Supporting Statement for Paperwork Reduction Act Submission Section Eight Management Assessment Program (SEMAP) Certification

A. JUSTIFICATION

1. **Reason for collection.** Program Regulations at 24 CFR Part 985 sets for the requirements of the Section Eight management Assessment Program (SEMAP) that includes a certification of indicators reflecting performance similar to the Public Housing Assessment System (PHAS) for public housing. Through this assessment HUD can improve oversight of the housing choice voucher (HCV) program and target monitoring and assistance to public housing agencies (PHA) that need the most improvement and pose the greatest risk.

Authority: 42 U.S.C. 1437a, 1437c, 1437f, and 3535(d).

- 2. **Use of information.** HUD uses the PHA's SEMAP certification, together with other available data, to assess PHA management capabilities and deficiencies, and to assign an overall performance rating to each PHA administering a HCV program. HUD rates a PHA on each SEMAP indicator, completes a PHA SEMAP profile identifying any program management deficiencies and assigns an overall performance rating. A PHA's written report of correction of a SEMAP deficiency is used as documentation that the PHA has taken action to address identified program weaknesses. Where HUD assigns an overall performance rating of troubled, the PHA's corrective action plan is used to monitor the PHA's progress on program improvements.
- **3. Use of automated collection techniques.** The Department has developed the Public and Indian Housing Information Center (PIC) for electronic submission and scoring of SEMAP certifications via the Internet. Since December 2000 PHAs have been submitting, and HUD field offices have been scoring, SEMAP certifications.
- 4. **Efforts to identify duplication.** The information collection on the SEMAP certification does not duplicate any currently collected information.
- 5. **Methods to minimize the burden on small entities.** HUD published its final rule regarding the Deregulation for Small Public Housing Agencies in the Federal Register on June 24, 2003. This rule streamlines HUD's regulatory requirements for small public housing agencies (PHAs) that administer the public housing and voucher assistance programs under the United States Housing Act of 1937. The final rule deregulated the assessment and scoring of small PHAs under PHAS and SEMAP. In accordance with this final rule, the burden is the least necessary to accomplish the Department's purpose.
- 6. **Consequences if collected less frequently.** Assessing PHA program performance less than annually can result in poor performance going unchecked for longer periods and may result in more ineligible families being assisted, housing quality standards not being sufficiently monitored, or more incorrect subsidies being paid.
- 7. **Special circumstances.** There are no special circumstances that would cause this information collection to be conducted more than quarterly based on the fiscal year-end date of the PHA or for PHAs to submit their certifications more than annually.

- 8. A *Federal Register* Notice of Proposed Information Collection was published on 8/31/06. The public was given a 60-day comment period as required by the Paperwork Reduction Act of 1995; the comment period ended and ended October 30, 2006. No comments were received on this information collection.
- 9. **Payment to respondents.** No payment or gift is provided to respondents.
- 10. **Assurance of confidentiality.** There are no assurances of confidentially provided to respondents.
- 11. **Questions of a sensitive nature.** There are no questions of a sensitive nature.
- 12. Estimated hour burden. The data below changes from year to year based on the number of PHAs that are required to submit a SEMAP certification. However, the changes in the number of submissions each year (including changes due to biennial reporting) is relatively insignificant to warrant changes to the numbers reflected below, which are unchanged from the previous justification statement.

Information Collection	No. of Respondents	Responses Per Respondent	Total Annual Responses	Hrs per Response	Total Hrs	Regulatory Reference
SEMAP Certification	2,437	1	2,437	12	29,244	985.101
Corrective Action Plan	260	1	260	10	2,600	985.107(c)
Report on Correction of SEMAP Deficiency	670	1	670	2	1,340	985.106
TOTAL ANNUAL BURDEN					33,184	

Estimated annualized cost to respondents. 33,184 total hours x \$20/hr. = \$665,680/ 2,437 respondents = \$273per respondent.

- 13. Estimated annual cost. No additional cost to respondents.
- 14. Annualized cost to Federal government. None.
- 15. **Reasons for program changes.** There have been no program changes since the last justification submission.
- 16. **Plans for publication of information collected.** The information collection results will not be published.

17. **Approval to not display expiration date for OMB approval.** HUD is not seeking approval to avoid displaying the OMB expiration date.

18. **Exceptions to certification.** There are no exceptions to the certification statement identified in item 19, OMB 83-i.

B. <u>COLLECTIONS EMPLOYING STATISTICAL METHODS.</u>

The Department's collection of information for SEMAP does not employ statistical methods.