

EXHIBIT IA. HOUR BURDEN ESTIMATE ASSUMPTIONS

Activities	Hours	Unit of measure
Learning about the requirement, planning, budgeting, etc.:		
Pamphlet:		
Multifamily properties	0.50	hours/property
Single family properties	0.25	hours/group of 10 dwelling units, except for Single Family Mortgage Insurance refinancing.
SF Mtg. Ins. Refinancing	0.08	hours/property
Notices of evaluation and hazard reduction results:		
Multifamily	1.00	hours/property (allocated to evaluation notice only)
Single family	0.25	hours/group of 10 dwelling units, except for SF Mtg. Ins.
SF Mtg. Ins. Refinancing	0.08	hours/property
Preparing the notices:		
Pamphlet (ordering or photocopying):		
Multifamily	0.50	hours/property
Single family	0.25	hours/group of 10 dwelling units, except for SF Mtg. Ins.
SF Mtg. Ins. Refinancing:	0.08	hours/property
Notice of evaluation (writing, photocopying):		
Multifamily	1.00	hours/property
Single family	0.25	hours/group of 10
Notice of hazard reduction, including clearance (writing):		
Multifamily	1.00	hours/property
Single family	0.25	hours/group of 10
Delivery or Posting of notices:		
Multifamily:		
Delivery (25% of units per property):		
Number of notices/unit:	1.00	
Time per unit for delivery:	0.03	hours per unit
Posting (75% of units per property):		
Number of notices/property:		5 or 1
Time per property:		
5 notices/property:	0.50	hrs
1 notice/property:	0.17	hrs
Single family:		
Delivery (100% of units):		
Number of notices/unit:	1.00	
Time per unit for delivery:	0.17	hours/property
Average no. of covered units/multifamily property:		
Multifamily properties with rehabilitation assistance, assistance for acquisition, leasing, operation, and support services, and tenant-based rental assistance:	20	units (1 posted notice)
All other types of assistance:	100	(5 posted notices)
Number of units receiving:		
Pamphlet	0%	100% of units receive pamphlets in accordance with the HUD/EPA Lead Disclosure rule (24 CFR 35, subpart A), which became effective in 1996.
Notice of Evaluation	100%	of units for types of assistance for which risk assessment is required. For other programs, units estimated to receive paint testing, based on cost-benefit study.
Notice of Hazard Reduction		Units receiving clearance, based on cost benefit study.
Assumptions regarding report to health department regarding child with environmental intervention blood lead level (EIBLL):		

Time:

Learning about requirement:		
Multifamily properties:	0.25	hours/property
Single family properties:	0.25	hours/group of 10
Preparing report:	1	hours/case

Percentage of units with child <6:		
Project-based rental assistance:	25%	
HUD-owned multifamily housing:	18%	
Public housing:	35%	
Tenant-based rental assistance:	100%	
Percentage of children with EIBLL:	1.2%	
Percentage of EIBLL cases for which owner receives EIBLL information from source other than public health department:	50%	

Record keeping:		
Labor hours:	0.033	hours/notice or report

Periodic summary reporting		
Labor hours:	0.1	hours/property

EXHIBIT 1B. COST BURDEN ESTIMATE ASSUMPTIONS

Activities	Hours	Unit of measure
Labor rate for startup (learn, prepare):	\$16.00	hour
Labor rate for delivery:	\$11.00	hour
Labor rate for posting, retrieving records:	\$10.00	hour
Cost of materials:		
Pamphlet:	\$0.60	per pamphlet
Notices:	\$0.20	per notice (2 pages/notice @\$0.10/page)
Cost of EIBLL materials and postage:	\$0.61	\$0.19 for paper + \$0.42 postage)
Record keeping:		
Labor cost:	\$0.33	per notice or report (0.033 x \$10.00/hour)
Storage cost - notices:	\$0.07	per notice of evaluation or hazard reduction
Storage cost - reports:	\$1.09	per report of evaluation, clearance or abatement
Periodic summary reporting	\$1.00	per property

EXHIBIT 2: NUMBER OF UNITS, PROPERTIES, AND TYPES OF PAPERWORK REQUIREMENTS, BY TYPE OF HOUSING ASSISTANCE (as of the first year of the extension period)

Type of Assistance and Property	Paperwork Requirement	Units	Properties
HUD-Owned Single Family			
N/A (unoccupied)			
Multifamily Mortgage Insurance			
Pre-1960	Pamphlet	1,875	38
	Notice of evaluation	3,750	38
	Notice of hazard reduction	2,663	27
	Periodic summary reporting	3,750	38
1960-1977	Pamphlet	5,625	113
	Periodic summary reporting	5,625	113
Project-Based Rental Assistance			
Multifamily, >\$5,000/unit	Pamphlet	19,175	346
	Notice of evaluation	38,350	384
	Notice of hazard reduction	12,521	125
	EIBLL requirements	38,350	384
	Periodic summary reporting	38,350	384
Multifamily, <=\$5,000/unit	Pamphlet	204,645	4,093
	Notice of evaluation	113,657	1,137
	Notice of hazard reduction	23,911	239
	EIBLL requirements	409,290	4,093
	Periodic summary reporting	113,657	1,137
Single family	Pamphlet	67,140	12,086
	Notice of evaluation	35,181	3,518
	Notice of hazard reduction	7,231	723
	EIBLL requirements	134,280	13,428
	Periodic summary reporting	35,181	3,518
HUD-Owned Multifamily	Pamphlet	3,750	375
	Notice of evaluation	3,750	375
	Notice of hazard reduction	1,234	123
	EIBLL requirements	3,750	375
	Periodic summary reporting	3,750	375
Rehabilitation Assistance			
<=\$5,000, Single family	Pamphlet	33,418	6,684
	Notice of clearance	66,836	6,684
	Periodic summary reporting	66,836	6,684
<=\$5,000, Multifamily	Pamphlet	3,817	392
	Notice of clearance	7,834	392
	Periodic summary reporting	7,834	392
\$5,001-\$25,000, Single family	Pamphlet	24,499	4,900
	Notice of evaluation	48,998	4,900
	Notice of hazard reduction	25,222	2,522
	Periodic summary reporting	48,998	4,900
\$5,001-\$25,000, Multifamily	Pamphlet	6,439	644
	Notice of evaluation	12,877	644
	Notice of hazard reduction	6,728	336
	Periodic summary reporting	12,877	644
>\$25,000, Single family	Pamphlet	2,909	582
	Notice of evaluation	5,817	582
	Notice of hazard reduction	3,247	325
	Periodic summary reporting	5,817	582

>\$25,000, Multifamily	Pamphlet	3,653	365
	Notice of evaluation	7,306	365
	Notice of hazard reduction	3,817	191
	Periodic summary reporting	7,306	365
Acquisition, Leasing, Operation & Support Services			
Single family	Pamphlet	5,093	509
	Notice of evaluation	1,643	164
	Notice of clearance	355	36
	Periodic summary reporting	1,643	164
Multifamily	Pamphlet	6,103	305
	Notice of evaluation	2,110	106
	Notice of clearance	489	24
	Periodic summary reporting	2,110	106
Public Housing			
Single family	Pamphlet	25,080	4515
	Notice of evaluation	50,160	5,016
	Notice of hazard reduction	23,074	2,307
	EIBLL requirements	5,016	502
	Periodic summary reporting	23,074	2,307
Multifamily	Pamphlet	100,310	1806
	Notice of evaluation	200,620	2,006
	Notice of hazard reduction	92,285	923
	EIBLL requirements	20,062	201
	Periodic summary reporting	200,620	2,006
Tenant-Based Rental Assistance			
Single family	Pamphlet	67,250	13,450
	Notice of evaluation	42,841	4,284
	Notice of clearance	9,290	929
	EIBLL requirements	6,725	1,345
	Periodic summary reporting	42,841	4,284
Multifamily	Pamphlet	103,525	10,353
	Notice of evaluation	65,950	3,298
	Notice of clearance	14,301	715
	EIBLL requirements	207,050	10,353
	Periodic summary reporting	65,950	3,298
Total distinct units		1,280,989	
Total distinct properties			63,637

EXHIBIT 3. [Reserved. Formerly "BURDEN ESTIMATE FOR PROVISION OF PAMPHLET"]

EXHIBIT 4A. HOUR BURDEN ESTIMATE FOR NOTICE OF EVALUATION

Type of Assistance and Property	Activity	Hours/activity	Quantity	Hours
HUD-Owned Single Family	N/A (unoccupied)			
Multifamily Mortgage Insurance	Start-up:	2.00	38.0	76.0
	Delivery:	0.03	937.5	28.1
	Posting:	0.50	38.0	19.0
Project-Based Rental Assistance				
Multifamily, >\$5,000/unit	Start-up:	2.00	384.0	768.0
	Delivery:	0.03	9,587.5	287.6
	Posting:	0.50	384.0	192.0
Multifamily, <=\$5,000/unit	Start-up:	2.00	1,137.0	2,274.0
	Delivery:	0.03	28,414.3	852.4
	Posting:	0.50	1,137.0	568.5
Single family	Start-up:	0.50	3,518.0	1,759.0
	Delivery:	0.17	35,181.0	5,980.8
HUD-Owned Multifamily	Start-up:	2.00	375.0	750.0
	Delivery:	0.03	937.5	28.1
	Posting:	0.50	375.0	187.5
Rehabilitation Assistance				
<=\$5,000, Single family	Start-up:	0.50	6,684.0	3,342.0
	Delivery:	0.17	66,836.0	11,362.1
<=\$5,000, Multifamily	Start-up:	2.00	392.0	784.0
	Delivery:	0.03	1,958.5	58.8
	Posting:	0.17	392.0	66.6
<\$5,001-25,000, Single family	Start-up:	0.50	4,900.0	2,450.0
	Delivery:	0.17	48,998.0	8,329.7
\$5,001-\$25,000, Multifamily	Start-up:	2.00	644.0	1,288.0
	Delivery:	0.03	3,219.3	96.6
	Posting:	0.17	644.0	109.5
>\$25,000, Single family	Start-up:	0.50	582.0	291.0
	Delivery:	0.17	5,817.0	988.9
>\$25,000, Multifamily	Start-up:	2.00	365.0	730.0
	Delivery:	0.03	1,826.5	54.8
	Posting:	0.17	365.0	62.1
Acquisition, Leasing, Operation & Support Services				
Single family	Start-up:	0.50	164.0	82.0
	Delivery:	0.17	1,643.0	279.3
Multifamily	Start-up:	2.00	106.0	212.0
	Delivery:	0.03	527.5	15.8
	Posting:	0.17	106.0	18.0
Public Housing				
Single family	Start-up:	0.50	5,016.0	2,508.0
	Delivery:	0.17	50,160.0	8,527.2
Multifamily	Start-up:	2.00	2,006.0	4,012.0
	Delivery:	0.03	50,155.0	1,504.7
	Posting:	0.50	2,006.0	1,003.0
Tenant-Based Rental Assistance				
Single family	Start-up:	0.50	4,284.0	2,142.0

	Delivery:	0.17	42,841.0	7,283.0
Multifamily	Start-up:	2.00	3,298.0	6,596.0
	Delivery:	0.03	16,487.5	494.6
	Posting:	0.17	3.3	560.7

TOTALS

Start-up:	30,064.0
Delivery:	46,172.0
Posting:	2,786.9

TOTAL HOURS 79,022.9

Total number of evaluation respondents: 37,411

Total number of evaluation notices: 365,527

EXHIBIT 4B. COST BURDEN ESTIMATE FOR NOTICE OF EVALUATION

Cost Category	Activity	Cost/ Hour	Hours	Cost
Labor Cost	Start-up:	\$16.00	30,064.0	\$481,024
	Delivery:	\$11.00	46,172.0	\$507,892
	Posting:	\$10.00	2,786.9	\$27,869
Total Labor Cost				\$1,016,785
Notices		Unit Cost	Number	Cost
Materials Cost		\$0.07	365,527.1	\$25,587
TOTAL COST				\$1,042,372

**EXHIBIT 5A. HOUR BURDEN ESTIMATE FOR NOTICE OF HAZARD REDUCTION
(INCLUDING CLEARANCE)**

Type of Assistance and Property	Activity	Hrs/Activity	Quantity	Hours
HUD-Owned Single Family		N/A		
Multifamily Mortgage Insurance	Start-up:	1.00	27.0	27.0
	Delivery:	0.03	66,508.0	20.0
	Posting:	0.50	27.0	13.5
Project-Based Rental Assistance				
Multifamily, >\$5,000/unit	Start-up:	1.00	125.0	125.0
	Delivery:	0.03	3,130.3	93.9
	Posting:	0.50	125.0	52.5
Multifamily, <=\$5,000/unit	Start-up:	1.00	239.0	239.0
	Delivery:	0.03	5,977.8	179.3
	Posting:	0.50	239.0	119.5
Single family	Start-up:	0.25	723.0	180.8
	Delivery:	0.17	7,231.0	1,229.3
HUD-Owned Multifamily	Start-up:	1.00	123.0	123.0
	Delivery:	0.03	308.5	9.3
	Posting:	0.50	123.0	61.5
Rehabilitation Assistance				
<\$5,000, Single family	Start-up:	0.25	392.0	1,671.0
	Delivery:	0.17	66,836.0	11,362.1
<\$5,000, Multifamily	Start-up:	1.00	392.0	392.0
	Delivery:	0.03	1,958.5	58.8
	Posting:	0.17	392.0	66.6
\$5,000-\$25,000, Single family	Start-up:	0.25	2,522.0	630.5
	Delivery:	0.17	25,222.0	4,287.7
\$5,000-\$25,000, Multifamily	Start-up:	1.00	336.0	336.0
	Delivery:	0.03	1,682.0	50.5
	Posting:	0.17	336.0	57.1
>\$25,000, Single family	Start-up:	0.25	325.0	81.3
	Delivery:	0.17	3,247.0	552.0
>\$25,000, Multifamily	Start-up:	1.00	191.0	191.0
	Delivery:	0.03	954.3	28.6
	Posting:	0.17	191.0	32.5
Acquisition, Leasing, Operation & Support Services				
Single family	Start-up:	0.25	36.0	9.0
	Delivery:	0.17	355.0	60.4
Multifamily	Start-up:	1.00	24.0	24.0
	Delivery:	0.03	122.3	3.7
	Posting:	0.17	24.0	4.1
Public Housing				
Single family	Start-up:	0.25	2,307.0	576.8
	Delivery:	0.17	23,074.0	3,922.6
Multifamily	Start-up:	1.00	923.0	923.0
	Delivery:	0.03	23,071.3	692.1
	Posting:	0.50	923.0	461.5
Tenant-Based Rental Assistance				

Single family	Start-up:	0.25	929.0	232.3
	Delivery:	0.17	9,290.0	1,579.3
Multifamily	Start-up:	1.00	715.0	715.0
	Delivery:	0.03	3,575.3	107.3
	Posting:	0.17	715.0	121.6

TOTALS

Start-up:	4,606.4
Delivery:	24,236.9
Posting:	990.4

TOTAL HOURS 27,416.3

Total number of hazard reduction respondents: 11,052

Total number of hazard reduction notices: 242,543

**EXHIBIT 5B. COST BURDEN ESTIMATE FOR NOTICE OF HAZARD REDUCTION
(INCLUDING CLEARANCE)**

Cost Category	Activity	Cost/Hour	Hours	Cost
Labor Cost	Start-up:	\$16.00	4,606.4	\$73,702
	Delivery:	\$11.00	24,236.9	\$266,606
	Posting:	\$10.00	990.4	\$9,904
Total Labor Cost				\$350,212
Notices		Cost/Notice	Notices	Cost
Materials Cost		\$0.20	242,543	\$48,509
Total Cost				\$398,721

EXHIBIT 6A. HOUR BURDEN ESTIMATE FOR RECORD KEEPING**(applies to notices of evaluation or hazard reduction, and reports of evaluation, clearance or abatement)**

Type of Recordkeeping	Hours per Notice or Report	Number of Notices or Reports	Hours
NOTICE RECORDKEEPING			
Labor Hours	0.033	365,527	12,062.4
REPORT RECORDKEEPING			
Labor Hours	0.033	242,543	8,003.9
TOTAL NOTICES AND REPORTS	0.033	608,070	20,066.3

EXHIBIT 6B. COST BURDEN ESTIMATE FOR RECORD KEEPING**(applies to notices of evaluation or hazard reduction, and reports of evaluation, clearance or abatement)**

Type of Recordkeeping	Cost per Notice or Report	Number of Notices or Reports	Cost
NOTICE RECORDKEEPING			
Labor Cost for Notice Recordkeeping:	\$0.33	365,527	\$120,624
Storage Cost for Notices	\$0.07	365,527	\$25,587
REPORT RECORDKEEPING:			
Labor Cost for Report Recordkeeping	\$0.33	242,543	\$80,039
Storage Cost for Hazard Evaluation/ Reduction / Clearance Reports	\$1.09	242,543	\$264,372
TOTAL NOTICES AND REPORTS COSTS		608,070	\$490,622

EXHIBIT 6C. HOUR BURDEN ESTIMATE FOR PERIODIC SUMMARY REPORTING**(applies to reporting information in summaries of notification, evaluation or hazard reduction reports)**

Type of Recordkeeping	Hours per Summary Report	Number of Reports	Hours
PERIODIC SUMMARY REPORTING			
Labor Hours for summary reporting per quarter	0.10	63,637	6,363.7
Labor Hours for summary reporting per year	0.10	254,548	25,454.8
Labor Hours for recordkeeping of summary reports	0.033	63,637	2,100.0
TOTAL NOTICES AND REPORTS BURDEN			27,554.8

EXHIBIT 6D. COST BURDEN ESTIMATE FOR PERIODIC SUMMARY REPORTING**(applies to reporting information in summaries of notification, evaluation or hazard reduction reports)**

Type of Recordkeeping	Cost per Report	Number of Reports	Cost
PERIODIC SUMMARY REPORTING			
Labor Cost for summary reporting	\$1.10	63,637	\$70,001
Labor Cost for summary reporting per year	\$1.10	254,548	\$280,003
Labor Cost for summary recordkeeping	\$0.33	63,637	\$21,000
Storage Cost for summary reports	\$0.07	63,637	\$4,455
TOTAL NOTICES AND REPORTS COSTS			\$305,458

**EXHIBIT 7A. HOUR BURDEN ESTIMATE FOR REPORTING TO THE PUBLIC HEALTH DEPARTMENT
CASES OF CHILDREN WITH ENVIRONMENTAL INTERVENTION BLOOD LEAD LEVELS (EIBLL)**

I. Number of Cases to be Reported

Formula: (No. of units) x (% of units w/ child <6) x (% of children w/ EIBLL (per CDC))
x (% of EIBLL cases reported by source other than health department)
= number of EIBLL cases that must be reported.

Type of Assistance and Property	No. of units	% of units w/child<6	%of unitsof children <6 w/ EIBLL *	% EIBLL cases reported by source	Number of EIBLL cases that must be reported
Project-Based Rental Assistance					
Multifamily, >\$5,000/unit	38,350	0.25	1.21%	0.5	58
Multifamily, <=\$5,000/unit	409,290	0.25	1.21%	0.5	619
Single family	134,280	0.25	1.21%	0.5	203
HUD-Owned Multifamily	3,750	0.18	1.21%	0.5	4
Public Housing					
Single family	5,016	0.35	1.21%	0.5	11
Multifamily	20,062	0.35	1.21%	0.5	42
Tenant-Based Rental Assistance **					
Single family	6,725	1.00	1.21%	0.5	41
Multifamily	207,050	1.00	1.21%	0.5	1,253
TOTAL CASES					2,231

* Centers for Disease Control and Prevention, Number of Children Tested and Confirmed EBLLs by State, Year, and BLL Group, Children < 72 Months Old (CDC's most recently published data)
www.cdc.gov/nceh/lead/surv/database/State_Confirmed_byYear_1997_to_2006.xls

** For tenant-based rental assisted housing, the Rule covers only units with a child under age 6 years residing or expected to reside.

II. Labor Hours

Formula: Learning about requirement = (no: of properties) x (hours/property)
Preparing and mailing report = (no: of cases) x (no. hour)

Type of Assistance and Property	Activity	Number	hours/ activity	hours
Project-Based Rental Assistance				
Multifamily, >\$5,000/unit	Learning	384	0.25	96.0
	Preparing	58	1.00	57.5
Multifamily, <=\$5,000/unit	Learning	4,093	0.25	1,023.3
	Preparing	619	1.00	613.9
Single family	Learning	13,428	0.25	3,357.0
	Preparing	201	1.00	201.4
HUD-Owned Multifamily	Learning	375	0.25	9.4
	Preparing	4	1.00	4.1
Public Housing				
Single family	Learning	5,016	0.25	1,254.0
	Preparing	11	1.00	105.3
Multifamily	Learning	2,006	0.25	501.5
	Preparing	42	1.00	421.3

Tenant-Based Rental Assistance

Single family	Learning	13,450	0.25	3,362.5
	Preparing	807	1.00	807.0
Multifamily	Learning	10,353	0.25	2,588.3
	Preparing	1,242	1.00	1,242.3
TOTAL CASES	Learning	49,105		
	Preparing	2,985		
TOTAL HOURS				15,644.8

**EXHIBIT 7B. COST BURDEN ESTIMATE FOR REPORTING TO THE PUBLIC HEALTH DEPARTMENT
CASES OF CHILDREN WITH ENVIRONMENTAL INTERVENTION BLOOD LEAD LEVELS (EIBLL)**

Cost Category	Activity	Cost/Hour	Hours	Cost
Labor Cost	Learning	\$16.00	12,192.0	\$195,072.00
	Preparing	\$11.00	3,452.8	\$37,980.80
Total Labor Cost			15,644.8	\$233,052.80
		Cost/EIBLL case	Cases	Cost
Materials Cost		\$0.60	2,984.7	\$1,864.51
TOTAL COST				\$234,917.31

EXHIBIT 8. SUMMARY OF BURDEN ESTIMATES

Requirement	Items	Hours	Total Cost	Labor Cost	Startup Cost	O&M Cost
Notice of Evaluation	365,527	79,023	\$1,042,372	\$535,761	\$481,024	\$25,587
Notice of Reduction	242,543	25,455	\$398,721	\$276,510	\$73,702	\$48,509
Summary Reporting	254,548	27,555	\$305,458	\$280,003	\$0	\$25,455
Recordkeeping	608,070	20,066	\$490,622	\$226,250	\$0	\$264,372
EIBLL Report	3,453	15,645	\$206,334	\$204,469	\$0	\$1,865
Total	1,474,142	167,744	\$2,443,507	\$1,522,993	\$554,726	\$365,788

TOTAL COST: \$2,443,507
TOTAL HOURS 167,744
TOTAL RESPONDENTS 63,637
Hours/Respondent 2.6