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Comment Submitted by Anonymous

Posted by the **Federal Emergency Management Agency** on Oct 6, 2026

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Comment

FEMA claims Part III lacks utility, yet a binding schedule of expected disbursements is standard financial prudent practice for multi-year debt instruments. Please explain why the schedule lost utility, or to provide data on how often Part III projections matched actual drawdowns, violates the agency's duty under 5 CFR § 1320.8(a)(4) to demonstrate that the collection has been designed to maximize the practical utility of the information created. From my limited understanding, removing the disbursement schedule from the primary security instrument (the Promissory Note) impedes the Treasury's and OMB's ability to model cash flows and estimate loan subsidy costs accurately. FEMA shouldn't prioritizing minor administrative convenience for applicants over the federal government's statutory obligation under FCRA to maintain standardized cash flow projections for federal direct loans.

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