

# 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: <b>U.S. Department of Housing and Urban Development</b> Office of Public and Indian Housing	2. OMB Control Number: a. <b>2577-0192</b> b. <input type="checkbox"/> None
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3. Type of information collection: (check one) a. <input type="checkbox"/> New Collection b. <input type="checkbox"/> Revision of a currently approved collection c. <input type="checkbox"/> Extension of a currently approved collection d. <input type="checkbox"/> Reinstatement, <b>without change</b> , of previously approved collection for which approval has expired e. <input type="checkbox"/> Reinstatement, <b>with change</b> , of previously approved collection for which approval has expired f. <input type="checkbox"/> 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. <input type="checkbox"/> Regular b. <input type="checkbox"/> Emergency - Approval requested by c. <input type="checkbox"/> Delegated  5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities? <input type="checkbox"/> Yes <input type="checkbox"/> No  6. Requested expiration date: a. <input type="checkbox"/> Three years form approval date    b. <input type="checkbox"/> Other (specify)
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7. Title:  
**Requirements for Designating Housing Projects**

8. Agency form number(s): (if applicable)  
None

9. Keywords:  
Housing, low-income and moderate income housing, public housing, elderly and disabled families

10. Abstract:  
This information collection is required by the Housing and Community Development Act of 1992. Public Housing Agencies (PHAs) will submit an application which is composed of an Allocation Plan and a Supportive Services Plan to designate a project for occupancy by elderly and disabled families. HUD will use the information in the Plans to evaluate a PHA's request for designated housing.

11. Affected public: (mark primary with "P" and all others that apply with "X") a. Individuals or households      e. Farms b. Business or other for-profit      f. Federal Government c. Not-for-profit institutions      g. <b>P</b> State, Local or Tribal Government	12. Obligation to respond: (mark primary with "P" and all others that apply with "X") a. Voluntary b. <b>P</b> Required to obtain or retain benefits c. Mandatory
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13. Annual reporting and recordkeeping hour burden: a. Number of respondents      205 b. Total annual responses      205 Percentage of these responses collected electronically      0% c. Total annual hours requested      2,872 d. Current OMB inventory      2,872 e. Difference (+,-) f. Explanation of difference: 1. Program change: 2. Adjustment:	14. Annual reporting and recordkeeping cost burden: (in thousands of dollars) 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:      0 2. Adjustment:      0
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15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X") a. <b>P</b> Application for benefits      e. Program planning or management b. Program evaluation      f. Research c. General purpose statistics      g. <b>X</b> Regulatory or compliance d. Audit	16. Frequency of recordkeeping or reporting: (check all that apply) a. <input type="checkbox"/> Recordkeeping      b. <input type="checkbox"/> Third party disclosure b. <input type="checkbox"/> Reporting: 1. <input type="checkbox"/> On occasion      2. <input type="checkbox"/> Weekly      3. <input type="checkbox"/> Monthly 4. <input type="checkbox"/> Quarterly      5. <input type="checkbox"/> Semi-annually      6. <input type="checkbox"/> Annually 7. <input type="checkbox"/> Biennially      8. <input type="checkbox"/> Other (describe)
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17. Statistical methods: Does this information collection employ statistical methods? <input type="checkbox"/> Yes <input type="checkbox"/> No	18. Agency contact: (person who can best answer questions regarding the content of this submission) Name: Nicole Faison Phone: (202) 708-0744
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## 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). appear 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.

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Signature of Program Official:

X

Date:

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Signature of Senior Officer or Designee:

Date:

X  
Wayne Eddins, Departmental Reports Management Officer,  
Office of the Chief Information Officer

# Supporting Statement for Paperwork Reduction Act Submissions

## A. Justification

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.

Section 7 of the United States Housing Act of 1937 (42 U.S.C. 1437e) requires a public housing agency (PHA) to submit a proposed designated housing/allocation plan (Plan) which encompasses supportive services; see Section 7(d) (1)(c) of the Act. If the agency wishes to designate a project(s) for elderly families, disabled families, or elderly and disabled families they must submit a comprehensive Plan.

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.

The information collection is used by HUD to determine if a PHA's Plan for designation complies with statutory requirements. It also is used to monitor the agency's compliance with statutory requirements. The information collection is performed at the initiative of the PHA. It is submitted once. It contains information about the PHA's projects, tenant body, and waiting list that the PHA has gathered already as part of its day-to-day operations. The other information it needs can be obtained from other local public or private organizations. Section 7(f)(2) states that PHAs may renew their initial Plans after five years by submitting the information that is needed to update their Plans to HUD. (Thereafter, they may renew every two years.)

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.

PIH has included the automation of this collection in its requests for upgrades to the Public Housing Information Center (PIC). Such requests are subject to the availability of IT funds and established IT and automation priorities. Due to relatively low volume of response/burden, this request is not yet funded.

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 is no duplication of information since it is an original Plan produced by the PHA.

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 will not have a significant economic impact on the PHA.

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.

A PHA wishing to designate is required by Section 7 to submit the Plan (the information collection) to HUD. If the information collection is not submitted, HUD will not be able to determine if the PHA's Plan for project designation complies with the statutory requirements. The initial Plan is submitted once and, therefore, cannot be submitted 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 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;
  - requiring 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;
  - 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;
  - requiring the use of a 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
  - requiring 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.

The information collection is performed at the initiative of the PHA. It is submitted once. It contains information about the PHA's projects, tenant body, and waiting list that the PHA has gathered already as part of its day-to-day operations. The other information it needs can be obtained from other local public or private organizations. Section 7(f)(2) states that PHAs may renew their initial Plans after five years by submitting the information that is needed to update their Plans to HUD. (Thereafter, they may renew every two years.) Most PHAs keep data on their projects, tenants, and applicants for longer than three years to support effective and efficient management operations. PHAs that don't normally do so, and that wish to renew their Plans, may have to retain the information required by the statute for five years. The other items are not applicable.

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 recordkeeping 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.

On June 21, 2007, a Notice of Proposed Information Collection was published in the Federal Register (Vol. 72, No. 119, page 34269) soliciting public comment on the proposed information collection. The comment period closed on August 20, 2007. No comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than reenumeration of contractors or grantees.  
No payment or gift will be made to respondents.
10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy.  
Information about elderly families, disabled families, or elderly and disabled families from the PHA's records, the Consolidated Plan, and from outside sources will be presented as aggregated information in the PHA's Plan.
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. 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 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; and
  - 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.

Variations affecting specific burden estimates among the PHAs:

- \* Size of the PHA.
- \* Size and type (urban, rural, etc.) of the jurisdiction in which the PHA is located.
- \* PHA location (Northeast, Midwest, etc.)
- \* Organizational structure of the PHA.
- \* Number of current projects the PHA has housing elderly, disabled, and/or elderly and disabled families.
- \* Number of projects the PHA plans to designate.
- \* The PHA management of information about its projects, facilities and services, tenant body, and waiting list.
- \* Local availability of alternative housing in the PHA's jurisdiction for low-income elderly, low-income disabled, and low-income elderly and disabled families.

Estimated average burden:

Projects Designated	No. of	Annual	Hrs per	Total
for:	Rspndnts	Rspns	Rspns	Hrs

Elderly Families	160	1	15	2,400
Disabled Families	10	1	12.2	122
Elderly and Disabled Families	35	1	10	350
Total	205			2,872

Estimated Annualized Costs: 2872 X \$30.00 = \$86,160

The estimated average burden hours remain consistent. Program offices keep a log of all active Plans. This log can be found at: <http://www.hud.gov/offices/pih/programs/ph/dhp/>

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers 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 purchase of services 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.

There are no additonal costs to PHAs.

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.

Each Plan is reviewed by the Office of Public Housing Programs, Field Office of Public Housing, and by the Office of FHEO in Headquarters and the Field. A complete review for each Plan submitted requires and estimated 21 hours (analysis consultation with other HUD staff, preparation of approval/disapproval letters, producing a PHA-profile with tenant data from HUD's Multi-Family Tenant Data System, packaging the HUD response for signature, preparing a periodic report on the status of the Plans, reviewing the material prepared by the analyst and support staff prior to signing the letter to the PHA, administrative/operational activities, etc.).

Estimated Annualized Costs: 2872 X \$30.00 = \$86,160

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

No Changes or adjustments are reported in Items 13 and 14 of the OMB Form 83-I.

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.

There will be no publication of information collections.

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 OMB Number and Expiration Date will be added in the HUD Notice which will extend the requirements for designation of public housing projects.

18. Explain each exception to the certification statement identified in item 19.

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 collection of information will not be used for statistical purposes.