
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), 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:

Date:

X
Elizabeth A. Hanson, Deputy Assistant Secretary, Real Estate Assessment Center

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

A. Justification

1. Housing that is insured and/or assisted under certain HUD programs is required to be inspected using the Uniform Physical Condition Standards (UPCS) in accordance with 24 CFR Part 5, Subpart H. These standards are intended to ensure that such housing is decent, safe, sanitary and in good repair. HUD's Section 8 housing, public housing, HUD-insured multifamily housing, and other assisted housing are subject to uniform physical standards. To the extent feasible, the physical inspection procedures by which the standards will be assessed should be uniform in the covered programs.

The UPCS and inspection process is designed to achieve the following three objectives: (1) consistency in physical condition standards for HUD housing; (2) standardization of the inspection to be undertaken to determine compliance with the standards; and (3) implementation of an electronically-based inspection system to evaluate, rate, and rank the physical condition of HUD housing objectively.

Depending on the results of its physical condition inspection, a multifamily property will be assigned one of three designations with the accompanying inspection time lines: (1) standard 1 performing is a property that scores 90 points or higher and will undergo a physical inspection once every three years; (2) standard 2 performing is a property that receives a score of 80 points or higher but less than 90 points and will undergo a physical inspection once every two years; and (3) standard 3 performing is a property that receives a score of less than 80 points and will undergo an annual physical inspection.

Section 502 of the National Affordable Housing Act of 1990, as amended by the Quality Housing and Work Responsibility Act of 1998, implements section 6(j) of the United States Housing Act of 1937. Section 6(j) establishes specific assessment indicators and directs the Secretary to develop additional indicators to assess the management performance of public housing agencies (PHAs) in all major areas of management operations. One of the assessment areas is the Physical Condition Indicator.

All PHAs are required to be assessed under the Physical Condition Indicator by HUD in accordance with the Public Housing Assessment System (PHAS) regulation, 24 CFR part 902, Subpart B. A PHA with 249 or fewer units that is not troubled is required to be assessed under the Physical Condition Indicator biennially, and a PHA that receives a physical condition score of 24 points or higher will not be assessed under this indicator the following year. All other PHAs are assessed on an annual basis.

In order to conduct physical condition inspections of approximately 40,000 multifamily and PHA projects annually, HUD utilizes contract inspectors that are trained in the UPCS protocol and certified by PIH-REAC.

There have not been any substantial changes to the questionnaire. However, due to program changes that reflect a more current status and in consultation with HUD's Office of General Council, changes were made to the last item under "Related Information" on page 4 of the questionnaire to include reinforcing the importance of such information, updating the verbiage for clarification purposes, and adding verbiage providing additional protection to HUD and the federal government.

2. The respondents will be individuals who seek to become HUD certified physical condition inspectors. They provide information to HUD regarding past experience via the Internet using the Inspector Candidate Assessment Questionnaire. This questionnaire provides PIH-REAC with basic knowledge of an individual's inspection skills and abilities. For example, the ability to use the Internet is desirable in order to upload inspection reports to PIH-REAC.

3. This form is completely automated and submitted via the Internet. The electronic submission of this data results in significant benefits, such as cost savings from reduced need for paper submission; and faster HUD review and analysis. In addition, electronic submission reduces the administrative burden that manual submission presents to HUD program participants and HUD staff alike.
4. There will be no duplication of information. There is no similar information already available that may be used or modified for the purpose described in the response to question 2, above.
5. This collection of information does not impact small businesses or other small entities. HUD believes that these costs are minimal since the submission of the questionnaire is via the Internet.
6. The requirement for the physical inspection of multifamily and public housing properties is statutory and regulatory. Due to the volume of physical inspections conducted annually by HUD, is it most cost effective to use contract inspectors. Without the physical inspections, HUD's interest (as well as the interest of taxpayers) will be unprotected and HUD will not be able to identify the risks due to neglected maintenance or insolvency of a multifamily or public housing property. Furthermore, evaluation of submitted data may impact funds used to achieve HUD program obligations, or to detect fraud, waste and abuse.
7. There are no special circumstances applicable to this questionnaire.
8. HUD published a Notice of Proposed Information Collection for Public Comment on October 15, 2008, in the Federal Register. The public was given until December 15, 2008, to submit comments on the proposal. HUD received no comments on this proposed collection.
9. No payment or gifts are provided to respondents.
10. No confidential information is being requested. All information requested is part of public record.
11. Respondents are requested to respond to six questions in order for HUD to make a FAR 9.1 responsibility determination.
12. The estimated public burden hours is based on the actual annual number of application received over the past 21/2 years. In order to conduct physical condition inspections of approximately 40,000 multifamily and PHA projects annually, HUD utilizes contract inspectors that are trained in the UPCS protocol and certified by PIH-REAC. This questionnaire provides PIH-REAC with basic knowledge of an inspection candidate's inspection skills and abilities, and a determination is then made as to whether an inspection candidate has the required basic skills and abilities.

Total Burden Hour Estimates						
Type of Burden	Number of Respondents	Annual Frequency of Requirement	X	Est. Avg. Time for Requirement (Hours)	=	Est. Annual Burden (Hours)
On-Line Application	800	1		.25		200
Documentation Copying	800	1		.75		600
Total						800

13. The estimate for the total annual cost burden to respondents is shown, below.

Total Estimated Annual Costs to Respondents						
	Number of Respondents	Total Burden Hours	X	Hourly Rate	=	Annualized Cost
Inspector Assessment Questionnaire	800	800		\$23.07*		\$18,456.00
* Hourly cost for response assuming an Analyst annual salary, GS-11, step 1, annual rate of \$48,148; hourly rate is \$23.07 (Salary Table 2008-GS).						

14. The estimated annualized costs to the federal government, based on a GS-12, step 1, rate is provided in the table, below. A GS-12, step 1, rate is the average salary for an Inspector Administration Analyst.

Total Estimated Annual Costs to the Federal Government						
	Number of Respondents	Total Burden Hours	X	Hourly Rate	=	Annualized Cost
Inspector Assessment Questionnaire	800	800		\$27.65*		\$22,120.00
* Hourly cost for response assuming an Analyst annual salary, GS-12, step 1, annual rate of \$57,709; hourly rate is \$27.65 (Salary Table 2008-GS).						

15. This submission is a program change resulting in a revision of a current information collection. The adjustment reported in item 12 of the OMB 83-I is due to the increase in the number of respondents and reflects the actual annual number of applications received over the past 21/2 years.

16. The information collected will not be published.

17. HUD is not seeking approval to not display the expiration date of the OMB approval. The OMB approval number and expiration date will be displayed on the questionnaire.

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

B. Collections of Information Employing Statistical Methods

Not applicable as this information collection does not employ statistical methods.