
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:

Date:

X
Michael E. Winiarski, Deputy Director, Organizational Policy, Planning and Analysis Division, HROA

Signature of Senior Officer or Designee:

Date:

X
Lillian Deitzer, Departmental Reports Management Officer,
Office of the Chief Information Officer

Supporting Statement for Paperwork Reduction Act Submissions

HUD MULTIFAMILY ENERGY ASSESSMENT OMB 2502-

A. Justification

1. Section 154 of the Energy Policy Act of 2005 (Public Law 109-58) directs HUD to develop and implement an integrated strategy to reduce utility expenses through cost-effective energy conservation and efficiency measures and energy efficient design and construction of public and assisted housing. In support of these requirements, the Department has developed the form HUD-9614, HUD Multifamily Energy Assessment, to assist owners with surveying energy needs to adopt measures that will reduce energy consumption and utility expenses, which ultimately will ensure continued affordability of multifamily housing. In addition, this collection will assist monitoring the Department's energy strategy and will be used for inclusion in the Department's biannual reporting requirements to Congress as required by Section 154 of the Energy Policy Act of 2005.

Section 154 of the Energy Policy Act of 2005 (Public Law 109-58) directs HUD to develop and implement an integrated strategy to reduce utility expenses through cost-effective energy conservation and efficiency measures and energy efficient design and construction of public and assisted housing. In support of these requirements, the Department has revised its administrative policies in HUD Handbook 4350.1, REV-1, Chapter 12, Energy Conservation, and included a new form HUD-9614, HUD Multifamily Energy Assessment. The form is designed to assist owners/agents with identifying areas that can reduce energy consumption and utility expenses and ultimately reduce subsidy costs and ensure continued affordability of multifamily housing. These energy conservation methods should assist the owner/agent with determining cost effective energy efficient upgrades and point out maintenance items (window re-caulking for example), any of which can help reduce energy usage.

This information is voluntary with the exception of budget-based rent increase requests. As part of the budget-based rent increase submission to HUD, the owner/agent must submit the Multifamily Energy Assessment Survey, Energy Conservation Plan, and/or other related information to determine reasonable utility cost levels. Once the information is received by HUD (along with the other submission requirements for budget-based rent increase requests in HUD Handbook 4350.1, REV-1, Chapter 7), HUD staff reviews the utility cost information to ensure that the owner/agent has analyzed utility rates and requested rates most advantageous to the project. This review, in conjunction with reviewing the Multifamily Energy Assessment Survey, Energy Conservation Plan, and/or any other related information will be used by HUD to approve/disapprove the utility expense portion of the budget-based rent increase request.

HUD uses various monitoring methods and tools in its oversight of HUD related properties; including, but not limited to, on-site management reviews, receipt and analysis of annual audited financial statements, uniform physical condition assessments, and property risk assessments.

This collection will also assist with monitoring the Department's energy strategy and will be used for inclusion in the Department's bi-annual reporting requirements to Congress as required by Section 154 of the Energy Policy Act of 2005.

2. There are approximately 10,695 multifamily housing projects subject to this collection. HUD estimates that 10 percent (1,070) of these project owners may request a Comprehensive Technical Audit (CTA), the owner's evaluation of the CTA, and the development of the Energy Conservation Plan (ECP). Of the 1,070

that request a CTA, approximately 5 percent (54) may convert to tenant-paid utilities. Conversion to tenant-paid utilities requires statements from the utilities. HUD estimates that there are 3 utility companies per state (150 utility companies) and each utility company may provide 2 such statements. Conversion to tenant paid utilities also requires solicitation and review of tenant comments. HUD estimates that each of the 54 affected projects will have an average of 100 tenants (5,400), but that only 50 percent will actually comment. All 5,400 will require a revised lease.

The form HUD-9614 will be used to assist multifamily housing project owners with assessing energy needs, determining the necessary upgrades to the property, and adopting energy conservation methods that will meet cost-effective energy efficiency standards and reduce utility costs and operating expenses. At the owner's discretion, a Comprehensive Technical Energy Audit (CTEA) may be performed by a licensed professional engineer or certified energy auditor. The CTEA is an extensive energy audit that will assist the owner with determining the most cost effective, as well as practical energy efficient replacements that can be funded based on available financing. This type of audit requires a higher degree of technical expertise than that normally found on the immediate staff of the owner/ management agent and is normally used in conjunction with implementing capital improvements.

Owners are not required to submit the form HUD-9614 to HUD for review. This collection relies primarily on voluntary actions of the owner and HUD encourages owners to adopt energy conservation methods because of the benefits (cost savings) to both the owner and the Department. However, this collection is mandatory when owners request a budget-based rent increase (approved under 2502-0324), which requires the owner to submit a status report on implementing an energy conservation plan. Owners are only required to retain the results of the energy assessment or other documentation to review upon request during an on-site management review or other on-site visit.

3. Automation of this information collection is not feasible because the energy assessment requires the owner or owner's staff to physically walkthrough the project and assess energy needs. In addition, HUD requires the owner to submit a certification of compliance and/or status report on implementing an energy conservation plan with the owner's request for a rent increase (currently approved under 2502-0324). Further, in cases where the owner requests a conversion from master metered utilities to individually metered (tenant-paid) utilities, the owner must provide additional documentation including a statement from the utility company, a copy of the project's latest form of compliance documentation and time frames and must address the comments received during the tenant review process. Once the utility conversion is approved, the owner must amend the tenant leases and execute an amended regulatory agreement with HUD. These procedures cannot be automated.
4. There is no duplication of other sources for this information.
5. The collection of information may involve small business or other small entities.
6. HUD would be in noncompliance with Section 154 of the Energy Policy Act of 2005 if this information were not collected or collected less frequently. Additionally, increased energy costs may result in higher costs to owners and HUD.
7. There are no special circumstances for respondents.
8. Information collected is conducted in a manner consistent with the guidelines of 5 CFR 1320.8 (d). The Notice announcing this collection of information appeared in the Federal Register on May 29, 2007. No comments were received.
9. There are no payments or gifts to respondents.

10. No assurance of confidentiality, statute, regulation, or agency policy is provided.

11. There are no questions of a sensitive nature.

12. Annual Burden Estimate:

Information Collection	Number of Respondents	Frequency of Response	Total Annual Responses	Burden Hours per Response	Total Annual Burden Hrs	Hourly Cost	Total Annual Cost
Estimate Number of Applicable Projects – 10,695							
1. Form HUD-9614	10,695	1	10,695	4	42,780	\$20	\$855,600
2. Owner Submission of Certification of Compliance (Required for Budgeted Rent Increase)	10,695	1	10,695	.25	2,674	\$20	53,480
Subtotal	10,695		21,390		45,454		909,080
3. Comprehensive Technical Energy Audit	1,070	1	1,070	8	8,560	\$25	214,000
4. Owner's Evaluation of the Auditor's proposals (if Comprehensive Technical Energy Audit is Performed)	1,070	1	1,070	2	2,140	\$20	42,800
5. Energy Conservation Plan (if Comprehensive Technical Energy Audit is Performed)	1,070	1	1,070	2	2,140	\$20	42,800
Subtotal	1,070		3,210		12,840		299,600
6. Utility Conversion Request	54	1	54	3	162	\$20	3,240
7. Owner Review of Tenant Comments (Required for Utility Conversion)	54	2,700	145,800	1	145,800	\$20	2,916,000
8. Owner Execution of Amended Regulatory Agreement (Required for Utility Conversion once approved by HUD)	54	1	54	.25	14	\$20	280
9. Revisions to Lease Agreements (Required for Utility Conversion once approved by HUD)	54	100	5,400	2	10,800	\$20	216,000
Subtotal	54		151,308		156,776		3,135,520
Subtotal Project Owners	10,695		175,908		215,070		4,344,200
10. Statement from the Utility Company(s) (Required for Utility Conversion)	150	2	300	1	300	\$20	6,000
Subtotal Utilities	150		300		300		6,000
11. Tenant Comments (Required for Utility Conversion)	5,400	varies	2,700	1	2,700	\$20	54,000
Subtotal Tenants	5,400		2,700		2,700		54,000
Totals	16,245		178,908		218,070		\$4,458,200

Hourly cost is based on an estimate of the owner or owner's staff to perform the energy assessment (form HUD-9614 or similar format) and prepare the necessary documents if developing an energy conservation plan or requesting a utility conversion. The hourly cost is increased for conducting the energy audit because the owner/agent would require the services of a licensed professional engineer or certified energy auditor to conduct the CTEA. Hourly estimated costs estimate obtained from payscale.com.

13. There are no additional costs to respondents.

14. Annual Cost to the Federal Government:

Information Collection	Number of Responses	Hours per Response	Total Annual Hours	Hourly Cost	Total Annual Cost
HUD-9614 and/or all other documents	178,908	1	178,908	\$36.26	\$6,487,204

Estimated hourly cost is based on the annual salary of a GS-12 Project Manager for reviewing the information.

15. This is a new collection resulting in a program change. Section 154 of the Energy Policy Act of 2005 (Public Law 109-58) directs HUD to develop and implement an integrated strategy to reduce utility expenses through cost-effective energy conservation and efficiency measures and energy efficient design and construction of public and assisted housing. In support of these requirements, the Department has developed the form HUD-9614, HUD Multifamily Energy Assessment, to assist owners with surveying energy needs to adopt measures that will reduce energy consumption and utility expenses, which ultimately will ensure continued affordability of multifamily housing. In addition, this collection will assist monitoring the Department's energy strategy and will be used for inclusion in the Department's biannual reporting requirements to Congress as required by Section 154 of the Energy Policy Act of 2005.
16. The results of this collection will not be published.
17. HUD is not requesting approval to avoid displaying the expiration date.
18. No exceptions to the certification statement identified in Item #19 on form OMB 83-I, "Certification for Paperwork Reduction Act Submissions."

B. Collections of Information Employing Statistical Methods

This information collection does not employ statistical methods.