

**Supporting Statement for Paperwork Reduction Act Submissions  
2577-0083**

This Paperwork Reduction Act submission describes the proposed renewal of Form HUD-50058 (Family Report) and Form HUD-50058 MTW (MTW Family Report). Form HUD-50058 MTW is derived from Form HUD-50058 and is used by the same respondents. Some public housing agencies (PHAs) use both forms. Together these forms solicit information about the complete population of tenants nationwide who are in assisted housing administered by the Department of Housing and Urban Development's Office of Public and Indian Housing (PIH).

Excerpts from the following statutory and regulatory requirements are attached:

- The United States Housing Act of 1937 (42 U.S.C 1437 et seq.)
- Quality Housing and Work Responsibility Act of 1998 (Public Law 105-276 Title V)
- HUD Appropriations Act of 1996 (Public Law 104-134 Section 204)
- "Electronic Transmission of Required Family Data for Public Housing, Indian Housing, and the Section 8 Rental Certificate, Rental Voucher, and Moderate Rehabilitation Programs" (24 CFR Part 908)

**1. Circumstances that make the collection of information necessary**

*[Instruction 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.]*

**Form HUD-50058, Family Report:** PIH provides funding to public housing agencies to administer assisted housing programs. To monitor public housing agencies and obtain information on the families that are served, HUD collects demographic, family profile, income and housing information via Form HUD-50058 about residents who participate in the Housing Choice Voucher and Public Housing programs. This information allows HUD to monitor and evaluate its programs as required under the United States Housing Act of 1937, including Public Law 105-276, Section 204 of the 1996 HUD Appropriations Act, and the Quality Housing and Work Responsibility Act of 1998 (12/98). Through this clearance process, HUD seeks OMB authorization to extend Form HUD-50058 (1/2007). No revisions were made to this form.

**Form HUD-50058 MTW, MTW Family Report:** The Moving to Work (MTW) Demonstration program allows participating public housing agencies to design and test more effective strategies and models for managing housing assistance and achieving self-sufficiency among assisted families. Form HUD-50058 MTW is designed to collect demographic, family profile, income and housing data about tenant families who participate in any component of the MTW Demonstration program. As the MTW program gives each MTW PHA the flexibility to design its own programs, Form HUD-50058 MTW requires less information than the regular Form HUD-50058 from which it is derived. This collection of MTW information supports the program monitoring and evaluation required by Congress under Section 204 of the 1996 HUD Appropriations Act. Through this clearance process, HUD seeks OMB authorization to extend Form HUD-50058 MTW (1/2007). No revisions were made to this form.

**The Federal Register** (Volume 71, Number 195) published a notice on October 10, 2006, containing the existing Form HUD-50058 and Form HUD-50058 MTW for renewal.

Public comments were solicited to:

- Evaluate the accuracy of the information.

- Enhance the quality, utility and clarity of the information to be collected.
- Minimize the burden of the collection of information for.

## 2. How, by whom, and for what purpose the information collection is to be used

*[Instruction 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.]*

**Form HUD-50058** - Public housing agencies (PHA) that administer the Housing Choice Voucher and Public Housing programs collect and electronically submit information contained on Form HUD-50058 to HUD. The Public and Indian Housing Information Center (PIC) system captures the information from Form HUD-50058 and creates standard and ad-hoc management reports for use by HUD, PHAs, and the public. HUD will use the information collected to:

- Analyze the subsidized housing programs
- Monitor public housing agencies
- Detect and prevent fraud
- Provide information to Congress and other interested parties.

**Form HUD-50058 MTW** – Public housing agencies that participate in the MTW Demonstration program collect information required on Form HUD-50058 MTW. Currently, twenty-four such agencies have signed agreements to participate in the MTW program. PHAs participating in the MTW Demonstration program with alternate rent structures will report data from Form HUD-50058 to the MTW module in PIC. HUD will use the information collected to:

- Analyze the subsidized housing programs
- Monitor public housing agencies
- Detect and prevent fraud
- Provide information to Congress and other interested parties.

## 3. Use of information technology

*[Instruction 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 Public and Indian Housing (PIH) Information Center (PIC) is the repository for data entered on Form HUD-50058 and Form HUD-50058 MTW. 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. Public housing agencies submit their Form HUD-50058 electronically at least monthly and Form HUD-50058 MTW data electronically regularly for storage and use by HUD Headquarters, field offices and the public.

## 4. Efforts to identify duplication

*[Instruction 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.]*

HUD is not collecting this data through any other information collection mechanism. The data requested on Form HUD-50058 and Form HUD-50058 MTW cannot be obtained from other HUD computerized systems.

## **5. Impact on small businesses or other small entities**

*[Instruction 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.]*

This information collection has no significant impact on small businesses or other small entities. The Department received OMB approval on September 6, 2006, to require PHAs with less than 100 units to submit Form HUD-5008 and Form HUD-5008 MTW data monthly, opposed to quarterly.

## **6. Consequences of not collecting this information or of less frequent collection**

*[Instruction 6. Describe the consequences 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.]*

Public housing agencies must provide data on Form HUD-50058 or Form HUD-50058 MTW at least annually for each tenant household. The PHA's annual submission may report data related to new admission of the household to the Housing Choice Voucher or Public Housing program, annual updates to household income and/or composition, or end of participation of the household in the housing assistance program. If family circumstances or management dictate, each PHA has the option of completing Form HUD-50058 or Form HUD-50058 MTW more frequently for a particular household. For example, a PHA may wish to update family income data, report issuance of a voucher to the family under the Housing Choice Voucher program, or report completion of the annual Housing Quality Standards inspection for the family's rental unit at a time during the year that does not coincide with the scheduled annual update.

This periodic collection of data for each tenant household provides HUD with a clear understanding of the demographic, family profile, income and housing characteristics of the assisted families who participate in HUD programs. Periodic collection of this set of data also allows HUD to monitor program performance and to exercise management controls where and when necessary to optimize program performance and the utilization of housing subsidy. Therefore, failure to collect this data at least annually would jeopardize the Department's ability to create effective program policies, measure the impact of program policies and funding, and provide accurate information to OMB, Congress and the public.

## **7. Special Circumstances: Reporting Frequency**

*[Instruction 7. Explain any special circumstances that require the collection to be conducted in a manner:*

- requiring respondents to report information to the agency more often than quarterly;*
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*
- requiring respondents to submit more than an original and two copies of any document;]*

Although public housing agencies are only required to submit data annually for each participating household, families move into and out of subsidized units throughout the year. Therefore, the agencies complete the forms for individual families at different times during the year. HUD requires all agencies to electronically submit the forms (Form HUD-50058 and Form HUD-50058 MTW) that they have completed to the PIC system at least monthly. The Department received OMB approval on September 6,

2006, to require PHAs with less than 100 units to submit Form HUD-50058 and Form HUD-50058 MTW data monthly, opposed to quarterly.

## **8. Consultation with persons outside of the agency**

*[Instruction 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. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.*

*Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.*

*Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that mitigate against consultation in a specific situation. These circumstances should be explained.]*

### **Federal Register Notice:**

- HUD published the “**Notice of Proposed Information Collection for Public Comment; MTCS Family Reporting**” in the Federal Register (Volume 71, Number 195) published a notice on October 10, 2006, in order to solicit public comments regarding its intent to renew Form HUD-50058 and Form HUD-50058 MTW. The public has until December 11, 2006, to submit comments

### **Other efforts to consult with persons outside of the agency:**

The Department conducted informal consultation with public housing agencies on the reporting burden for Form HUD-50058.

## **9. Payments or gifts to respondents**

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

No payments or gifts were provided to respondents.

## **10. Confidentiality**

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

The staff of public housing agencies - the respondents to the information collection covered by the forms and systems described in this submission - solicit the tenant information from participants in HUD's housing assistance programs for the purpose of their administration of the programs. Information accumulated by the PHA is then submitted to HUD.

In accordance with the Federal Privacy Act of 1974, 5 U.S.C. 552a, public housing agencies must inform applicants and resident families about possible Federal Government uses of information contained on Form HUD-50058, Form HUD-50058 MTW, and the systems to monitor reductions in subsidy payment errors. Form HUD-9886, (“Authorization for the Release of Information / Privacy Act Notice”) and other

materials developed by PHAs are used to inform tenants of the authority for the collection of information, the purpose of the collection, and the uses of the information collected by the PHAs pursuant to the agencies' obligation to submit information to HUD. Tenants give consent for the collection and use of information by signing Form HUD-9886 or other suitable consent form kept by the PHAs.

The instructions for both forms include a statement that informs the PHAs that information collected is considered sensitive and is protected by the Privacy Act. A similar statement will be provided for the complementary system when it is implemented.

## **11. Questions of a sensitive nature**

*[Instruction 11. Provide additional justification for any questions of a sensitive nature, such as sexual 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 staff of public housing agencies - the respondents to the information collection covered by the forms and systems described in this submission - solicit the tenant information from participants in HUD's housing assistance programs for the purpose of their administration of the programs. Some of the information accumulated by the PHAs is then submitted to HUD. None of the forms or systems covered in this submission solicit information of a sensitive nature (such as sexual behavior and attitudes, or religious beliefs).

Information about matters that are commonly considered private, such as names, addresses, social security numbers, dates of birth, income, public benefits received, etc., are required for proper administration of the assisted housing programs and for monitoring program performance. The explanations given to persons from whom information is ultimately requested (tenants) and the steps taken to obtain their consent are described in the previous section (section 10).

## **12. Estimated reporting burden**

*[Instruction 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 the 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.]*

Initially, public housing agencies will need sixty minutes to collect and input the data into each Form HUD-50058 and Form HUD-50058 MTW record. Only a fraction of the fields are filled out every time the form is completed. The fields that are used for each tenant depend upon the reason Form HUD-50058

is being completed (i.e., “action type”). After using the form for a period of one-year, the average collection and input time should be reduced to 30 minutes per form. The reduction in time will be achieved by pre-entry of key information from the previous year. PHAs that administer the Family Self-Sufficiency (FSS) or Welfare to Work (WtW) voucher programs will require an additional 15 minutes per form for completion of the information.

**Estimated Burden (Hours):**

Information Collection	Number of Respondents (PHA)	Average Number of Responses per Respondent (PHA) (1), (2)	Total Annual Responses	Minutes Per Response (3)	Total Hours	Regulatory Reference (24 CFR)
Form HUD-50058 (New Admission)	4127	69	284,763	60	284,763	908.101, 960, 982, 984, Part 5
Form HUD-50058 (Recertification)	4127	934	3,854,618	30	1,927,309	908.101, 960, 982, 984, Part 5
Form HUD-50058 MTW (New Admission)	18	814	14,652	60	14,652	908.101, 960, 982, 984, Part 5
Form HUD-50058 MTW (Recertification)	18	10,985	197,730	30	98,865	908.101, 960, 982, 984, Part 5
<b>total responses:</b>			<b>4,351,763</b>	<b>total hours:</b>	<b>2,325,589</b>	

**Estimated annualized hourly costs to respondents (PHA):**

To report using Form HUD-50058, it will cost the average PHA \$1,210 during the first year and \$8,187 in subsequent years to enter and submit data.

**Year 1:**

Total cost for all PHAs = 284,763 total hours X \$17.53/hour(4) = \$4,991,895 total cost for all PHAs

Cost per PHA = Total cost for all PHAs ÷ 4,127 PHAs = \$1,210 per PHA per year.

**Subsequent years:**

Total cost for all PHAs = 1,927,309 total hours X \$17.53/hour = \$33,785,727 total cost for all PHAs.

Cost per PHA = Total cost for all PHAs ÷ 4,127 PHAs = \$8,187 per PHA per year.

To report using Form HUD-50058 MTW, the average cost to an MTW PHA is \$14,269 during the first year and \$96,284 for subsequent years.

**Year 1:**

Total cost for all PHA = 14,652 total hours X \$17.53/hour = \$256,850 total cost for all PHAs.

Cost per PHA = Total cost for all PHAs ÷ 17 PHAs = \$14,269 per PHA per year.

**Subsequent years:**

Total cost for all PHAs = 73,230 total hours X \$17.53/hour = \$1,283,103 total cost for all PHAs.

Cost per PHA = Total cost for all PHAs ÷ 17 PHAs = \$96,284 per PHA per year.

The average cost per PHA to collect, enter and submit data on Form HUD-50058 MTW is significantly higher than for Form HUD-50058 because large PHAs are over-represented in the MTW program. Each

MTW PHA will submit more forms (Form HUD-50058 MTW) on average because each administers HUD programs for a larger than average number of tenant households.

### **13. Estimate of total annual cost to respondents**

*[Instruction 13. Provide an estimate of the total annual cost burden to respondents or record-keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)*

*- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.*

*- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.*

*- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.]*

#### **Total annual capital and start up cost burden to PHA**

It is difficult to estimate the annual capital cost to respondents for the collection, transmission and storage of Form HUD-50058 and Form HUD-50058 MTW information. A majority of, if not all, public housing agencies utilize automated data equipment and software in their day-to-day business operation. A number of software vendors are providing services to PHAs for development of software programs. In many instances, however, the software is not exclusively for form reporting but is utilized for many management functions including accounting, organization of waiting lists, inventory maintenance, resident family demographics and payroll.

HUD also provides the Family Reporting Software (FRS) packages with accompanying user manuals free of charge to all PHAs. Public housing agencies can use this software to electronically collect and submit Form HUD-50058 data to PIC.

#### **Total operation and maintenance of services components**

The cost to PHAs for the transmission of the forms is difficult to estimate because of differences in PHA size, organizational structure and administrative capability. A significant cost factor that can be tracked is the time involved to collect the data, fill out the forms and submit data electronically. In the first year, it will take 299,415 total hours to collect the data and fill out Form HUD-50058 and Form HUD-50058 MTW. In subsequent years, it will take 2,026,174 total hours to collect and fill out Form HUD-50058 and Form HUD-50058 MTW. Please see section 12 for further explanation.

#### **14. Estimate of annualized cost to HUD**

*[Instruction 14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from paragraphs 12, 13, and 14 in a single table.]*

Based on current information, the total annual cost to maintain the Public and Indian Housing Information Center (PIC) system, which includes the Form 50058 Module and other supporting and related modules, is \$5,033,052. Maintenance costs for 2006 (12 months) is \$3,565,680 and Development costs for 2006 (12 Months) is \$1,467,371. The cost for HUD headquarters staff to monitor the system is roughly \$503,305 (10 percent of contractor costs). HUD estimates that contractors and HUD staff spend 55 percent of their time on maintenance and monitoring of Form 50058 Module alone. The annual cost of contractor labor to maintain the PIC Form 50058 Module is approximately \$2,768,179 and the annual cost of HUD headquarters staff labor to monitor the module is approximately \$198,000 for a total annual cost of \$2,966,179.

#### **15. Reasons for the adjustment reported in item 13 of the OMB 83-I**

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

The average annual reporting and record-keeping burden has increased, as compared to the current OMB inventory, by 700,862 hours. The burden has increased by due to revised minutes per response value that was adjusted after consultation with PHAs.

#### **16. Publishing of data**

*[Instruction 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.]*

The data collected on the forms provides HUD with important characteristics of the people who participate in subsidized housing programs. Public housing agencies collect and electronically submit information contained on Form HUD-50058 and Form HUD-50058 MTW to HUD. The PIC system then captures this information and creates monthly reports used to:

- Analyze the subsidized housing programs
- Monitor public housing agencies
- Detect fraud
- Provide information to Congress and other interested parties

One of these reports, the Resident Characteristics Report, is available to the public on the HUD website. It provides demographic and income statistics about tenant families that participate in the Housing Choice Voucher and Public Housing programs reported to PIC on Form HUD-50058 (and eventually Form HUD-50058 MTW).

#### **17. Approval not to display the OMB expiration date**

*[Instruction 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.]*



No request to not display the expiration date.

**18. Exception to the certification statement**

*[Instruction 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.