

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 Housing/Office of Multifamily Housing Programs/Office of Asset Management	2. OMB Control Number: a. 2502-0342 b. 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 checked="" type="checkbox"/> Extension of a currently approved collection d. <input type="checkbox"/> Reinstatement, without change , of previously approved collection for which approval has expired e. <input type="checkbox"/> Reinstatement, with change , 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 checked="" 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 checked="" type="checkbox"/> No 6. Requested expiration date: a. <input checked="" type="checkbox"/> Three years from approval date b. <input type="checkbox"/> Other (specify)
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7. Title:
Pet Ownership in Assisted Rental Housing for the Elderly or Handicapped

8. Agency form number(s): (if applicable)
Not applicable

9. Keywords:
Housing, Rental Housing, Assisted Housing, Household Pets, Recordkeeping

10. Abstract:
Information is distributed to tenants of assisted rental housing units detailing guidelines for pet ownership. The information is necessary for owner compliance with nondiscrimination in federally assisted rental housing for the elderly or handicapped for pet ownership.

11. Affected public: (mark primary with "P" and all others that apply with "X") a. P Individuals or households e. Farms b. X Business or other for-profit f. Federal Government c. X Not-for-profit institutions 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
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13. Annual reporting and recordkeeping hour burden: <table style="width:100%; border-collapse: collapse;"> <tr><td>a. Number of respondents</td><td style="text-align: right;">128,656</td></tr> <tr><td>b. Total annual responses</td><td style="text-align: right;">781,191</td></tr> <tr><td> Percentage of these responses collected electronically</td><td style="text-align: right;">0</td></tr> <tr><td>c. Total annual hours requested</td><td style="text-align: right;">350,700</td></tr> <tr><td>d. Current OMB inventory</td><td style="text-align: right;">28,671</td></tr> <tr><td>e. Difference (+,-)</td><td style="text-align: right;">+322029</td></tr> <tr><td>f. Explanation of difference:</td><td></td></tr> <tr><td> 1. Program change:</td><td></td></tr> <tr><td> 2. Adjustment:</td><td style="text-align: right;">+322029</td></tr> </table>	a. Number of respondents	128,656	b. Total annual responses	781,191	Percentage of these responses collected electronically	0	c. Total annual hours requested	350,700	d. Current OMB inventory	28,671	e. Difference (+,-)	+322029	f. Explanation of difference:		1. Program change:		2. Adjustment:	+322029	14. Annual reporting and recordkeeping cost burden: (in thousands of dollars) Do not include costs based on the hours in item 13. <table style="width:100%; border-collapse: collapse;"> <tr><td>a. Total annualized capital/startup costs</td><td style="text-align: right;">\$0.00</td></tr> <tr><td>b. Total annual costs (O&M)</td><td style="text-align: right;">\$0.00</td></tr> <tr><td>c. Total annualized cost requested</td><td style="text-align: right;">\$0.00</td></tr> <tr><td>d. Total annual cost requested</td><td style="text-align: right;">\$0.00</td></tr> <tr><td>e. Current OMB inventory</td><td style="text-align: right;">\$0.00</td></tr> <tr><td>f. Explanation of difference:</td><td></td></tr> <tr><td> 1. Program change:</td><td></td></tr> <tr><td> 2. Adjustment:</td><td></td></tr> </table>	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:	
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15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X") a. Application for benefits e. Program planning or management b. Program evaluation f. Research c. General purpose statistics g. P Regulatory or compliance d. Audit	16. Frequency of recordkeeping or reporting: (check all that apply) a. <input checked="" type="checkbox"/> Recordkeeping b. <input type="checkbox"/> Third party disclosure c. <input checked="" 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 checked="" type="checkbox"/> Annually 7. <input type="checkbox"/> Biennially 8. <input checked="" type="checkbox"/> Other (describe) As required based on events in item 12 of the supporting statement.
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17. Statistical methods: Does this information collection employ statistical methods? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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
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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) 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 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

Pet Ownership in Assisted Rental Housing for the Elderly or Handicapped 2502-0342

A. Justification

1. The information is collected to carry out the regulations that allow tenants in elderly or handicapped rental projects to be pet owners. The regulations require the following:
 1. Owners/agents are prohibited from discriminating or restricting a prospective tenant's admission to housing due to ownership of a common household pet.
 2. Owners/agents are prohibited from discriminating against a tenant's continued occupancy due to the presence of a common household pet in their dwelling unit.
 3. Owners/agents are required to establish reasonable pet rules according to established regulations.

Statute: Section 227 of the Housing and Urban-Rural Recovery Act of 1983 P.L. 98-181.

Regulations: Pet Ownership in Housing for the Elderly or Handicapped: 24 CFR 5.300 through 5.363

Administrative Requirements: HUD Handbook 4350.1, REV-I, Chapter 32

Copies of these statutory/regulatory/and administrative requirements are attached.

2. This information is collected and reviewed to ensure that owners do not discriminate against current and prospective elderly and disabled tenants because due to ownership of a pet. The paperwork items below are either collected from the tenant by the owner/manager, or provided by the owner to the tenant. The paperwork is not submitted to HUD for review, however pet policies and pet deposit/refund procedures may be reviewed during an on-site monitoring review to ensure compliance.

Paragraphs (a) and (b) of 243.15 entitled "Notice to Tenants" identify the requirement of the project owner to inform the tenant of the pet ownership approval, and the rules under which such approved will be granted; applies to new applicants when he or she is offered a dwelling unit.

Paragraph (b)(4) of 243.20 of the pet rules established the requirement for the pet owner to register the pet with the project manager annually.

Paragraph (c) of 243.22 allows for consultation between the pet owner and the project owner orally or in writing concerning items in the rules governing pet ownership. This occurs when the pet rules are first set (pet rules should be in place for all projects except for new projects). Consultation also occurs when the pet rules are amended.

Paragraphs (a) and (b)(2) of 243.24 provide for actions by the pet owner and the project owner to either remove a pet because of a violation of the rules, or to notify the pet owner that such action should be taken. This occurs occasionally.

The requirements allow owners to require pet owners to pay a refundable security deposit. Service animals are exempt from this provision.

3. Full automation of this information collection is not feasible because it requires owners to provide pet policy information to tenants, allows for tenants to submit comments for consideration, and requires signed complaints from tenants in cases where the pet is deemed a nuisance or threat to the health and safety of the tenants.
4. This collection does not duplicate other information collections and there are no similar information collections that can be used for the purposes as described in item 2 above.
5. The collection of this information does not impact small businesses.
6. If this information were not collected, it would result in a high number of discrimination complaints due to pet ownership by elderly persons and persons with disabilities who require assistive or companion animals for medical reasons.
7. There are no special circumstances involving this information collection.
8. Information collected is conducted in a manner consistent with the guidelines of 5 CFR 1320.6. The Notice announcing this collection of information appeared in the Federal Register on June 22, 2007 (Vol. 72, No. 120, page 34474). No comments were received.
9. There will be no gifts or payments given to respondents.
10. The Department does not assure confidentiality to respondents because none of the information collected is considered confidential.
11. There is no information of a sensitive nature being requested.

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 – 11,696							
Tenant Estimates							
1. Tenant Certification/Registration of Pet for Disability Exclusion (Assistive Animals)	58,480	1	58,480	.25	14,620	\$20	\$292,400
2. Tenant Submission of Comments on Proposed Pet Rules	116,960	1	116,960	.50	58,480	\$20	\$1,169,600
3. Signed, Written Complaint from Tenant (In cases where the pet is deemed a nuisance or threat to health and safety, if applicable)	35,088	1	35,088	.25	8,772	\$20	\$175,440
Subtotals	116,960		210,528		81,872		\$1,637,440
Owner Estimates							
4. Owner Notification to Tenant of Refusal to Register a Pet	585	5	2,925	.25	731	\$20	\$14,620
5. Owner Notification to Tenant of Pet Rule Violation	585	5	2,925	.25	731	\$20	\$14,620
6. Owner Notice to Tenant of Pet Removal	585	3	1,755	.25	439	\$20	\$8,870
7. Owner Development of Proposed Pet Rules	11,696	1	11,696	1	11,696	\$20	\$233,920
8. Owner Distribution of Proposed Pet Rules to Tenants	11,696	1	11,696	.25	2,924	\$20	\$58,480
9. Owner Review of Tenant Comments on Proposed Pet Rules	11,696	25	292,400	.50	146,200	\$20	\$2,924,000
10. Owner Development of Final Pet Rules	11,696	1	11,696	1	11,696	\$20	\$233,920
11. Owner Distribution of Final Pet Rules to Tenants	11,696	1	11,696	.25	2,924	\$20	\$58,480
12. Owner Amendment of Pet Rules (if applicable)	234	varies	472	.50	236	\$20	\$4,720
13. Owner Distribution of Amended Pet Rules to Tenants (if applicable)	234	100	23,400	.25	5,850	\$20	\$117,000
14. Owner Revisions to Lease Agreements	11,696	1	11,696	.50	5,848	\$20	\$116,960
15. Owner Refund of Pet Deposit	11,696	5	58,480	.25	14,620	\$20	\$292,400
Subtotals	11,696		440,837		203,895		\$4,077,990
Owner/Tenant Estimates							
16. Owner/Tenant Meeting to Discuss Alleged Pet Rule Violation	1,170	1	1,170	.50	585	\$20	\$11,700
17. Owner/Tenant Meeting to Discuss Proposed Pet Rules	128,656	1	128,656	.50	64,348	\$20	\$1,286,960
Subtotals			129,826		64,933		\$1,298,660
TOTALS	128,656		781,191		350,700		\$7,014,090

Item 1 – Number of respondents (tenants) is based on an estimate of 5% of the total tenants (1,169,600) that may have pets and would qualify for the exclusion for animals to assist with the disabled (guide dogs for persons with vision impairments, hearing dogs for persons with hearing impairments, and emotional support animals for persons with chronic mental illness) and would be required to submit the certification. The estimated total number of respondents was determined based on an average of 100 tenants per project for each project owner (11,696), which totals 1,169,600.

Item 2 - Number of respondents (tenants) is based on 10% of the estimate number of total number of affected tenants (1,169,600) that may submit comments on the owner’s proposed pet rules.

Item 3 - Number of respondents (tenants) is based on 3% of the estimate number of total number of affected tenants (1,169,600) that may submit signed, written complaints to owners regarding pets at the project that are a nuisance and/or pose health and/or safety concerns.

Subtotal - Estimates in item 2 also includes same respondents in items 1 and 3.

Item 4 - Number of respondents (owners) is based on an estimate of 1% of the total tenants in item 1 (58,480) that may require the owner to distribute annual notifications to tenants for refusing to register the pet. The frequency is estimated at about 5 times per year.

Item 5 – Number of respondents (owners) is based on an estimate of 1% of the total tenants in item 1 (58,480) that may require the owner to distribute annual notifications to tenants for pet rule violations. The frequency is estimated at about 5 times per year.

Item 6 - Number of owners that would be required to notify tenants of the intent to remove the pet is based on the estimate of 1% of the total number of tenants in item 1 (58,480).

Item 7 - Number of respondents (owners) is based on the total estimated number of applicable projects that must adhere to HUD’s pet procedures and develop pet rules.

Item 8 - Number of respondents (owners) is based on the total estimated number of applicable projects that would be required to distribute or post the proposed pet rules for comment.

Item 9 - Number of respondents (owners) is based on the total number of applicable projects that may receive tenant comments for review. Estimated frequency is based on about 25% response.

Item 10 - Number of respondents (owners) is based on the total number of applicable projects that would be required to finalize the pet rules after reviewing and considering all tenant comments.

Item 11 - Number of respondents (owners) is based on the total estimated number of applicable projects that would be required to distribute the final pet rules to tenants.

Item 12 - Number of respondents (owners) is based on 2% (234) of the total estimated number of applicable project owners (11,696) may need to amend the pet rules.

Item 13 - Number of respondents (owners) is based on 2% (234) of the total estimated number of applicable project owners (11,696) that would be required to distribute the amended pet rules to tenants.

Item 14 - Number of respondents (owners) is based on the total number of applicable project owners that may be required to revise the lease agreements to include the pet rules or amended pet rules.

Item 15 - Number of respondents (owners) is based on the total number of applicable projects that may be required to refund pet deposits to tenants. Frequency is estimated at about 5 year.

Subtotal - Estimates in item 7 also includes total number of owners and includes the same respondents in items 4, 5, 6, 8, 9, 10, 11, 12, 13, 14, and 15.

Item 16 – Number respondents includes the owners (585) that would be required to meet with tenants (585) to discuss the violation of the pet rules (1,170) based on the estimated violations in items 4, 5, and 6.

Item 17 - Number of respondents includes estimated number of owners (11,696) that would be required to meet with tenants (estimated at 10% of the total 1,169,600, which equals 116,900) to discuss the proposed pet rules.

Subtotal – Not included. Same respondents already reported in items 2 and 7.

All Items - Hourly cost is based on an estimate of the owner or owner’s staff to perform the functions as required by the statute and HUD’s pet policy procedures. Hourly estimated costs estimate obtained from payscale.com.

13. There are no additional capital or start-up costs. However, most of the paperwork burden occurred when the laws and regulations were first implemented. The collection of paperwork is more time consuming for new projects as they set pet rules and occurs sporadically in established projects.

14. Annual Cost to Federal Government:

Information Collection	Number of Responses	Hours per Response	Total Annual Hours	Hourly Cost	Total Annual Cost
On-site monitoring review of pet policy compliance (on-site review approved under OMB 2502-0178)	11,696	1	11,696	\$27.00	\$315,792

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

15. There are no program changes; however adjustments were made to the number of respondents, responses, and burden hours based on current data in HUD systems which resulted in an increase from the previous submission.

16. The results of this reporting will not be published.

17. HUD is not seeking approval to not display the expiration date for OMB approval of the information collection.
18. There are no exceptions to the Certification Statement identified in item 19.

B. Collections of Information Employing Statistical Methods

There are no statistical methods used in this collection.