U.S. Department of Housing and Urban Development, Office of Single Family Housing

FHA Loans to Delinquent Federal Tax Debtors

Office of Audit, Region 7
Kansas City, KS

Audit Report Number: 2019-KC-0003
September 30, 2019

To: Gisele Roget
Deputy Assistant Secretary for Single Family Housing, HU

//**signed**//

From: Ronald J. Hosking
Regional Inspector General for Audit, 7AGA

Subject: FHA Insured at Least $13 Billion in Loans to Ineligible Borrowers With Delinquent Federal Tax Debt

Attached is the U.S. Department of Housing and Urban Development (HUD), Office of Inspector General's (OIG) final results of our review of Federal Housing Administration (FHA)-insured loans to delinquent Federal tax debtors.

HUD Handbook 2000.06, REV-4, sets specific timeframes for management decisions on recommended corrective actions. For each recommendation without a management decision, please respond and provide status reports in accordance with the HUD Handbook. Please furnish us copies of any correspondence or directives issued because of the audit.

The Inspector General Act, Title 5 United States Code, section 8M, requires that OIG post its publicly available reports on the OIG website. Accordingly, this report will be posted at https://www.hudoig.gov.

If you have any questions or comments about this report, please do not hesitate to call me at 913-551-5870.

Audit Report Number: 2019-KC-0003
Date: September 30, 2019

FHA Insured at Least $13 Billion in Loans to Ineligible Borrowers With Delinquent Federal Tax Debt

Highlights

What We Audited and Why

We audited Federal Housing Administration (FHA)-insured loans from fiscal year 2018. We worked with the Treasury Inspector General for Tax Administration (TIGTA) to identify the number of FHA-insured loans made to borrowers with delinquent Federal tax debt. We initiated this audit because a prior U.S. Government Accountability Office (GAO) audit found that FHA insured mortgages for borrowers with Federal tax debt (GAO-12-592). Our audit objective was to determine whether FHA provided insurance on loans that were made to ineligible, delinquent Federal tax debtors.

What We Found

In fiscal year 2018, FHA insured at least 56,376 loans worth $13 billion, which were not eligible for insurance because they were made to borrowers with delinquent Federal tax debt. In addition, it insured another 57,918 loans worth $14.3 billion to borrowers who had delinquent taxes and payment plans with the Internal Revenue Service (IRS) but may not have met FHA's requirement for 3 months of payments on the payment plans. We were not able to determine the eligibility of these loans because we did not have information showing whether these borrowers completed 3 months of payments on their payment plans.

What We Recommend

We recommend that FHA require lenders to obtain the borrowers' consent to verify the existence of delinquent Federal taxes with the IRS during loan origination and deny any applicant with delinquent Federal tax debt not meeting FHA requirements. We also recommend that FHA revise its handbooks to reflect that tax liens and judgments are no longer reported on credit reports and for uniform treatment of delinquent tax debt for forward and reverse mortgages.

Table of Contents

Background and Objective

The Federal Housing Administration (FHA) provides mortgage insurance for loans made by FHA-approved lenders throughout the United States and its territories. FHA mortgage insurance protects lenders against losses from homeowners' defaulting on their mortgage loans. The lenders bear less risk because FHA will pay a claim to the lender if a homeowner defaults on his or her loan. Loans must meet FHA requirements to qualify for insurance coverage. The overall management and administration of the FHA single-family mortgage insurance program is the responsibility of the U.S. Department of Housing and Urban Development's (HUD) Office of the Deputy Assistant Secretary for Single Family Housing.

In fiscal year 2018, FHA insured more than 1 million mortgages for single-family homes, and nearly 83 percent of FHA purchase mortgages served first-time home buyers. In addition, the agency insured more than 48,000 reverse mortgages through the Home Equity Conversion Mortgage program, helping seniors remain in their homes and age in place.

In 2012, a U.S. Government Accountability Office (GAO) audit report, GAO-12-592, found that FHA insured more than $1.44 billion in mortgages for 6,327 borrowers with $77.6 million in Federal tax debt. The GAO audit was limited to borrowers who benefited from the American Recovery and Reinvestment Act by either obtaining a loan under FHA's increased loan limits or claiming first-time-home-buyer credits. In addition, GAO found that Recovery Act borrowers with unpaid taxes had foreclosure rates two to three times greater than borrowers without unpaid taxes, which potentially represented an increased risk to FHA. GAO recommended that HUD consult with the Internal Revenue Service (IRS) to develop written policies requiring lenders to collect and evaluate IRS documentation appropriate for identifying ineligible applicants with unpaid Federal taxes. This recommendation was closed after HUD consulted with the IRS and decided against requiring lenders to verify with the IRS whether borrowers had delinquent Federal tax debts. GAO also recommended that HUD provide FHA lenders with revised policies or additional guidance on borrower ineligibility due to delinquent Federal debts to provide reasonable assurance that ineligible borrowers do not receive FHA mortgage insurance. This recommendation was closed after HUD published additional guidance for lenders, which stated that borrowers with delinquent Federal tax debt or liens were not eligible for an FHA-insured mortgage until the delinquent account was brought current, paid, or otherwise satisfied or a satisfactory repayment plan was made between the borrower and the Federal agency owed.

The IRS makes taxpayer data available through several different delivery methods. One of these, the Income Verification Express Service program is used by mortgage lenders and others within the financial community to confirm the income of a borrower during the processing of a loan application. The IRS provides account information generally within 2 to 3 business days to a third party with the consent of the taxpayer. The transcript information is delivered to a secure mailbox based on information received from a Form 4506-T for a $2.00 fee. This service replaced the previous process that required manual pick-up and delivery of transcripts from the IRS Return and Income Verification Services units located across the country and automates the delivery portion of the process. In addition, taxpayers can obtain their own record of account transcript at no charge from the IRS website.

FHA Handbooks 4000.1 and 4235.1 prohibit borrowers with delinquent Federal tax debt from being approved for a mortgage unless the delinquent account is paid or a satisfactory repayment plan exists. For forward mortgages, borrowers with unpaid tax debt are eligible only if they have made timely payments for at least 3 months. For reverse mortgages, a satisfactory repayment plan must be verified in writing. These Handbooks instruct lenders to check public records and credit information to verify that borrowers are not presently delinquent on any Federal tax debt and do not have a tax lien against their property.

The Treasury Inspector General for Tax Administration (TIGTA) provides independent oversight of matters of the U.S. Department of the Treasury involving activities of the IRS, the IRS Oversight Board, and the IRS Office of Chief Counsel. Although TIGTA is placed organizationally within the U.S. Department of the Treasury and reports to the Secretary of the Treasury and to Congress, it functions independently from all other offices and bureaus within the Department. Its mission is to provide quality, professional audit, investigative, and inspection and evaluation services that promote integrity, economy, and efficiency in the administration of the Nation's tax system.

Our objective was to determine whether FHA provided insurance on loans that were made to ineligible, delinquent Federal tax debtors.

Results of Audit

Finding: FHA Insured at Least $13 Billion in Loans to Ineligible Borrowers With Delinquent Federal Tax Debt

In fiscal year 2018, FHA insured more than 56,000 loans worth $13 billion, which were not eligible for insurance because they were made to borrowers with delinquent Federal tax debt. This condition occurred because FHA had inadequate procedures to identify ineligible tax debtors applying for FHA loans. As a result, FHA did not achieve the Office of Management and Budget's (OMB) policies for Federal credit programs, and the FHA insurance fund was exposed to greater risk.

Loans Were Made to Ineligible Borrowers

FHA provided insurance on loans that were made to borrowers reported by the IRS as having delinquent Federal tax debt. In fiscal year 2018, FHA insured more than 56,000 loans worth $13 billion to these ineligible borrowers. OMB Circular A-129 prohibits loans to Federal tax debtors. Specifically, it states that applicants with unresolved delinquent Federal tax debt are not eligible to receive federally insured loans. FHA's policy handbooks state that borrowers with delinquent Federal tax debt are ineligible unless the borrowers have valid repayment agreements with the IRS. The forward mortgage handbook requires borrowers under repayment plans to have made timely payments for at least 3 months of scheduled payments, while the reverse mortgage handbook is silent on this issue (appendix C).

We worked with the Treasury Inspector General For Tax Administration (TIGTA) to identify the number of ineligible loans. We provided TIGTA loan-level data for the more than 1 million FHA loans endorsed in fiscal year 2018. TIGTA matched the Social Security numbers associated with these loans to IRS tax data and identified 114,294 (11 percent) loans for which at least one individual associated with the loan had a delinquent Federal tax debt as of the loan closing date. These loan recipients owed more than $1 billion in delinquent Federal tax debt. Of the loans made to delinquent Federal tax debtors, 56,376 loans worth $13 billion were made to individuals who did not have an active payment plan as of the loan closing date and, therefore, were not eligible to obtain an FHA-insured loan. The remaining 57,918 loans worth $14.3 billion were made to individuals who had payment plans but may not have met FHA's requirement for 3 months of payments. TIGTA was unable to provide us with information that would allow us to determine if these borrowers completed 3 months of payments on the payment plans. Therefore, at least $13 billion in loans was ineligible for insurance, but as much as $27.3 billion might have been ineligible. See appendix D for additional data.

FHA Had Inadequate Procedures

FHA had inadequate procedures to identify ineligible tax debtors applying for FHA loans.

FHA did not require lenders to obtain borrowers' consent to verify the existence of delinquent Federal taxes on Form 4506-T. This form is processed by the IRS to disclose the borrowers' tax status and requires the borrowers' consent. While FHA instructed lenders that borrowers with delinquent Federal tax debt were ineligible unless the borrowers had valid repayment agreements meeting certain conditions, its underwriting requirements did not require the lenders to obtain borrowers' consent so they could contact the IRS to determine each borrower's tax status.

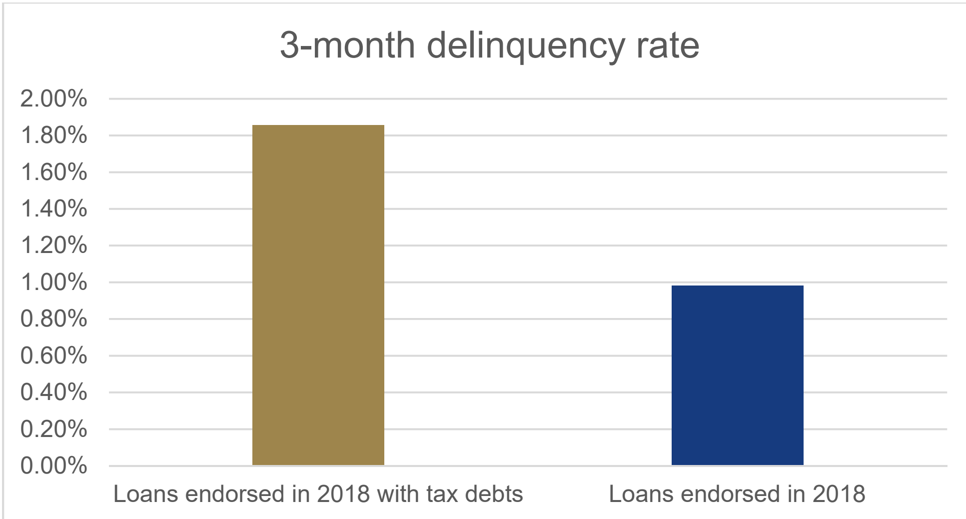
FHA did require that lenders use credit bureaus as a screening tool, as required by the circular and use HUD's Credit Alert Verification Reporting System (CAIVRS) as an additional screening tool, as encouraged by the circular. It also required that lenders check public records. However, those methods for verifying delinquent Federal tax debts were ineffective because delinquent Federal tax debts are not always disclosed in credit reports, CAIVRS, or public records. In March 2011, the IRS doubled the dollar threshold of the delinquent tax amount, for which a notice of Federal tax lien is generally issued, from $5,000 to $10,000. The implication of this IRS decision was that a check of public records would not reveal a Federal tax lien for less than $10,000. This change would allow tax debts below $10,000 to go undiscovered. At the end of fiscal year 2013, the IRS reported that taxpayer delinquent accounts between $2,000 and $10,000 accounted for 41 percent of all taxpayer delinquent accounts. In 2017, all three credit bureaus implemented changes to eliminate civil judgment records and half of all tax lien data from credit reports. By April 2018, all tax liens had been removed from credit reports by the bureaus.

The FHA Insurance Fund Was Negatively Impacted

As a result of the conditions noted above, FHA did not achieve OMB's policies for Federal credit programs, and the FHA insurance fund was exposed to greater risk.

The inclusion of these loans in FHA's portfolio negatively impacted FHA's achievement of OMB's policies for Federal credit programs. Each department has a responsibility to make every effort to effectively target Federal assistance and mitigate risk by (1) following appropriate screening standards and procedures for eligibility and determination of creditworthiness and (2) ensuring that lenders and servicers participating in Federal credit programs meet all applicable financial and programmatic requirements. By not prescribing adequate screening tools, FHA's insurance fund included loans that did not meet the required creditworthiness standards.

The FHA insurance fund was exposed to greater risk because at least $13 billion in loans that were not eligible for insurance coverage were included in the FHA portfolio. In addition to the overall impact of including ineligible loans in the portfolio, the ineligible loans had an increased likelihood of default. The loans to borrowers with delinquent Federal tax debts and no payment plan had a 3-month delinquency rate nearly 89 percent higher than that of the general population of loans endorsed in 2018.



Failing to exclude these ineligible borrowers resulted in increased risk to the FHA fund in this way as well. Our audit did not attempt to determine whether the delinquent Federal tax debt or other borrower characteristics caused these higher delinquency rates. The chart above was created using data extracted from the Single Family Data Warehouse.

Conclusion

FHA improperly insured loans to delinquent Federal tax debtors. This condition occurred because the FHA underwriting process did not require lenders to check adequate sources to identify the existence of tax debt. IRS data revealed that in a 1-year period, FHA insured at least $13 billion in loans to borrowers who should have been disqualified by their delinquent tax debt. By implementing our recommendations, FHA will avoid insuring at least $13 billion in ineligible loans each year. The potential loss on these loans is $6.1 billion, based on the FHA insurance fund average loss rate of 47 percent as of June 30, 2019.

Recommendations

We recommend that the Deputy Assistant Secretary for Single Family Housing

1A. Require lenders to obtain the borrowers' consent to verify the existence of delinquent Federal taxes with the IRS during loan origination and deny any applicant with delinquent Federal tax debt and no payment plan or a noncompliant payment plan or an applicant refusing to provide consent from receiving FHA insurance to put at least $6.1 billion to better use by avoiding potential future costs to the FHA insurance fund.

1B. Revise HUD handbooks for forward and reverse mortgages to reflect that tax liens and judgments are no longer reported on credit reports.

1C. Revise HUD handbooks for forward and reverse mortgages for uniformity in the treatment of delinquent tax debt and the existence of payment plans as only the forward mortgage handbook requires 3 months of payments.

Scope and Methodology

We performed our audit between October 2018 and May 2019 at our office in St. Louis, MO. Our audit generally covered loans that were endorsed for insurance from October 1, 2017, through September 30, 2018.

To accomplish our objective, we

- reviewed Federal regulations, FHA single-family policy handbooks, HUD mortgagee letters, and OMB guidance;
- entered into a data use agreement with TIGTA to match FHA loan data with IRS data;
- interviewed HUD staff; and
- reviewed previous GAO and TIGTA audit reports.

HUD's Single Family Data Warehouse is a large and extensive collection of database tables, organized and dedicated to support the analysis, verification, and publication of single-family housing data. Using this system, we identified more than 1.4 million borrowers who received FHA-insured mortgages during our audit period. (See appendix D for the number of loans obtained by these borrowers and their loan amounts.) We transferred the data for these borrowers to TIGTA to be matched against IRS tax data. We excluded streamline refinanced loans because delinquent Federal tax debt did not affect their eligibility.

We relied in part on data maintained by HUD in its Single Family Data Warehouse database to identify loans insured during our audit period. Based on the evidence obtained, we concluded the data were reliable for the purpose of meeting our audit objective. We also relied on data maintained by TIGTA to identify borrowers who owed delinquent tax debt to the Federal Government. During this review, TIGTA obtained extracts from the IRS individual master file in TIGTA's Data Center Warehouse. Before relying on the data, TIGTA selected random samples of each extract and verified that the data in the extracts were the same as the data captured in the IRS system. TIGTA also performed analysis to ensure the validity and reasonableness of the data, such as ranges of dollar values and transaction dates. Based on the results of that testing, we believe that the data used in this review were reliable and the results are accurate.

We conducted the audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective(s). We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Internal Controls

Internal control is a process adopted by those charged with governance and management, designed to provide reasonable assurance about the achievement of the organization's mission, goals, and objectives with regard to

- effectiveness and efficiency of operations,
- reliability of financial reporting, and
- compliance with applicable laws and regulations.

Internal controls comprise the plans, policies, methods, and procedures used to meet the organization's mission, goals, and objectives. Internal controls include the processes and procedures for planning, organizing, directing, and controlling program operations as well as the systems for measuring, reporting, and monitoring program performance.

Relevant Internal Controls

We determined that the following internal controls were relevant to our audit objective:

- Controls to prevent the issuance of FHA loan insurance to ineligible, delinquent Federal tax debtors.

We assessed the relevant controls identified above.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, the reasonable opportunity to prevent, detect, or correct (1) impairments to effectiveness or efficiency of operations, (2) misstatements in financial or performance information, or (3) violations of laws and regulations on a timely basis.

Significant Deficiency

Based on our review, we believe that the following item is a significant deficiency:

- FHA did not have adequate controls to prevent the issuance of FHA insurance on loans made to ineligible borrowers who owed delinquent Federal tax debt (finding).

Appendixes

Appendix A

Schedule of Funds To Be Put to Better Use

Recommendation number	Funds to be put to better use 1/
1A	$6,130,757,970
Total	6,130,757,970

1/ Recommendations that funds be put to better use are estimates of amounts that could be used more efficiently if an Office of Inspector General (OIG) recommendation is implemented. These amounts include reductions in outlays, deobligation of funds, withdrawal of interest, costs not incurred by implementing recommended improvements, avoidance of unnecessary expenditures noted in preaward reviews, and any other savings that are specifically identified. In this case, if HUD implements our recommendations, it will no longer provide FHA insurance to delinquent tax debtors reported by the IRS. By not insuring ineligible loans, it will reduce the risk of loss to the FHA insurance fund. The amount above reflects that, upon sale of the mortgaged property, FHA's average loss experience is about 47 percent based on statistics provided by HUD. [$13,044,165,895 x .47 = $6,130,757,970] When FHA successfully improves its controls, this will be a recurring benefit. Our estimate reflects only the initial year of this benefit, which we believe will be similar to the 2019 results since FHA activity is stable. These amounts do not include potential offsetting costs to implement our recommendations to revise the underwriting process.

Appendix B

Auditee Comments and OIG's Evaluation

Ref to OIG Evaluation	Auditee Comments

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-8000

OFFICE OF HOUSING

AUG 09 2019

MEMORANDUM FOR: Ronald J. Hosking, Regional Inspector General for Audit, 7AGA

FROM: Gisele G. Roget, Deputy Assistant Secretary for Single Family Housing, HU

SUBJECT: Discussion and Comments on Draft Audit:
FHA Insured at Least $13.7 Billion in Loans to
Ineligible Borrowers with Delinquent Federal Tax Debt
Issue Date: July 3, 2019

The Office of Inspector General (OIG) audited the Federal Housing Administration (FHA) insured loans from fiscal year 2018 to identify the number of FHA insured loans made to borrowers with delinquent Federal tax debt. The purpose of this audit was to determine whether FHA provided insurance on loans that were made to ineligible, delinquent Federal tax debtors. The OIG initiated this audit because a prior U.S. Government Accountability Office (GAO) audit found that FHA insured mortgages for borrowers with Federal tax debt (GAO-12-592).

Comment 1

The Office of Housing (Housing) agrees that FHA procedures must be enhanced to include screening borrowers to determine if the applicant is delinquent on any Federal debt, including tax debt. The findings are concerning to FHA, as the $13.7 billion in loans identified by the report represents a significant portion of the $209.05 billion in unpaid principal balance (UPB) on single-family loans insured by FHA in FY18.

Recommendation comments

lA. This recommendation seeks to require lenders to obtain the borrowers' consent to verify the existence of delinquent Federal taxes with the IRS. Housing will work with Office of General Counsel (OGC) and FHA leadership to ensure FHA is in full compliance with Circular A-129. Housing fully agrees that procedures must be enhanced to screen borrowers for loan eligibility.

lB. Housing will work with OGC and FHA leadership to evaluate this recommendation. As stated above, Housing will work with OGC and FHA leadership to ensure FHA is in full compliance with Circular A-129. Housing agrees that procedures must be enhanced to screen borrowers for loan eligibility.

1C. Housing will work with OGC and FHA leadership to evaluate this recommendation.

www.hud.gov espanol.hud.gov

Auditee Comments

Ref to OIG Evaluation

Comment 2

Conclusion

As indicated above, Housing agrees FHA procedures must be enhanced to provide screening of borrowers to determine if the applicant is delinquent on any Federal debt. Housing will provide additional details and target completion dates in its Management Decision.

OIG Evaluation of Auditee Comments

Comment 1 The amounts referenced in HUD's comments pertain to the draft version of the report which included streamline refinanced loans. We adjusted the amounts for the final report to remove streamline refinances.

Comment 2 HUD generally agreed with the findings and recommendations and agreed to take appropriate corrective actions. HUD will provide details and target completion dates in its Management Decision.

Appendix C

Criteria

OMB Circular No. A-129, Policies for Federal Credit Programs and Non-Tax Receivables

I. RESPONSIBILITIES OF DEPARTMENTS AND AGENCIES

D. Department and Agencies. Departments and agencies shall manage credit programs and all non-tax receivables in accordance with their statutory authorities and the provisions of this Circular to protect the Government's assets and to minimize losses in relation to social benefits provided. Specifically, agencies shall ensure that Federal credit program legislation, regulations, and policies are designed and administered in compliance with the principles of this Circular; the costs of credit programs are budgeted for and controlled in accordance with FCRA [Federal Credit Reporting Act]; and that credit programs are designed and administered in a manner that most effectively and efficiently achieves policy goals while minimizing taxpayer risk.

To achieve these objectives, agencies shall:

5. Make every effort to effectively target Federal assistance, and mitigate risk by a) following appropriate screening standards and procedures for eligibility and determination of creditworthiness, and b) making sure that lenders and servicers participating in Federal credit programs meet all applicable financial and programmatic requirements;

III. CREDIT EXTENSION AND MANAGEMENT POLICY

A. Credit Extension Policies.

1. Applicant Screening

a. *Program Eligibility.* Federal credit granting agencies and private lenders in guaranteed loan programs shall determine whether applicants comply with statutory, regulatory, and administrative eligibility requirements for loan assistance.

b. *Delinquency on Federal Debt.* Agencies should determine if the applicant is delinquent on any Federal debt, including tax debt. Agencies should include a question on loan application forms asking applicants if they have such delinquencies. In addition, agencies and guaranteed loan lenders shall use credit bureaus as a screening tool. Agencies are also encouraged to use other appropriate databases, such as the Department of Housing and Urban Development's Credit Alert Verification Reporting System and Treasury's Do Not Pay List to identify delinquencies on Federal debt.

Processing of applications shall be suspended when applicants are delinquent on Federal tax or non-tax debts, including judgment liens against property for a debt to the Federal Government, and are therefore not eligible to receive Federal loans, loan guarantees or insurance. (See 31 U.S.C. [United States Code] § 3720B regarding non-tax debts.) This provision does not apply to disaster loans or a marketing assistance loan or loan deficiency payment under Subtitle C of the Agricultural Market Transition Act (7 U.S.C. 7231, et. seq.). Agencies should review and comply with 31 U.S.C. § 3720B and 31 C.F.R. 285.13 before extending credit. Processing should continue only when the debtor satisfactorily resolves the debts (e.g., pays in full or negotiates a new repayment plan).

Handbook 4000.1, FHA Single Family Housing Policy Handbook

II. Origination Through Post-Closing/Endorsement

A. Title II Insured Housing Programs Forward Mortgages

1. Origination/Processing

(12) Delinquent Federal Tax Debt

(a) Standard

Borrowers with delinquent Federal Tax Debt are ineligible.

Tax liens may remain unpaid if the Borrower has entered into a valid repayment agreement with the federal agency owed to make regular payments on the debt and the Borrower has made timely payments for at least three months of scheduled payments. The Borrower cannot prepay scheduled payments in order to meet the required minimum of three months of payments.

The Mortgagee [lender] must include the payment amount in the agreement in the calculation of the Borrower's Debt-to-Income (DTI) ratio.

(b) Verification

Mortgagees must check public records and credit information to verify that the Borrower is not presently delinquent on any Federal Debt and does not have a tax lien placed against their Property for a debt owed to the federal government.

(c) Required Documentation

The Mortgagee must include documentation from the IRS evidencing the repayment agreement and verification of payments made, if applicable.

Handbook 4235.1, Home Equity Conversion Mortgages

4-3 Mortgage Credit Eligibility Requirements. A borrower must be rejected for any of the following reasons:

A. Delinquent Federal debts. If the borrower is presently delinquent on any Federal debt (e.g., VA [U.S. Department of Veterans Affairs]-guaranteed mortgage, HUD Section 312 Rehabilitation loan or Title I loan, Federal student loan, Small Business Administration loan, delinquent Federal taxes, etc.) or has a lien, including taxes, placed against his or her property for a debt owed to the United States, the borrower is not eligible until the delinquent account is brought current, paid or otherwise satisfied, or a satisfactory repayment plan is made between the borrower and the Federal agency owed and is verified in writing.

Appendix D

Tax Debtor Data

	Forward mortgages	Reverse mortgages	Total
FHA loans endorsed for insurance in fiscal year 2018			
Number of loans	961,740	48,319	1,010,059
Loan amount*	$198,914,802,105	$16,185,325,840	$215,100,127,945
FHA loans to delinquent Federal tax debtors			
Number of loans	111,654	2,640	114,294
Total tax owed	$1,061,712,546	$23,492,535	1,085,205,081
Loan amount*	$26,485,479,429	$887,177,629	27,372,657,058
Subset with payment plans (possibly ineligible)			
Number of loans	56,703	1,215	57,918
Total tax owed	$636,189,994	$10,325,726	$646,515,720
Loan amount*	$13,926,697,844	$401,793,319	14,328,491,163
Subset without payment plans (ineligible)			
Number of loans	54,951	1,425	56,376
Total tax owed	$425,522,552	$13,166,809	$438,689,361
Loan amount*	$12,558,781,585	$485,384,310	13,044,165,895

*Loan amount is the original mortgage amount for forward mortgages and the maximum claim amount for reverse mortgages.