
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: X Mike Winiarski, Director, Organizational Policy, Planning and Analysis Division, HROA	Date:
Signature of Senior Officer or Designee: X Lillian Deitzer, Departmental Reports Management Officer	Date:

Supporting Statement for Paperwork Reduction Act Submissions

SUBTERRANEAN TERMITE TREATMENT BUILDER'S CERTIFICATION AND GUARANTEE, AND THE NEW CONSTRUCTION SUBTERRANEAN TERMITE SOIL TREATMENT RECORD OMB Control Number 2502-0525 (HUD-NPCA-99-A & HUD-NPCA-99-B)

A. JUSTIFICATION

1. HUD regulations at 24 CFR 200.926d(b)(3) require that the sites for HUD insured structures must be free of termite hazards. The HUD-NPCA-99-A requires the builder to certify that all required treatment for termites was performed by an authorized pest control company and further that the builder guarantees the treated area against infestation for one year. The form HUD-NPCA-99-B requires a licensed pest control company to provide to the builder a record of specific treatment information in those cases when the soil treatment method is used for prevention of subterranean termite infestation. When applicable the HUD-NPCA-99-B must accompany the HUD-NPCA-99-A.
2. The requested information collections is collected by the builders, pest control companies and submitted to mortgage lenders who are the respondents in this data collection. HUD information is collected to identify items of complaint on FHA insured property to aid the homeowner obtain correction. Identifies builders not conforming to applicable standards. Determine eligibility for financial assistance.
3. The collection of the requested information does involve the use of automated, electronic, mechanical and other forms of information technology. HUD's web-site are available as portable Document Format (PDF) so one can view or print their information on the form.
4. The collected information is not duplicative.
5. The collection of information does not impact small businesses or other small entities. The certification is required of all builders seeking FHA mortgage insurance for newly constructed homes.
6. If the requested data is not collected, new home purchasers and HUD are subject to the risk of purchasing or insuring a home that could be immediately infested by termites and would have no recourse against the builder.
7. No special circumstances are envisioned that would cause the information collection to be conducted in any of the enumerated manners.
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 September 23, 2008 (Volume 73, No. 185; page 54847). ...*comments were received.*

There were consultations with HUD staff in three of the HUD Homeownership Centers.

- a. Willard Cowan of the Atlanta, GA Homeownership Center, (404) 331-5001 Ext 2723
- b. Branch Chief Darlene Shannon of the Philadelphia, PA Homeownership Center, (215) 861-7522
- c. Branch Chief Mary wolf of the Denver Homeownership Center, (303) 672-5280 Ext 1676

The above HUD staff stated that on post technical review Builders Certification forms are review in each endorsed case binder for new construction loans.

9. No payments or gifts are to be provided to respondents.
10. Confidentiality is not assured for the data involved.
11. There are no sensitive questions involved in this collection.
12. Respondent burden & costs:

<u>Information Collection</u>	<u>Number of Respondents</u>	<u>Frequency of Response</u>	<u>Responses Per Annum</u>	<u>Burden Hour Per Response</u>	<u>Annual Burden Hours</u>	<u>Hourly Cost Per Response</u>	<u>Annual Cost</u>
HUD-NPCA-99-A	63,123	1	63,123	.083	5,239	\$24.00	\$124,224
HUD-NPCA-99-B	<u>63,123</u>	1	<u>63,123</u>	.25	<u>15,780</u>	\$24.00	<u>\$516,960</u>
Totals	63,123		126,246		21,019		\$641,184

The 99-A information is collected by the builder and the 99-B information is collected by the pest control company and forwarded to the lender.

13. There are no additional costs to the 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-NPCA-99-A	63,123	1	.083	\$32.00	2,656
HUD-NPCA-99-B	63,123	1	.25	\$32.00	800

Estimated hourly cost is based on the annual salary of a GS-13 Project Manager for reviewing the information.

15. This is an extension of a currently approved collection. The increase is due to the increase of newly constructed home sales with FHA insured mortgages.
16. The information collected will not be published.
17. HUD is not seeking approval to avoid displaying the expiration date for this 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.

This information collection does not employ statistical methods.