

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 Public and Indian Housing Real Estate Assessment Center		2. OMB Control Number: a. b. None 2577-	
3. Type of information collection: (check one) a. <input checked="" type="checkbox"/> New Collection b. <input type="checkbox"/> Revision of a currently approved collection c. <input 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 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)	
7. Title: <u>Training Evaluation Form</u>			
8. Agency form number(s): (if applicable) <u>N/A</u>			
9. Keywords: <u>Training, Public Housing, Housing</u>			
10. Abstract: <u>The Training Evaluation Form will be used by HUD to determine how training provided to public housing agencies and the public can be improved. The completion of the form will be voluntary.</u>			
11. Affected public: (mark primary with "P" and all others that apply with "X") a. Individuals or households e. Farms b. Business or other for-profit f. Federal Government c. P Not-for-profit institutions g. X State, Local or Tribal Government		12. Obligation to respond: (mark primary with "P" and all others that apply with "X") a. P Voluntary b. Required to obtain or retain benefits c. Mandatory	
13. Annual reporting and recordkeeping hour burden: a. Number of respondents 29,288 b. Total annual responses 29,288 Percentage of these responses collected electronically 91% c. Total annual hours requested 966 d. Current OMB inventory 0 e. Difference (+,-) +966 f. Explanation of difference: 1. Program change: 966 2. Adjustment:		14. Annual reporting and recordkeeping cost burden: (in thousands of dollars) Do not include costs based on the hours in item 13. a. Total annualized capital/startup costs 0 b. Total annual costs (O&M) 0 c. Total annualized cost requested 0 d. Current OMB inventory 0 e. Difference 0 f. Explanation of difference: 1. Program change: 2. Adjustment:	
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. P Program evaluation f. Research c. General purpose statistics g. Regulatory or compliance d. Audit		16. Frequency of recordkeeping or reporting: (check all that apply) a. <input type="checkbox"/> Recordkeeping b. <input type="checkbox"/> Third party disclosure c. <input checked="" type="checkbox"/> Reporting: 1. <input checked="" 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 type="checkbox"/> Annually 7. <input type="checkbox"/> Biennially 8. <input checked="" type="checkbox"/> Other (describe) <u>When training is completed</u>	
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: Wanda Funk Phone: 202-475-8736	

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 L. Deitzer, Departmental Reports Management Officer
Office of the Chief Information Officer

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification

1. On September 19, 2005 (70 FR 54983), HUD published a final rule amending the regulation governing the Public Housing Operating Fund Program at 24 CFR part 990 (**Exhibit A**). The regulation was developed through negotiated rulemaking. Part 990 provides a new formula for distributing operating subsidy to public housing agencies (PHAs) and establishes requirements for PHAs to convert to asset management. The goals of asset management are to improve the operational efficiency and effectiveness of managing public housing assets, to better preserve and protect each asset, to facilitate future investment and reinvestment in public housing by public and private sector entities, and to provide an appropriate mechanism for monitoring performance and compliance at the project level.

Subpart H of 24 CFR 990 (§§ 990.255 to 990.290) establishes the requirements regarding asset management. Under § 990.260, PHAs that own and operate 250 or more dwelling rental units must operate using an asset management model consistent with the subpart H regulations. PHAs with fewer than 250 dwelling rental units may elect to transition to asset management, but they are not required to do so. PHAs with 250 or more units are required to implement project-based management, accounting, budgeting and performance evaluation. Title II of Division K of the Consolidated Appropriations Act 2008, P.L. 110-161, (approved December 26, 2007) indicated, for calendar year 2008, that PHAs that own and operate 400 or fewer public housing units may elect to be exempt from any asset management requirement imposed by the Secretary of Housing and Urban Development in connection with the operating fund rule: *Provided*, That an agency seeking a discontinuance of a reduction of subsidy under the operating fund formula shall not be exempt from asset management requirements (**Exhibit B**).

The Consolidated Appropriations Act 2008, P.L. 110-161, also provided “...\$5,940,000 for competitive grants and contracts to third parties for the provision of technical assistance to public housing agencies related to the transition and implementation of asset-based management in public housing.” The contract now in effect will provide for both web-based training, on-site seminars and on-site technical assistance to assist PHAs in implementing asset management (**Exhibit C**).

2. Trainees will be requested to complete the Training Evaluation Form (**Exhibit D**) at the end of each training seminar and technical assistance session. HUD will use the information provided by the trainees in the Training Evaluation Form to determine how the training and technical assistance can be improved to meet PHA needs. Trainees that use the web-based training will be requested to submit the evaluation form via the Internet. Trainees that participate in on-site seminars and technical assistance sessions will be requested to submit a hard copy Training Evaluation form.
3. PHAs will voluntarily complete the form in one of two ways. For web-based training, the form will be completed electronically at the completion of each course. For on-site seminars and technical assistance, the form will be completed manually. A third party contractor will compile the results for review by HUD.
4. The Office of Public and Indian Housing is not aware of any duplication of efforts to collect this information.
5. The information being collected has no significant impact on small businesses or other small entities.
6. If HUD does not implement the Training Evaluation Form, it will not be able to improve the training which will be designed to assist PHAs in the transition to asset management by 2011, when asset management is to be fully implemented.
7. There are no special circumstances that require the collection of information to be inconsistent with the guidelines in 5 CFR § 1320.6.

8. HUD published a Notice of Proposed Information Collection for Public Comments on December 12, 2008 in the Federal Register. The public was given until February 10, 2009 to submit comments on the proposed information collection. HUD received no comments on this proposed collection.
9. No payments or gifts are provided to respondents.
10. Assurances of confidentiality are neither provided nor needed because PHAs will submit this information anonymously.
11. No sensitive questions are being asked.
12. The estimated numbers of respondents is 29,288. This estimate is based on: (1) web-based training – 26,680 (667 PHAs, with an average of two trainees per PHA and 20 courses); (2) seminars – 2,000 (50 seminars with an average of 40 trainees per seminar); and (3) on-site technical assistance – 608 (76 on-site technical assistance visits with an average of 8 PHA employees per visit). The annual burden hours for completing the Training Evaluation Form are estimated to be 2 minutes for each respondent, for a total of 996 hours. This estimation is based on actual experience in completing the Training Evaluation Form.

Total Burden Hour Estimates								
Respondents	Number of Respondents	X	Frequency of Response	Total Responses	X	Estimated Hours	=	Total Annual Burden Hours
PHA Staff	29,288		1	29,288		.033		996
Totals	29,288			29,288				996

The estimated annual cost to respondents are provided in the table, below, and assume an administrative assistant's salary of \$48,148 per year at a GS-11/1 level rate (Salary Table 2008-GS) or an hourly rate of \$23.07.

Estimated Annual Costs to Respondents					
Number of Respondents	Total Burden Hours	X	Hourly Rate	=	Annualized Cost
29,288	996		\$23.07		\$22,297

13. No other costs are associated with the collection of this information.
14. A third party contractor will summarize the results of the completed evaluations per the requirements of the existing contract described in item A1 of this justification. There will be no additional expense to HUD.
15. This is a new collection.
16. This information will not be published.
17. HUD is not seeking approval to not display the expiration date of the OMB approval. The new OMB approval number and expiration date will appear on the Training Evaluation Form.
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

N/A