



**National Association  
of Federal Credit Unions**

3138 10th Street North  
Arlington, VA 22201-2149

NAFCU | Your Direct Connection to Education, Advocacy & Advancement

September 30, 2015

HUD Desk Officer  
Office of Management and Budget  
New Executive Office Building  
Washington, DC 20503

RE: Notice of Proposed Information Collection: Application for FHA Insured Mortgages  
(Docket No. FR-5831-N-39)

Dear Sir or Madam:

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 second 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 52783 (September 1, 2015). NAFCU commends HUD for incorporating the industry's suggestions into the current version and recommends the Department continue to update its forms with the goal of eliminating the burden caused by duplicative and confusing paperwork.

NAFCU supports HUD's second revision 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. NAFCU also appreciates HUD's acknowledgement of the competing priorities facing credit unions as we approach the October 3 implementation date of the *Truth in Lending Act* (TILA) and *Real Estate Settlement Procedures Act* (RESPA) Integrated Disclosure (TRID) Rule. Over the coming months, financial institutions will be working diligently to overcome the inevitable growing pains of the onerous and complex framework created by the TRID Rule. Accordingly, NAFCU believes HUD's estimated November 2015 implementation date for the revised Form 92900-A provides credit unions with adequate time to implement the amended form.

HUD's continued efforts to improve the clarity of its forms will allow credit unions to continue to work with borrowers in a manner that minimizes both confusion and regulatory burden. NAFCU appreciates the opportunity to share its thoughts on the proposed revisions to Form

HUD Desk Officer  
Office of Management and Budget  
September 30, 2015  
Page 2 of 2

92900-A. Should you have any questions or concerns, please feel free to contact me at [amonterrubio@nafcu.org](mailto:amonterrubio@nafcu.org) or (703) 842- 2244.

Sincerely,

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

Alexander Monterrubio  
Regulatory Affairs Counsel