements are located in HUD's Handbook 4000.1 section II.A.7.b, available online at: <https://www.hud.gov/sites/dfiles/OCHCO/documents/40001-hsgh-update16.pdf>.
- l. The **Settlement Certification** (previously known as Addendum to HUD-1) is signed by the buyer, seller, the selling real estate agent or broker involved in the transaction and closing agent for each FHA purchase transaction. The form requires the buyer seller and real estate agent/broker to certify that there are no undisclosed loans outside of the transaction. The closing agent certifies that the closing disclosure is an accurate accounting of funds received and disbursed for the transaction.

- m. For **Mortgages that secure a property in a flood zone**, FHA will collect new data about the flood insurance policy, including the insurer, amount of coverage, and the source used to determine property value. This information assists HUD in assuring that properties with flood risk have adequate flood insurance. HUD ascribes no additional burden hours for this because this information is already collected by mortgagees as part of their normal residential lending business.

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.

Each application request has its own unique characteristics of property, mortgage amount, and borrower; therefore, the use of computers can only be applied to the storage and retrieval of reference information and not to the burden-reduction aspect. However, data entry on these forms is increasingly generated by proprietary loan origination systems (LOS), if purchased or licensed by the lender, with much of that information provided electronically to HUD. HUD accepts case binders electronically. Currently, all case binders are now submitted in this manner. HUD forms are available online at <http://www.hudclips.org>.

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.

No duplication exists because each application is unique to the eligibility requirements explained in Item 2 above. The information collected in this Supporting Statement is not collected elsewhere and no similar information exists

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

The information collected does not have a significant economic impact on a substantial number of 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 reporting burden is loan-specific and, thus, cannot be conducted less frequently than on every single loan submitted to FHA for insurance endorsement. HUD uses this information to identify origination trends, determine the efficacy of existing policies and establish new policy in order to

protect the MMI fund from potential risks. For the Informed Consumer Choice Notice, only a small percentage of mortgagors will receive this disclosure since it is only applicable when the mortgagor qualifies for both FHA financing *and* prime financing.

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;**

Respondents are required to report information more than quarterly. The reporting burden is loan-specific and, thus, cannot be conducted less frequently than on every single loan submitted to FHA for insurance endorsement.

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

Respondents are not required to prepare a written response in less than 30 days.

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

Respondents are not required to submit more than an original and two copies of any document.

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

Respondents are not required to retain records for more than 3 years. Respondents (mortgagees) must maintain their mortgage file for a period of two years from date of endorsement.

- **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;**

Respondents are not required to provide a statistical survey.

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

Respondents are not required to use statistical data not approved by OMB.

- **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**

Respondents are not required to submit information that includes a pledge of confidentiality that is not supported by authority established in a 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.

- **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.**

Respondents are not required to submit proprietary trade secrets, or other confidential 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.**

HUD regularly receives comments and input on its information collection requirements from lending institutions, the home construction industry, insurance companies, appraisers, and service companies. This is not inconsistent with the guidelines in 5 CFR 1320.6. The agency notice soliciting comments on the information collection for OMB #2502-0059 was published in the Federal Register on September 15, 2025, (Volume 90, Number 176, pages 44388-44389).

Three public comments were received.

One commentator referenced the HUD-92900-B, *Important Notice to Homebuyers* form, citing outdated prepayment information.

Response: HUD reviewed the document and our requirements. The form is not required by statute or regulation, and contains outdated or misleading information. A decision was made to discontinue this form and it has been removed from this collection.

Another commentator asked HUD to consider revising the Informed Consumer Choice Disclosure Notice (Model Notice). The comment cited the required comparison of an FHA to a comparable conventional mortgage and the example of an FHA 95.5% LTV loan to a 95% LTV conventional product.

Response: The Informed Consumer Choice Disclosure is a model form, and lenders may modify this document as needed provided the disclosure continues to meet the statutory and regulatory requirements reflected in the model document. We recognize that some conventional mortgage products, with special borrower or property eligibility criteria, may more closely resemble FHA programs. If those products are available to the borrower, the mortgagee may use them in the model Informed Consumer Choice disclosure to provide a more accurate cost comparison against the FHA mortgage. However, since these types of products in the conventional market have many program-specific nuances that would be almost impossible to replicate in our program, HUD uses the standard 95% LTV for illustration purposes.

The last commentor asked for a settlement of the Federal Old-Age and Survivors Insurance Trust Fund to “..to ensure activities for grants, cooperative agreements, scholarships, contracts of assistance, donation agreements, committees, boards and other related matters.”

Response: The Federal Old-Age and Survivors Insurance Trust Fund is a separate account in the United States Treasury under the authority of the Social Security Administration. As this fund is not under the purview of the Department of Housing and Urban Development, the respondent is encouraged to contact the Social Security Administration directly to make their request and obtain further information.

Additionally, the 30-day notice for comments was published in the Federal Register on October 30, 2026 (Volume 91, Number 209, pages 68537 and 68538). One comment was received.

The commenter request: “I am looking to review the proposed changes to the Informed Consumer Choice Disclosure and Application For HUD/FHA Insured Mortgage (control number 2502-0059).

HUD’s Response: Copies of the Supporting Statement, and all collection forms were provided via email for the commenter’s review.

- **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.**

HUD receives regular comments and input from the mortgage industry via direct contact (email) and the FHA Resource Center. Additional consultation is unnecessary.

- **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.**

HUD receives regular comments and input from the mortgage industry via direct contact (email) and the FHA Resource Center. Additional consultation is unnecessary.

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

There are no gifts or other type payments made to respondents.

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 provided in form HUD-92900-A Section III, "Notice to Borrowers" which establishes the authority for the collection of the information requested and the assurance of confidentiality as established by law. Information regarding the borrower's financial status and income data are only used to determine insurance eligibility. The basis for collecting the borrower's social security number on the form is covered under the Debt Collection Act of 1982, (P.L. 97-365) and is also provided in Section III., "Notice to Borrowers."

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 contains questions of a sensitive nature. The forms described in item 2 collect personally identifiable information (PII). This information is necessary to verify the identity of the borrower, that the borrower meets the eligibility requirements for an FHA-insured mortgage and identifies the property associated with that mortgage. Consent to obtain this information is provided from the borrower with the execution of the URLA and the HUD-92900-A Section III.

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.**

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
HUD-92900-	2045	Varies	827,150	.17			

A, its related exhibits and other forms					140,615.50	\$48.49	\$6,818,445.60
HUD-92900-LT	2045	Varies	827,150	.17	140,615.50	\$48.49	\$6,818,445.60
HUD-92561 (2-4) units	2045	Varies	21,865	.03	655.95	\$48.49	\$31,807.02
HUD-92544 (new construction)	2045	Varies	123,690	.05	6184.50	\$48.49	\$299,886.41
Additional burden for buy down agreements	2045	Varies	1,056	.05	52.80	\$48.49	\$2,560.27
Additional burden for pre-insurance review	2045	Varies	827,150	.17	140,615.50	\$48.49	\$6,818,445.60
Settlement Certification (purchase transactions)	2045	Varies	603,040	.01	6,030.40	\$48.49	\$292,414.10
Flood Insurance	2045	Varies	9,852	.08	788.16	\$48.49	\$38,217.88
TOTALS	2045	Varies	3,240,953		435,558.31		\$21,120,222.45

Table Notes:

1. The total number of respondents (lenders or mortgagees) applying for FHA mortgage insurance is 2045. The number of FHA-approved mortgagees varies; mortgagees seek FHA approval and insurance during times of economic stress, such as during a recession. Mortgagees turn from government insurance to private insurance during times of economic stability.
2. As of the calendar year ending December 31, 2024, the 3-year average of mortgages insured by FHA is 827,150.
3. The hourly cost of \$48.49 is based on a national mean hourly wage of a Credit Analyst (rounded to nearest dollar), reported by the Department of Labor, and includes the cost of overhead, staff support, recordkeeping, etc. See occupation 13-2041 Credit Analyst at https://www.bls.gov/oes/current/oes_nat.htm#13-0000, for May 2025, the most recent data posted as of the preparation of this Supporting Statement.
4. This submission reports a decrease in burden hours. This decrease is primarily due to lower average originations of FHA-insured loans during the prior 3 years, and the removal of obsolete or unnecessary burden requirements. Minor adjustments to burden hours had no negative impact on the time required for the public to comply with FHA origination requirements.

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.

- **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;**

For a lender's participation in FHA's mortgage insurance program, there are no costs for (a) a total capital and start-up cost component (annualized over its expected useful life) or (b) a total operation and maintenance and purchase of services component. Costs for these items are a customary standard part of the lender's business.

- **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.**

Since there are no additional costs for a lender's participation in FHA's mortgage insurance program, there are no reportable cost estimates that may be 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.**

Since there are no additional costs for a lender's origination for participation in FHA's mortgage insurance program, there are no reportable estimates that include purchases or equipment or services or a portion thereof. Costs for these items are a customary and usual for a lending business practice.

- 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	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
HUD-92900-A, its related exhibits and other forms	2045	Varies	827,150	0.17	140,615.50	\$49.07	\$6,900,002.59
HUD-92900-LT	2045	Varies	827,150	0.17	140,615.50	\$49.07	\$6,900,002.59
HUD-92561 (2-4) units	2045	Varies	21,865	0.03	655.95	\$49.07	\$32,187.47
HUD-92544 (new construction)	2045	Varies	123,690	0.05	6,184.50	\$49.07	\$30,347.34
Additional burden for buydown agreements	2045	Varies	1,056	0.05	52.80	\$49.07	\$2,590.89
Additional burden for pre-insurance review	2045	Varies	827,150	0.17	140,615.50	\$49.07	\$6,900,002.58
Settlement Certification (purchase transactions)	2045	Varies	603,040	0.01	6,030.40	\$49.07	\$295,911.73
Flood Insurance	2045	Varies	9,852	0.08	788.16	\$49.07	\$38,675.01
TOTALS	2045	Varies	3,240,953				

					435,558.31		\$21,099,720.20
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The annualized cost to the Federal government is estimated at 10% of the total burden hours or 43,555.83. The Federal burden includes compliance reviews related to the loans. The annualized cost to the Federal government assumes a rate of \$49.07 based on the hourly wage of for a GS-12, Step 1 employee found at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2025/locality-pay-area-definitions/>.

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

This is a renewal of a currently approved collection. The renewal reflects an overall decrease of FHA-insured mortgages. This decrease can be attributed to a rising interest rate market; rates over the past three years have almost doubled when compared to the COVID-era interest rates, averaging near 7 percent. Historically, higher interest rates lead to a reduction in the refinance market throughout the entire lending industry and is not specific to the FHA loan market. The prior renewal of this collection reported that over 50% of the average originations could be ascribed to refinance transactions, while this renewal reflects that less than 30% of the current average of originations are refinances.

Additionally, the burdens charts have been revised to align the hours per response with the associated HUD forms to ensure the total reported burden to both the public and the government are accurate.

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.

This information collection does not include results that will be published.

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 expiration date of the OMB approval.

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

This collection of information does not employ statistical methods.