

## Supporting Statement for Information Collection Homeownership Program for Public Housing Reporting

### A. Justification

1. 24 CFR Part 906-Section 5(h) Homeownership Program was authorized by sections 5(h) and 6(c)(4) (D) of the U.S. Housing Act of 1937 (Act). The program was replaced by Section 32 of the Act through the Quality Housing and Work Responsibility Act of 1998 (2577-0233). Section 32 allows existing 5(h) plans to be implemented as originally approved. The burden is only for implementation of existing programs. The sections in the regulation that impose information collection requirements are as follows:

Section 906.17 (as applies to section 5(h) homeownership programs. This rule has been replaced for Section 32 programs; the prior version is still in effect for section 5(h), see attached), requires Public Housing Authorities (PHAs) to maintain records (including sales and financial records) for all activities incident to implementation of the HUD-approved homeownership plan. PHAs are required to submit to HUD the dates on which each public housing unit number/address approved under Section 5(h) is sold. The information is used to report homeownership sales to Congress and to adjust PHA's formula allocation funding.

2. The regulation and the underlying statute do not impose a time limit for program implementation. Under the initial Section 5(h) homeownership program, a PHA was required to submit a plan to sell housing to residents. Residents were then required to submit an application to the PHA and the PHA then prepared a detailed plan for the sale. For HUD-approved plans, PHAs will maintain records which may be subject to audit by HUD and the Government Accounting Office (GAO). HUD may review these records to determine the program has been and is being carried out with in accordance with Section 5(h) regulations and laws. Accordingly, individuals, tribal entities, non-profits, and PHAs are all involved with gathering data for this information collection; however, PHAs submit all data to HUD.

3. The information is collected electronically in the Public and Indian Housing Information Center (PIC), through the Inventory Removals module. All units that are scheduled for sale should be already contained in PIC. The dates of the sales of the units are added to PIC, and used to report homeownership sales to Congress and to adjust PHA's formula allocation funding.

4. There is no duplication of effort. Information collected is unique to each PHA development and does not duplicate any similar information. Information collected also serves the need of revising HA subsidy calculations, without additional input from the HA.

5. The information being collected has no significant impact on small businesses or other small entities.

6. Statutory mandates and Federal program requirements would not be met if the collection is not conducted, or is conducted less frequently.

7. There are no special circumstances that would cause the information collection in a manner, which is inconsistent with the guidelines in 5 CFR 1320.8.

8. HUD published a Notice of Submission of Proposed Information Collection in the Federal Register dated February 8, 2008. (Vol. 73, No. 27, Pgs. 7577-7578 No comments were received from the public.

9. No payments or gifts to respondents are provided.

10. Assurance of confidentiality is neither provided nor needed because no personal, proprietary or secure information is collected.

11. No sensitive questions are asked.

12. We estimate that the information collection requirements will have the following reporting burden:

	No. of Respondents	Reference	Freq. Of Response	Total Responses	EST. Avg. Response Time (hrs)	Total Annual Burden	Cost per hour	Total Cost
<b>Reporting</b>	73	24 CFR 906.17	10	730	0.25	182.5	\$27	\$4,927.50
<b>Recordkeeping</b>	73	24 CFR 906.17	10	730	0.05	36.5	\$27	\$985.50
<b>Totals</b>				<b>730</b>		<b>219</b>		<b>\$5,973</b>

\*. This estimate is based upon the number of PHAs that still have units to sell under Section 5(h), times an estimated average of 10 units sold per year per HA. The volume of Section 5(h) units and the rate of sales varies across HAs.

13. There are no additional costs to respondents.

14. We do not estimate that there will be any additional cost to the Federal Government. The applications will be reviewed in accordance with HUD's existing review and monitoring requirements.

15. This is an extension of a currently approved package.

16. This information collection will not be published.

17. HUD does not seek approval to avoid displaying the expiration date.

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

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

This collection of information will not be used for statistical purposes.