

## Supporting Statement for Paperwork Reduction Act Submissions

### A. Justification

1. The information collected during the onsite comprehensive reviews of Public Housing Agencies (PHAs) will allow HUD to evaluate the PHAs' compliance with civil rights and fair housing laws and regulations.

#### **Regulatory Authorities**

24 CFR 1.6(b); 24 CFR 8.55; 24 CFR 125.

#### **Administrative Requirements**

Joint Agreement between the Office of Fair Housing and Equal Opportunity (FHEO) and the Office of Public and Indian Housing (PIH) - Civil Rights Front End and Limited Monitoring Review.

2. The respondents are public housing agencies and PIH staff will collect the information during the onsite comprehensive/consolidated reviews.

The PHAs that will have an on-site review belong to the list of Tier 1 PHAs that manage 80 percent of HUD fund. The 20 PHAs were selected based on the risk assessment. FHEO staff will be responsible for analyzing the information collected and for final resolution of civil rights and fair housing problems, if any. Also, FHEO staff will be available for any requested guidance or technical assistance on civil rights-related or fair housing requirements. During the on-site comprehensive/consolidated reviews, the checklists A and B will be used to interview PHAs' management/staff and obtain the requested information.

**Attachment A** - "Guidance and checklist for the On-Site Limited Monitoring Review of Civil Rights-Related Program Requirements (CRRPR) for Low-Rent Public Housing (LR) Program and Housing Choice Voucher (HCV) Program." Checklist A will be completed by PIH staff and forwarded to FHEO within 10 business days of completing the onsite comprehensive/consolidated review.

**Attachment B** - "On-Site Limited Monitoring Review -- Section 504." Checklist B will be completed by the PHA, collected by PIH staff who will forward it to FHEO within ten business days of completing its onsite comprehensive/consolidated review. If the data is not available for the reviewer, the PHA must forward the completed checklist directly to FHEO within five (5) business days of the PIH exit interview.

3. Currently, there are no plans to automate this process as it requires the Reviewers to conduct on-site reviews of programmatic policies, written procedures, and internal controls. At this time, automating this process is not feasible as it will not allow reviewers to adequately conduct on-site comprehensive/consolidated reviews of the PHAs to ensure compliance with HUD regulations and guidelines. However, to reduce burden hours, the following HUD procedures have been incorporated:
  - a. The reviewers will be required to conduct desk reviews prior to the on-site reviews, which requires gathering and analyzing data available in HUD systems; and,
  - b. HUD field offices will prioritize on-site reviews based on risk assessment and available travel funds.
4. The information collection incorporates a preliminary desk review to prevent duplication of information. The process requires the reviewers to gather general information from internal data sources prior to the on-site reviews.
5. No significant impact on small entities. Efforts to minimize burden is addressed in item #3 above.

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6. HUD collects this information to determine if the PHAs's management and operations are in compliance with civil rights and fair housing laws, regulations, and policies.
7. There are no special circumstances involved in this information collection.
8. A notice of the subject information collection was published in the *Federal Register* on November 9, 2006, soliciting public comment and input. The comment period ends January 8, 2007.
9. No payments or gifts are provided to the respondents.
10. There are no assurances of confidentiality.
11. There are no questions of a sensitive nature included in the information collection.
12. Number of respondents: 20  
Total annual responses: 20  
Annual hour burden: 40

It has been estimated that each respondent will spent about 2 hours providing information to the agency's checklists.

13. There are no additional capital or start-up costs. There are no total operation and maintenance purchase of services components required for collecting this information.
14. No additional cost to the Federal Government.
15. This is a new collection.
16. The results of this reporting will not be published.
17. HUD is not seeking approval not to display the expiration date for OMB approval of the information collection.
18. There are no exceptions to the certification statement identified in item 19.

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

There are no statistical methods used in this collection.