



## 19. Certification for Paperwork Reduction Act Submissions

On behalf of this Federal Agency, 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.

Signature of Program Official:  X Michael F. Hill, Deputy Assistant Secretary for Operations, HR	Date:
Signature of Senior Officer or Designee:  X Lillian L. Deitzer, Departmental Reports Management Officer Office of Investment Strategies, Policy, and Management, Office of the Chief Information Officer	Date:

**Supporting Statement for Paperwork Reduction Act Submissions**  
**Recertification of Family Income and Composition, Section 235(b) and**  
**Statistical Report Section 235(b), (i), and (j)**  
**2502-0082**  
**HUD-93101 and HUD-93101-A**

**A. Justification**

1. Section 235 of the National Housing Act (P.L. 479, 48 Stat. 1246 12 U.S.C. 1701 (et seq.)), applicable portions attached for references, authorizes the Secretary of the Department of Housing and Urban Development to make assistance payments to qualified homeowners annually (or more frequently as deemed necessary).
2. The Form HUD-93101 is sent by lenders to individual borrowers to determine and adjust the amount of subsidy a mortgagor is eligible to receive. It is used for securing re-certifications. The forms serve as vehicles for obtaining the information necessary to determine family income and composition, and to compute assistance under HUD guidelines. The Section 235 program is diminishing each year with approximately 3,500 235 mortgages still receiving subsidy. Congress last provided authority for 30-year mortgages to receive subsidy in 1983. The HUD-93101-A form is no longer submitted to HUD by lenders for statistical analysis of increase and decrease in subsidy and general program information. Mortgagees maintain copies of both forms HUD-93101 and 93101-A for audit purposes.
3. The mortgagee utilizes computer methods and programs to satisfy the need to calculate the amount of subsidy the mortgagor is eligible to receive. The homeowner is not required to use any automated techniques. The program response is diminishing as the program is being phased out. Development of an automated system for automated transactions would not be cost beneficial.
4. The information is reviewed periodically to identify duplication. No similar information is readily available.
5. Small businesses or other small entities are not respondents.
6. This information collected is needed so that annual re-certifications of homeowners by lenders will not result in overpayment of Federal assistance.
7. The reporting frequency cannot be reduced because any reduction could result in overpaid assistance. Reporting frequency is timed to establish changes in income. Statute requires at a minimum, annual re-certifications to adjust the amount of subsidy a mortgagor is eligible to receive.
8. The final rule will be published in the Federal Register following OMB's review. The 60-day comment period for the information collection requirement was included in the proposed rule and is while revised in this final rule remains in substantial conformity with the proposed rule.
9. No gifts or payments will be provided to respondents.
10. There is a Privacy Act Statement on the information collection, form HUD-93101.
11. No questions of a sensitive nature are involved.

12. The total respondents for form HUD-93101 equals 3,500, (these are completed by the mortgagors requesting continuation of subsidy), and **the same number of forms HUD-93101-A** are handled by mortgagees to evaluate how much subsidy that each mortgagor is entitled to. Annualized costs to the respondents totals \$108,570 (4,935 X \$22), which includes staff (basically clerical), preparation of information collection, overhead, printing, etc. The cost is approximately \$22 an hour.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hours Per Response	Annual Burden Hours	Hourly Cost	Annual Cost
Recertification of Family Income and Composition (HUD form 93101)	3,500	Once per loan	3,500	1.25	4,375	\$22.00	96,250
Recertification of Family Income Statistical Report (HUD form 93101-A)				.16	560		12,3200
TOTALS	3,500		3,500		4,935		\$108,570

13. There is no additional capital start up costs to the respondents.

14. Annualized cost to the Federal Government totals \$0.00 –because the Federal Government does not complete either form.

15. This is an extension of a currently approved collection. The adjustment reported in Item 23 of the OMB 83-I is because the program response is diminishing as the program is being phased out.

16. No plans to publish this information for statistical use.

17. HUD is not seeking approval to avoid displaying the expiration date for the OMB approval.

18. There are no exceptions to the certification statement identified in item 19 of the OMB 83-I.

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

Not applicable. The collection of information does not employ statistical methods.