

## Supporting Statement for Information Collection Requirements – Public Housing Reform Act; Changes to Admission and Occupancy Requirements

### Justification

1. Explain the circumstances that make the collection of information necessary.

This information collection is being updated to reflect the correct number of respondents, total hours, and burden hours for 24 CFR Part 5, admission and occupancy requirements of public housing and section 8 assisted housing that were made by the Quality Housing and Work Responsibility Act (QHWRA) of 1998 (referred to as the “1998 Act”). This information collection also corrected regulation cites.

The QHWRA is a statutory requirement that established changes in choice of rent, community service and self-sufficiency in public housing, and admission preferences and determination of income and rent in public housing and section 8 housing assistance programs. On March 29, 2000, HUD published a Changes to Admission and Occupancy Requirements in the Public Housing and Section 8 Housing Assistance Programs Final Rule in the Federal Register providing guidance on how PHAs may implement this change.

2. Indicate how, by whom, and for what purpose the information is to be used.

For public housing, according to the 1998 Act created optional deductions for PHAs to use if they choose to promote self-sufficiency and for other purposes. A PHA that decides to provide permissive deductions must describe its deductions in the agency’s written policies. This information is used to verify income based on these deductions

PHAs will be required to submit to HUD information on admission and occupancy requirements to ensure the statute mandates are implemented. Regulations (24 CFR part 5) relating to admission and occupancy requirements start the process to implement important changes necessitated by the “1998 Act” concerning community service, self-sufficiency, incentives and requirements in public housing, including the community services requirement. Information used to verify and track data.

Section 5.615(b)(1) – Welfare Rent Reduction Certification; PHA Notification – When a family request a rent reduction based on a reduction in family income from welfare, the processing entity must obtain written verification from the welfare agency of the basis for the reduction. PHAs must notify families who are adversely affected by reduction in welfare assistance that they have a right to administrative appeal through the PHA’s grievance procedures.

Section 960.503 – Over-Income Small PHAs – Small PHAs are permitted to rent units to over-income families on a month-to-month basis, in accordance with statutory

requirements, if there are no eligible families applying for assistance for that month, provided that the over-income family agrees to vacate (with at least 30 days notice) when the unit is needed for an income-eligible family.

Section 960.605(c) – Community Services and Economic Self-Sufficiency Program – The 1998 Act adds a new requirement for non-exempt residents of public housing. Each non-exempt adult public housing resident must contribute eight (8) hours per month of community service or participate, in a self-sufficiency program for 8 hours per month. Each PHA Annual Plan must include a description of how the community service and self-sufficiency will be implemented.

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.

The PHA collects the information and provides the information to HUD through the Public and Indian Housing Information Center (PIC) system. PIC captures the information from occupants and creates standard and ad hoc management reports for use by HUD, and the PHA. PIC is an automated, national, web-based, client-server database system that provides HUD with information about families who reside in federally assisted housing programs.

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.

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The Management and Occupancy Division is not aware of the Department collecting this information through any other information collection mechanism. Any information already submitted to HUD will not be requested again.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I, describe any methods used to minimize burden.

Small entities are affected by the information collection requirements. HUD has not imposed requirements beyond those required by the statute. Given the statutory requirements, there are no alternatives for submission of the required information. There is no significant economic impact on a substantial number of 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 United States Housing Act of 1937 (42 U.S.C. 1437 et seq.) 1937 Act)) dictates the information for the purpose of PHA admission and occupancy requirements. The collection conducted is the minimum necessary. Statutory and regulatory requirements would not be met if the collection is not conducted, or is conducted less frequently.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner—

- requiring respondents to report information to HUD more than quarterly;
- requiring respondents to prepare a written response to a collection of information fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any documents; or
- requiring respondents to retain records for more than three (3) years.

There are no special circumstances as described above required for this collection.

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.

A Federal Register Notice of Proposed Information Collection was published 5/15/06. The public was given a 60-day comment period as required by the Paperwork Reduction Act of 1995; the comment period ended 7/14/06. No comments were received on this information collection.

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

There are no payments or gifts provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation or agency policy.

There are no assurances of confidentiality provided or needed for this collection.

11. Provide additional justification for any questions of a sensitive nature, such as 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.

The collection does not involve any questions of a sensitive nature.

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 for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.
- 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.

**Total Burden Hour Estimates for PHAs**

Section Reference	No. of Respondents	Total Annual Responses	Hours	Total Hours	Burden Hours
5.615(b)(1)	4,200 PHAs	1	4,200	2	8,400
960.505	1,000 Individuals	1	1,000	2	2,000
960.605(c)	1,653 PHAs*	1	1,653	40	66,120
<b>TOTALS</b>	<b>5,200</b>				<b>76,520</b>

\*Under reference number 960.605© these respondents are PHAs that must describe how they determine which family members are subject to or exempt from the service requirement.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

The automation of the collection of this information will not incur any additional costs to the respondents. Since the collection of information is been captured in PIC, it has resulted in significant benefits, such as increasing the speed of information preparation and exchange; cost savings from reduced need for paper submission; and faster HUD review and analysis. In addition, electronic submission has reduced the administrative burden that manual submission presents to HUD program participants and HUD staff alike.

14. Provide estimates of annualized costs to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, opera-

tional expenses (such as equipment, overhead, printing, and support staff), and any other that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

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There is no additional cost to the Federal Government.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

The number of annual burden hours has increased by 1720. This change is due to a miscalculation in the prior submission.

16. For collections 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 results will not 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 OMB expiration date.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement identified in item 19 of the OMB 83-I.

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## **B. Collections of Information Employing Statistical Methods**

This information collection does not employ statistical methods.



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