



**National Association
of Federal Credit Unions**

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Arlington, VA 22201-2149

NAFCU | Your Direct Connection to Education, Advocacy & Advancement

July 14, 2015

Colette Pollard
Reports Management Officer, QDAM
Department of Housing and Urban Development
451 7th Street SW, Room 4176
Washington, DC 20410-5000

RE: Notice of Proposed Information Collection: Application for FHA Insured Mortgages
(Docket No. FR-5835-N-06)

Dear Ms. Pollard:

On behalf of the National Association of Federal Credit Unions (NAFCU), the only national trade association focusing exclusively on federal issues affecting the nation's federally insured credit unions, I am writing to you regarding the notice seeking public comment by the U.S. Department of Housing and Urban Development (HUD) on its proposed revisions to the "HUD Addendum to Uniform Residential Loan Application" (Form 92900-A). *See* 80 FR 27998 (May 15, 2015). NAFCU supports the proposed revisions, as they would render the form more efficient and practical for both lenders and borrowers. However, NAFCU urges HUD to be mindful of the impending effective date of the *Truth in Lending Act* (TILA) and *Real Estate Settlement Procedures Act* (RESPA) Integrated Disclosure (TRID) Rule and provide credit unions with sufficient time to implement the revised form.

NAFCU supports HUD's development of an updated version of Form 92900-A, which is used to determine whether a borrower in a proposed mortgage transaction is eligible for the Federal Housing Administration's (FHA's) insurance endorsement. Some of the proposed revisions to the form include eliminating references to outdated handbooks, updating the form to include the most current non-discrimination language, differentiating between the initial and final Uniform Residential Loan Applications, and replacing outdated language regarding acceptable sources of funds. Credit unions consistently strive to provide members with useful and accurate information; up-to-date materials are essential to furthering that goal. NAFCU applauds HUD's initiative to update inaccurate and outdated government forms, as the proposed revisions to Form 92900-A will help credit unions provide members with the most current information available.

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NAFCU recommends that HUD minimize the compliance burden on credit unions by making the effective date of the updated HUD Form consistent with the effective date of the TRID Rule. The Consumer Financial Protection Bureau (CFPB) recently proposed to delay the effective date of the TRID Rule from August 1, 2015, to October 3, 2015. NAFCU has filed a comment letter in support of this proposal, and arguing that the extension will benefit both credit unions and consumers by providing for a smoother implementation of the new disclosure requirements. NAFCU and its members believe that delaying the effective date of the HUD Form to October 3, 2015, will provide credit unions with uniformity and avoid unintended consequences.

HUD's effort to provide clear guidelines coupled with an implementation date consistent with the TRID Rule will afford credit unions the opportunity to work with borrowers in a way that minimizes confusion and the already overwhelming regulatory burden on credit unions. Therefore, NAFCU and our members strongly support the proposed revisions.

NAFCU appreciates the opportunity to share its thoughts on the proposed revisions to Form 92900-A. Should you have any questions or concerns, please feel free to contact me at amonterrubio@nafcu.org or (703) 842- 2244.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alexander Monterrubio', with a horizontal line extending to the right.

Alexander Monterrubio
Regulatory Affairs Counsel