Paperwork Reduction Act Submission

Please read the instruction before completing this form. For additional forms or assistance in completing this forms, contact your agency's Paperwork Reduction Officer. Send two copies of this form, the collection instrument to be reviewed, the Supporting Statement, and any additional documentation to: Office of Information and Regulatory Affairs, Office of Management and Budget, Docket Library, Room 10102, 725 Seventeenth St. NW, Washington, DC 20503.

1. Agency/Subagency Originating Request:
U.S. Department of Housing and Urban Development
Office of Multifamily Housing, Office of Asset Management

2. OMB Control Number:
a. **2502-0505** b. None

3. Type of information collection: (check one)
a. ☐ New Collection
b. ☐ Revision of a currently approved collection
c. ☒ Extension of a currently approved collection
d. ☐ Reinstatement, **without change**, of previously approved collection for which approval has expired
e. ☐ Reinstatement, **with change**, of previously approved collection for which approval has expired
f. ☐ Existing collection in use without an OMB control number

For b-f, note item A2 of Supporting Statement instructions.

4. Type of review requested: (check one)
a. ☒ Regular
b. ☐ Emergency - Approval requested by
c. ☐ Delegated

5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities?
☐ Yes ☒ No

6. Requested expiration date:
a. ☒ Three years from approval date b. ☐ Other (specify)

7. Title:
Comprehensive Needs Assessment (CNA)

8. Agency form number(s): (if applicable)
HUD-96001, HUD-96002, HUD-96003

9. Keywords:
Housing, Housing Standards, Multifamily Housing Projects, Assessment

10. Abstract:
The Comprehensive Needs Assessment is a description of current and future resources and needs of certain multifamily housing projects. Owners and non-profit entities submit the information.

11. Affected public: (mark primary with "P" and all others that apply with "X")
a. **X** Individuals or households
b. **P** Business or other for-profit
c. **X** Not-for-profit institutions
e. Farms
f. Federal Government
g. State, Local or Tribal Government

12. Obligation to respond: (mark primary with "P" and all others that apply with "X")
a. Voluntary
b. Required to obtain or retain benefits
c. **P** Mandatory

13. Annual reporting and recordkeeping hour burden:

a. Number of respondents	940,032
b. Total annual responses	47,022
Percentage of these responses collected electronically	25%
c. Total annual hours requested	19,022
d. Current OMB inventory	90,668
e. Difference (+,-)	-71,646
f. Explanation of difference:	
1. Program change:	
2. Adjustment:	-71,646

*Adjustment made based on current number of responses.

14. Annual reporting and recordkeeping cost burden: (in thousands of dollars)
Do not include costs based on the hours in item 13.

a. Total annualized capital/startup costs	$0.00
b. Total annual costs (O&M)	$0.00
c. Total annualized cost requested	$0.00
d. Total annual cost requested	$0.00
e. Current OMB inventory	$0.00
f. Explanation of difference:	
1. Program change:	
2. Adjustment:	$0.00

15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X")
a. **X** Application for benefits
b. Program evaluation
c. **X** General purpose statistics
d. **X** Audit
e. Program planning or management
f. Research
g. **P** Regulatory or compliance

16. Frequency of recordkeeping or reporting: (check all that apply)
a. ☐ Recordkeeping b. ☐ Third party disclosure
c. ☒ Reporting:
1. ☒ On occasion 2. ☐ Weekly 3. ☐ Monthly
4. ☐ Quarterly 5. ☐ Semi-annually 6. ☒ Annually
7. ☐ Biennially 8. ☒ Other (describe) Once to comply with statute

17. Statistical methods:
Does this information collection employ statistical methods?
☐ Yes ☒ No

18. Agency contact: (person who can best answer questions regarding the content of this submission)
Name: **Kimberly R. Munson**
Phone: **(202) 708-1320, ext. 5122**

19. Certification for Paperwork Reduction Act Submissions

On behalf of the U.S. Department of Housing and Urban Development, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9.

Note: The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320/8(b)(3) appears at the end of the instructions. The certification is to be made with reference to those regulatory provisions as set forth in the instructions.

The following is a summary of the topics, regarding the proposed collections of information that the certification covers:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities;
- (d) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) It indicates the retention periods for recordkeeping requirements;
- (g) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
  - (i) Why the information is being collected;
  - (ii) Use of the information;
  - (iii) Burden estimate;
  - (iv) Nature of response (voluntary, required for a benefit, or mandatory);
  - (v) Nature and extent of confidentiality; and
  - (vi) Need to display currently valid OMB control number;
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to collected (see note in item 19 of the instructions);
- (i) It uses effective and efficient statistical survey methodology; and
- (j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in item 18 of the Supporting Statement.

Signature of Program Official: X Michael F. Hill, Deputy Assistant Secretary for Operations, HR	Date:

Signature of Senior Officer or Designee: X Wayne Eddins, Departmental Reports Management Officer, Office of the Chief Information Officer	Date:

Supporting Statement for Paperwork Reduction Act Submissions

Comprehensive Needs Assessment
OMB Control Number 2502-0505
(Forms HUD-96001, HUD-96002, HUD-96003)

A. Justification

1. Explain the circumstance 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.

Comprehensive Needs Assessments, or CNAs, are authorized by Title IV of the Housing and Community Development Act of 1992, as amended by the Multifamily Housing Property Disposition Reform of 1994 (P.L. 103-233), and Section 531 of the Department of Veterans Affairs and Housing and Urban Development, and Independent Agencies Appropriations Act, 1998, P.L.105-65 (approved October 27, 1997), which demonstrates to the Secretary capital grant assistance for rehabilitation needs for the project.

- The CNA is a description of current and future financial resources and needs of certain multifamily projects.
- The CNA involves project residents in the development, from start to finish.
- It is based on a thorough and detailed physical inspection of the project.
- The CNA includes a statement of any assistance needed under programs administered by the Department.
- It describes available resources for meeting the current and future needs of the project and the likelihood of obtaining such resources. Such resources include assistance from private foundations, State and local governments, any HUD programs (so long as the funds are used to address items that would normally be covered by the reserve for replacement account and so long as the reserve for replacement account maintains a minimum balance of $1,000 per unit), residual receipts account funds and Section 241 loans.
- The CNA also includes descriptions of modernization needs and activities, descriptions of supportive services needed and supportive services provided, descriptions and security needs, and descriptions of any personnel needs of the project, including service coordinators and security staff.

HUD regulations, which can be located at 24 CFR Part 401.450, also authorize this collection.

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.**

A project owner contracts with an arm-length, non-identity of interest entity to prepare a project's CAN, referred to as the Assessor. The Assessor is the individual/company hired to conduct the CNA for the owner. Owners are to use private, independent, professional entities or persons qualified to conduct and prepare the CNA. The Assessor completes forms HUD-96002 and 96003 and collects the form HUD-96001 from residents. The Assessor must use the information to estimate repair costs, itemize repairs using the repair item numbers and descriptive titles shown on the form HUD-96002, identify immediate health and safety issues, and identify near term, long term, and remainder repairs based on the date of the inspection. Owners and nonprofit entities submit this information for HUD's review. HUD will review the information to assess the owner's current and future resources required for capital repairs to the project. The information will also be used to determine the amount of grant assistance that may be provided.

The CNA is a description of current and future financial resources and needs of certain multifamily projects. It is based on a thorough and detailed physical inspection of the project. The CNA includes a statement of any assistance needed under programs administered by the Department.

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 information collected from the owners is collected electronically via a disk that is provided by the Assessor who is hired by the project owner. This information is sent to the Housing Project Manager in the field to be uploaded into their system. The CNA is project specific, and the data collected directly correlates to a specific project and further automation would not reduce the burden. The CNA also involves project residents in the development, from start to finish. The information provided by the tenants will not be automated due to limited access of computer resources.

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.**

There will be no duplication of information.

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

The collection of this information does not impact small businesses.

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 statute requires that the CNA be updated every five years, and that reports are submitted by the Secretary to the Congress outlining the results of the CNAs. Approximately five hundred new CNAs and one thousand updates are received yearly.

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

● requiring respondents to report information to the agency more than quarterly;
There is no requirement to report information to the agency more than quarterly.
● requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
There is no requirement for respondents to prepare a written response to a collection of information in fewer than 30 days after receipt.
● requiring respondents to submit more than an original and tow copies of any document;
There is no requirement for respondents to submit more than an original and two copies of any document.
●-requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
There is no requirement for respondents to retain records other than for health, medical, government contract, grant-in-aid, or tax records for more than three years.
● in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;

There are no statistical surveys involved with this collection.
● requiring the use of statistical data classification that has not been reviewed and approved by OMB;
There is no requirement for the use of statistical data classification that has not been reviewed and approved by OMB.
● that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
There is no pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.
● requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that is has instituted procedures to protect the information's confidentiality to the extent permitted by law.
There is no requirement for respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances associated with this collection of information.

8. If applicable, provide a copy and identify the date and age 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 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 preclude consultation in a specific situation. These circumstances should be explained.

The information is conducted in a manner consistent with 5 CFR 1320.8(d). The Notice for this collection was announced in the *Federal Register* on Wednesday, January 3, 2007, Vol. 72, No. 1. No comments were received.

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

No payments and/or gifts will be provided to respondents.

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

No assurances of confidentiality are provided.

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.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

Information Collection	Number of Respondents	Frequency of Response	Total Annual Responses	Burden Hours per Response	Total Annual Burden Hrs	Hourly Cost	Total Annual Cost
All Requests to Prepay							
HUD-96001	921,600	1	46,100	1.25	576		
HUD-96002	9,216	1	461	40	18,440	$18.00	$331,920.00
HUD-96003	9,216	1	461	1.25	6	$18.00	$108.00
Totals	**940,032**	**1**	**47,022**	**42.50**	**19,022**		**$332,028.00**

- Number of respondents (46,100 tenants) estimated to complete the form HUD-96001 based on an estimated 100 units per project.
- Hourly cost is based on an estimate for the hired Assessor to conduct the CNA.
- Total responses estimate based on 5% of remaining projects (47,022) that may not have conducted CNA by required statutory deadline.
- No hourly cost/annual cost estimated for tenants.
- Estimated number of respondents (940,032) is based on data obtained from HUD systems for covered projects required to submit CNAs.
- Estimated Hourly Costs for HUD-92002 and HUD-96003 submissions increased from $12.00 to $18.00 to cover overhead and staff time.

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).

There are no additional capital/startup costs associated with the collection of information.

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 also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Estimates of annualized cost to the Federal government

Form	Number of Responses	Staff Hours Per Response	Total Annual Burden Hours	*Cost Per Hour	*Total Annual Cost
HUD-96001	46,100	1	46,100	$27.00	$1,244,700.00
HUD-96002	461	1	461	$27.00	$12,447.00
HUD-96003	461	1	461	$27.00	$12,447.00
Total	47,022		**47,022**		**$1,269,594.00**

*Estimated cost per hour for HUD staff (GS-12) to review and process the documents for this collection.

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

An adjustment has been made based on the current number of respondents.

16. For collection 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 collection of this information will not be published. Information will be maintained with the HUD offices in individual case files.

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.

The expiration date will be displayed on the appropriate forms.

18. Explain each exception to the certification statement identified in item 19 of the OMB 83-I.

There are no exceptions to the Certification Statement identified in item 19 of the OMB 83-I. The certification provisions identified in items a through j have been satisfied within this supporting statement, therefore there are no exceptions to the certification statement.
a. Information is necessary for the Department to ensure that its programs are appropriately administered.
b. This information is not collected under other currently approved information collections.
c. This information has no impact on small entities.
d. The information collection form uses plain, coherent, and unabiguous terminology that is understandable to respondents.
e. The implementation will be consistent and compatible with current reporting and recordkeeping practices.
f. The retention periods for recordkeeping requirements are consistent with HUD policies.
g. It informs respondents of the information called for under 5 CFR 1320.8(b)(3).

(i) The information is being collected in accordance with Title IV of the Housing and Community Development Act of 1992, as amended by the Multifamily Housing Property Disposition Reform Act of 1994 (P.L. 103-233), and Section 531 of the Department of Veterans Affairs and Housing and Urban Development, and Independent Agencies Appropriations Act, 1998, P.L. 105-65 (approved October 27, 1997), which demonstrates to the Secretary capital grant assistance for rehabilitation needs for the project.

(ii) The information is being collected to ensure that the property is adequately managed in accordance with HUD policies and guidelines.

(iii) The burden hour estimate is 19,022.

(iv) The nature of the response is mandatory.

(v) The information collected is not of a confidential nature, therefore the Department does not assure confidentiality to respondents.

(vi) This collection does require a form or format, therefore, a valid OMB control number for this collection will be displayed.

(h.) The HUD field offices will monitor the information. There are adequate staff and resources necessary for managing the use of this information.
(i.) No statistical methodology is involved with this collection.
(j.) The Office of Asset Management is utilizing all available information technology for this effort.

B. Collections of Information Employing Statistical Methods

There are no plans to use statistical methods for the collection of this information.