

# 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/Sub agency Originating Request: <b>U.S. Department of Housing and Urban Development</b> Office of Housing Assistance & Grant Administration Housing Assistance Policy Division	2. OMB Control Number: a. <b>2502-new</b> b. None
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3. Type of information collection: (check one) a. New Collection b. Revision of a currently approved collection c. Extension of a currently approved collection d. Reinstatement, <b>without change</b> , of previously approved collection for which approval has expired e. Reinstatement, <b>with change</b> , of previously approved collection for which approval has expired f. 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. Regular b. Emergency - Approval requested by c. Delegated 5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities? <b>X</b> Yes    No 6. Requested expiration date: a. Three years from approval date      b. Other (specify)
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**7. Title:**

**Section 8 Contract Renewal Policy – Guidance for the Renewal of Project-Based Section 8 Contracts**

**8. Agency form number(s):** (if applicable)

HUD 9624, HUD 9625, HUD 9626, HUD 9627, HUD 9628, HUD 9628A, HUD 9628B, HUD 9628C, HUD 9628D, HUD 9629, HUD 9630, HUD 9631, HUD 9632, HUD 9633, HUD 9634, HUD 9635, HUD 9636, HUD 9637, HUD 9638, HUD 9639, HUD 9640, HUD 9641, HUD 9642, HUD 9643, HUD 9644, HUD 9645, HUD 9646, HUD 9647, HUD 9648A, HUD 9648B, HUD 9648C, HUD 9648D

**9. Keywords:**

Housing, Multifamily, MAHRA, Section 8 Housing Assistance Payments Program, Contract Rent, Annual Adjustment Factors

**10. Abstract:**

Section 8 renewal collection procedure will notify HUD Section 8 Owners in advance of contract renewal due date, establishes comparable market rents, renew Section 8 contracts and processes, Section 8 funding on an annual basis.

11. Affected public: (mark primary with "P" and all others that apply with "X") a. Individuals or households      e. Farms b. <b>P</b> Business or other for-profit      f. Federal Government c. <b>X</b> Not-for-profit institutions      g. State, Local or Tribal Government	12. Obligation to respond: (mark primary with "P" and all others that apply with "X") a. <b>X</b> Voluntary b. P Required to obtain or retain benefits c. <b>X</b> Mandatory
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13. Annual reporting and recordkeeping hour burden: a. Number of respondents <b>7,077</b> b. Total annual responses      53,722 Percentage of these responses collected electronically      0 c. Total annual hours requested      53,722 d. Current OMB inventory      0 e. Difference (+,-)      0 f. Explanation of difference: 1. Program change: 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      \$0.00 b. Total annual costs (O&M)      \$0.00 c. Total annualized cost requested      \$0.00 d. Total annual cost requested (See Table Below)      \$0 e. Current OMB inventory HUD 9624 and HUD 9625 f. Explanation of difference: 1. Program change: 2. Adjustment:
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15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X") a. Application for benefits      e. <b>XX</b> Program planning or management b. <b>XX</b> Program evaluation      f. Research c. General purpose statistics      g. Regulatory or compliance d. <b>XX</b> Audit	16. Frequency of recordkeeping or reporting: (check all that apply) a. <b>XX</b> Recordkeeping      b. Third party disclosure c. <b>XX</b> Reporting: 1. On occasion      2. Weekly      3. Monthly 4. Quarterly      5. Semi-annually 6. <b>XX</b> Annually 7. Biennially      8.
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17. Statistical methods: Does this information collection employ statistical methods? Yes <b>XX</b> No	18. Agency contact: (person who can best answer questions regarding the content of this submission) Name: Edith Lyons Phone: (202) 402-3935
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## 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 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 Michael E. Winiarski, Deputy Director, Organizational Policy, Planning and Analysis Division, HROA	Date:
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Signature of Senior Officer or Designee:  X Lillian Deitzer, Departmental Reports Management Officer, Office of the Chief Information Officer	Date:
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**Supporting Statements for Paperwork Reduction Act Submission**  
**HUD Housing Assistance Policy Division**  
**OMB 2502-New**

1. Justification:

The Section 8 Renewal Policy Guide implements Section 524 of the Multifamily Housing Reform and Affordability Act of 1997 (MAHRA) (public law 105-65, enacted on October 27, 1997), which governs how expiring Section 8 project-based assistance contracts are renewed. The Section 8 contract renewal process is an essential component to preserving low income rental housing affordability and availability, while reducing long-term costs of project-based assistance. Project-based assistance contracts are renewed under MAHRA to protect tenants and preserve affordable housing for low and very low-income tenants. The Section 8 contract renewal process will provide housing protection for the low and very low-income tenants living in various United States communities. The Section 8 Renewal Policy Guide sets forth six renewal options from which project Owners may choose when renewing their expiring Section 8 contracts.

- Option One (Mark -Up- To-Market)
- Option Two ( Contract Renewals for Other Projects with Current Rents at or Below Comparable Market Rents)
- Option Three (Referral to the Office of Affordable Housing Preservation (OAHP))
- Option Four (Renewal of Projects Exempted from Office of Affordable Housing Preservation (OAHP))
- Option Five (Renewal of Portfolio Reengineering Demonstration or Preservation Projects)
- Option Six (Opt-Outs)

A Rent Comparability Study (RCS) that is submitted at initial renewal will be considered valid for five years. The RCS will be used by HUD for the five-year renewal period. The RCS establishes the market rent for renewals of staged contracts and can be used for the initial renewal of any expiring contract that is not combined and that will expire after the five year life cycle of the RCS. The original RCS should include all of the Section 8 units in the project. The cost of this RCS is an eligible project expense.

At 120 days prior to contract expiration, the Owner must submit the Contract Renewal Request Form (HUD-9624) and additional information as described below selecting from among the following six options, depending upon what the project is eligible for. The Owner must certify that neither they, nor any of their affiliates, are suspended or debarred and that the information in the contract renewal request is true and complete.

Option One (Mark -Up- To-Market)

Owners must also include a RCS (HUD-9628) and a completed Section 8 Units in Contracts Eligible for Mark-Up-To-Market (HUD – 9628D) form for the Section 8 contract(s) eligible for renewal. Based on the RCS and the Section 8 Units in Contracts Eligible for Mark-Up-To-Market (HUD – 9628D), Owners must certify on the worksheet section of the HUD-9624 that the Comparable Market Rent Potential is at or above 100 per cent of the published FMR; that the eligibility criteria are waived; or that the Department should use its discretionary authority to mark rents up to market to facilitate a change in ownership to an eligible unaffiliated nonprofit owner. The Owner must also certify that the property does not have low or moderate-income use restrictions that can be eliminated by unilateral action by the Owner. Under Mark-Up-To-Market, Owners must renew the Section 8 contract for a minimum five-year term, subject to annual appropriations.

Option Two – (Contract Renewals for Other Projects with Current Rents at or Below Comparable Market Rents)

Owners must indicate the term they are requesting e.g., (five years, ten years or twenty years) and that the current contract rent potential of the project is less than or equal to the market rent potential of the comparable market rents. Owners must include a RCS (HUD - 9628), complete the Request to Renew Using Non-Section 8 Units in the Section 8 Project as a Market Rent Ceiling form (HUD-9629) if he/she desires to use such non-Section 8 units in the project as a market ceiling instead of performing a traditional RCS. However, if the Owner requests to renew the Section 8 contract using 75 percent of the FMRs as a market rent ceiling, then no RCS needs to be submitted for an Option Two renewal. The Owner must certify that the project rents do not exceed comparable market rents and that the project has a HUD-insured (or HUD-Held) mortgage.

### Option Three – (Referral to the Office of Affordable Housing Preservation (OAHP))

Project owners of eligible FHA-insured or HUD-held mortgages whose current rent levels exceed market rents must submit, within 120 days of the expiration of their Section 8 renewal contract, a HUD Form 9624 requesting renewal under Option 3. Owners, who make an Option 3 election, must select to renew their contracts under Option 3A, Reduction of Section 8 Rents to Comparable Market Rents without Restructuring (Lite), or an Option 3B, Restructure of the mortgage and reduction of Section 8 rents to Comparable Market Rents (Full). Any Option 3A election must also include a rent comparability study. Owners also certify on the Renewal Worksheet for an Option 3A or Option 3B that the project rents exceed comparable market rents; the project currently has a HUD-insured (or HUD-held) mortgage; neither the owner, or any of their affiliates, are suspended or debarred; and that the information provided is true and correct. Under the Mark-to-Market Program (M2M), owners may be issued an interim M2M HAP Contract at the current above market rents for up to one year while their renewal request is being processed. The project owner sign and date the HUD Form 9624 Cover Sheet and the Renewal Worksheet for the appropriate Option 3 election. A HUD authorized representative must also sign and date the Option 3 Renewal Worksheet to evidence a binding commitment for purposes of Section 579(b) of the Multifamily Assisted Housing Reform and Affordability Act of 1997.

### Option Four – (Renewal of Projects Exempted from Office of Affordable Housing Preservation (OAHP))

Certain projects, referred to as “exception projects” are exempted from debt restructuring through OAHP pursuant to 514(b) of MAHRA because they are not an “eligible multifamily housing project” as defined in 512(2) of MAHRA. Such projects are: 1) Section 202/8 projects currently financed under Section 202 of the Housing Act of 1959; 2) Section 515/8 projects financed under Section 515 of the Housing Act of 1949; 3) SRO Mod Rehab projects; and 4) projects for which the primary financing or mortgage insurance was provided through the state or local government. Since rents may be renewed above market for these projects, the Owner does not have to submit a RCS with its contract renewal package. An Owner of a project that has FHA mortgage insurance or is HUD-held with rents at or below comparable market rents may renew under Option 4 but they must submit a RCS to claim eligibility.

### Option Five - (Renewal of Portfolio Reengineering Demonstration or Preservation Projects)

Owners requesting a renewal of a Portfolio Reengineering Demonstration or Preservation Project must indicate on the HUD-9624 whether or not the project has had either a mortgage restructuring, and/or had the rents reduced to market. If the project is a Preservation Project as defined by the Low Income Housing Preservation and Resident Homeownership Act (LIHPRA) or the Emergency Low Income Housing Preservation Homeownership Act (ELIHPA), the Owner should indicate such on the HUD-9624.

### Option Six - (Opt-Outs)

Section 8(c) (8) of the United States Housing Act requires that Owners give a one-year written notification to tenants and HUD of the contract's termination or expiration. The one-year notification should state the Owner's intentions (i.e. to renew or not renew) at the time of the contract's expiration. On the HUD-9624, the Owner should certify that the required one-year written notification was provided to the tenants living in the project. If the Owner has provided the one-year written notification to the tenants and to the Department, and does not intend to renew the contract, but a full year has not elapsed, the Owner should indicate that he/she agrees to execute a contract renewal for a term that will fulfill the entire one year notification requirement. The Owner must certify that the property does not have any effective Use Agreement, and also agree to honor the tenants' right to remain at the property, provided that the Public Housing Agency (PHA) approves a rent equal to the new rent charged for the unit. Owners must include certain information in a notification letter. In order to meet the legal requirements for the notification, Appendix 11-1 of the Section 8 Renewal Guide provides Owners with a sample one-year notification letter (HUD-9632) for use when an Owner intends to opt-out of the Section 8 project-based contract. Appendix 11-2 is the Department's sample one-year notification letter (HUD-9633) when an Owner intends to renew the Section 8 project-based contract.

### Automatic OCAF Process

The purpose for the Amend Rents Auto OCAF enhancements to the integrated Real Estate Management System (iREMS) is to provide Owners of project-based Section 8 housing that have a multi-year Section 8 contract with automatically calculated annual OCAF rent increases where applicable. iREMS will electronically notify HUD Asset Management in

advance of a property's annual OCAF rent increase due date; which is the Housing Assistance Payments contract anniversary date. The iREMS system will calculate the new OCAF rent increases; the calculated rents will be sent to the Owners for acceptance or denial of the rents. The Amend Rents Auto OCAF-Part A (HUD - 9626), or Amend Rents Auto OCAF-Part B (HUD - 9627), letters and Exhibit A, of the Multifamily Housing Assistance Payments Basic Renewal Contract will reflect the Amend rents for the property. The Amend Rents Auto OCAF-Part A (HUD - 9626), letter will be mailed to the Owner that is not eligible to submit a budget-based rent increase and Amend Rents Auto OCAF-Part B (HUD - 9627), letter will be mailed to the Owner that is eligible to submit a budget-based rent increase. The project Owner must also sign and date the form and return to the HUD/CA office. The new process utilizing the subject forms will streamline rent increase processing by eliminating duplicate processes and significantly reducing paperwork. Costs related to time and materials will be reduced for HUD/CA and the Owner's/Agent's staff members. Owners/Agents will benefit from receiving one of the subject letters. Properties that will benefit from the new process will be properties currently in a multi-term HAP contract that is not in a renewal year.

2. The listed documents are used to establish market rents, amend rents and request renewal of a Section 8 contract under Section 524 of the Multifamily Housing Reform and Affordability Act of 1997 (MAHRA):

**Contract Renewal Request Form (HUD - 9624)** This form is used by the Owner to submit a request for renewal of the project's Section 8 contract. It identifies which option is being requested and contains a worksheet for each option; the one corresponding to the option selected must be completed by the Owner.

**OCAF Rent Adjustment Worksheet (HUD - 9625)** This form must be completed to calculate the amount of the OCAF rent adjustment for projects eligible for this type of rent increase.

**Amend Rents Auto OCAF- Part A (HUD - 9626)** This form will be mailed to the Owner of a project only eligible for an OCAF rent increase.

**Amend Rents Auto OCAF- Part B (HUD - 9627)** This form will be mailed to the Owner of a project eligible for a budget-based rent increase or OCAF rent increase.

**Required Contents for Rent Comparability Study, Appendix 9-10 (HUD - 9628)** This instruction is used by the appraiser to prepare the Rent Comparability Study.

**Rent Comparability Study Grid and Instructions, Appendices 9-2 and 9-8 (HUD – 9628A)** This form is used by the appraiser to document the characteristics of the project and each comparable part of the Rent Comparability Study.

**Appraiser Certification, Appendix 9-1 (HUD - 9628B)** This form is used by the appraiser to certify that his/her work in estimating a market rent for each primary Section 8 unit type is done to the best of his/her knowledge. The appraiser must have collected, updated or verified all data within 90 calendar days before the date of the appraiser's letter, the Certified General Appraiser must be licensed and in good standing in the state where the property is located.

**Rent Comparability (Property Comp Profile Form), Appendix 9-4 (HUD – 9628C)** This form is used by the Owner to demonstrate the estimate "market" rents for rental units in the locate market rent area, which will be concluded by the appraiser in the rent comparability study analysis.

**Section 8 Units in Contracts Eligible for Mark-Up-To-Market (HUD – 9628D)** This form is used by the appraiser to perform the rent calculations.

**Request to Renew Using Non-Section 8 Units in the Section 8 Project as a Market Rent Ceiling, Appendix 9-6 (HUD - 9629)** This form is used by the Owner to request that the HAP contract be renewed under Option 2, using the non-Section 8 units in the project as a market rent ceiling instead of performing a traditional rent comparability study.

**Request to Renew Using Fair Market Rents (FMRs) as a Market Ceiling, Appendix 9-7a (HUD - 9630)** This form is used by the Owner to request that the HAP contract be renewed under Option Two, using 75 percent of Fair Market Rents (FMRs) as a market rent ceiling instead of performing a rent comparability study.

**Certification of Reduction of Rents in Accordance with Mortgage Restructuring, Appendix 5-3 (HUD - 9631)** This form is used by the Owner to certify that the gross rent changes reflect the new rental amount for residents receiving Section 8 Housing Assistance Payments under the Mortgage Restructuring contract.

**One Year Notification Owner Does Not Intend to Renew, Appendix 11-1 (HUD - 9632)** This form is used for Owners who intend to opt-out of the Section 8 contract. Federal law requires that Owners provide tenants with a one-year notification before the expiration of a Section 8 contract.

**One Year Notification Owner Does Intend to Renew, Appendix 11-2 (HUD - 9633)** This form is used for Owners who intend to renew the Section 8 contract. Federal law requires that Owners provide tenants with a one-year notification before the expiration of a Section 8 contract.

**Use Agreement (HUD - 9634)** This form is an agreement entered into when an Owner chooses to Mark-up-to-Market where a for-profit Owner is transferring the property to a non-profit Owner or is doing a budget-based rent increase for capital repairs for a non-profit Owner.

**Projects Preparing a Budget-Based Rent Increase, Attachment 5 (HUD - 9635)** This form is to be used by the Owner to calculate the initial Owner equity in the project when preparing a budget-based rent increase.

**Basic Renewal Contract – One Year Term (HUD - 9636)** This form is the Section 8 contract for a one year term. During the term of the renewal contract, the Contract Administrator shall make housing assistance payments to the Owner in accordance with the provisions of the renewal contract.

**Basic Renewal Contract –Multi - Year Term (HUD - 9637)** This form is the Section 8 contract for a multi - year term. During the term of the renewal contract, the Contract Administrator shall make housing assistance payments to the Owner in accordance with the provisions of the renewal contract.

**Renewal Contract for Mark-Up-To-Market Project (HUD - 9638)** This form is the Section 8 contract to be used when the project rents are being marked-up-to-market. During the term of the renewal contract, the Contract Administrator shall make housing assistance payments to the Owner in accordance with the provisions of the renewal contract.

**Housing Assistance Payments Preservation Renewal Contract (HUD - 9639)** This form is the Section 8 contract for a Preservation project. During the term of the renewal contract, the Contract Administrator shall make housing assistance payments to the Owner in accordance with the provisions of the renewal contract. Such payments provide to the Owner rent benefits comparable to those provided under the Plan of Action in accordance with section 524(e)(1) of the MAHRA.

**Interim (Full) Mark-To-Market Renewal Contract (HUD - 9640)** This form is the Section 8 contract used for a project that is eligible for Mark-to-Market where debt restructuring is necessary. The renewal contract constitutes a binding commitment for purposes of Section 579(b) of MAHRA. During the term of the renewal contract, the Contract Administrator shall make housing assistance payments to the Owner in accordance with the provisions of the renewal contract.

**Interim (Lite) Mark-To-Market Renewal Contract (HUD - 9641)** This form is the Section 8 contract used for a project that is eligible for Mark-to –Market where the project will be viable without debt restructuring. The renewal contract constitutes a binding commitment for purposes of Section 579(b) of MAHRA. During the term of the renewal contract, the Contract Administrator shall make housing assistance payments to the Owner in accordance with the provisions of the renewal contract.

**Full Mark-To-Market Renewal Contract (HUD - 9642)** This form is the Section 8 contract used for a project where the debt has been restructured. During the term of the renewal contract, the Contract Administrator shall make housing assistance payments to the Owner in accordance with the provisions of the renewal contract.

**Watch List Renewal Contract (HUD - 9643)** This form is the Section 8 contract used for a project that initially entered into an interim contract (HUD -9641 or HUD-9642) but later elects not to restructure the debt. During the term of the renewal contract, the Contract Administrator shall make housing assistance payments to the Owner in accordance with the provisions of the renewal contract.

**Project-Based Housing Assistance Payments Contract - Moderate Rehabilitation, Attachment 18 (HUD - 9644)** This form is the Section 8 contract used for a project that initially entered into the HAP contract, in accordance with Section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f), Section 515(a) of the MAHRA, and pursuant to the terms of the Restructuring Commitment. The purpose of the HAP Contract is to provide housing assistance payments on behalf of eligible families who lease and occupy contract units that comply with the HUD PCS. Housing assistance payments shall only be paid to the Owner for contract units occupied by eligible families who lease contract units from the Owner in accordance with statutory requirements, and with all HUD regulations and other HUD requirements. The HAP contract is entered into pursuant to the terms of Restructuring Commitment setting forth the terms of the restructuring for the project involving a Section 8 housing assistance payments contract renewal with debt restructuring.

**Addendum to Agreement to Enter into Housing Assistance Payment Contract (HUD - 9645)** This form is used to add on to a Section 8 Contract when there is a Section 8 budget-based rent increase for capital repairs if there is no FHA Mortgage Insurance.

**Project-Based Section 8 Housing Assistance Payments - Extension of Contract Term (HUD - 9646)** This form is used for a one-time extension of the term of an existing contract for projects that renewed under Option One or Option Two.

**Extension Amendment to Old Regulation State Agency Housing Assistance Payments Contract (HUD - 9647)** This form is used to extend the term of the HAP contract for projects with the 1975 (old regulations) HAP contract to prevent it from expiring when the original financing for the project is prepaid.

**Consent to Assignment of HAP Contract as Security for Freddie MAC Financing (HUD – 9648A)** This form is used when the Owner wants to assign their interest in the HAP contract to the lender, as security for a loan by the lender to the Owner, and that the lender will assign the loan to Freddie Mac. The contract administrator consents to assignment of the HAP contract by the Owner to the lender as security interest in the HAP contract to Freddie Mac. The consent to assignment is not consent for any other or further assignment of the HAP contract (including any interest in the HAP Contract or any payments under the HAP Contract) by the Owner, lender or Freddie Mac, to any other assignee, transferee or successor in interest.

**Consent to Assignment of HAP Contract as Security for Financing (HUD – 9648B)** This form is used when the Owner wants to grant the lender a security interest in the HAP contract, as security for a loan by the lender to the Owner with respect to the project. The contract administrator consents to transfer of the lender's security interest to successor secured parties. The consent of assignment of the HAP contract as security for the loan does not change the terms of the HAP contract.

**Consent to Assignment of HAP Contract as Security for FNMA Financing (HUD – 9648C)** This form is used when the Owner wants to assign their interest in the HAP contract to the lender, as security for a loan by the lender to the Owner, and that the lender will assign the loan to Fannie Mae. The contract administrator consents to assignment of the HAP contract by the Owner to the lender as security interest in the HAP contract to Fannie Mae. The consent to assignment is not consent for any other or further assignment of the HAP contract (including any interest in the HAP Contract or any payments under the HAP Contract) by the Owner, lender or Fannie Mae, to any other assignee, transferee or successor in interest.

**Consent to Assignment of HAP Contract to FNMA as Security for FNMA Credit Enhancement (HUD – 9648D)** This form is used when the Owner wants to grant the Federal National Mortgage Association (FNMA) a security interest in the HAP Contract, as security for the obligations of the owner to FNMA on account of FNMA's credit enhancement of a loan to the Owner.

3. The information is submitted individually by project Owners on an annual and case-by-case basis. HUD has considered the use of improved electronic technology in collecting information; however, there are no funds to upgrade the electronic submission system. Presently the HUD Office's staff enters and updates the Owner's contract information into the HUD integrated Real Estate Management System (iREMS).

4. The collection will be used under the authority of 524 MAHRA requirements; which require some parts of the collection to be submitted by the Owner on an annual basis, (e.g., requests for an annual rent increase) and other parts to be submitted prior to contract expiration which could be annually or at other times if the contract is a multi-year contract.

5. This collection involves small businesses, which are small profit and non-profit organizations.
6. The Section 8 Program requirement requires the collection to be used on an annual basis for rent increases and one year contracts and at other times when the contract is a multi-year contract. The iREMS system is for internal HUD usage; the collection data, rent calculation for OCAF and contract renewal will be extracted from the iREMS system by HUD/Contract Administrator and mailed to the Owner for review and signature.
7. There are no special circumstances relating to this collection.
8. In accordance with 5 CFR 1320.8(d), the Agency's notice soliciting public comments, was announced in the Federal Register on (Volume 73, No. 97, Page 28833). ( No comments were received)

Federal Register/Consultation outside the Agency

The following Code of Federal Regulations:

24 CFR Part 401

24 CFR Part 402

The Agency's notice soliciting both regulations to public for comments.

9. Payment or Gift

No payment or gift was provided to the respondents.

10. Confidentiality

No assurance of confidentiality

11. Questions of Sensitive Nature

No questions of a sensitive nature included in this collection.



12. Estimates of Hours Burden of the Collection of Information (Private)  
Annual Burden Estimate:

Information Collection	Number of Respondents	Total Annual Responses	Burden Hours per Response	Total Annual Burden Hrs	Hourly Cost	Total Annual Cost
1. Contract Renewal Request Form (HUD-9624)	7707	7707	1	7707	\$31.34	\$241,537.38
2. OCAF Rent Adjustment Worksheet (HUD-9625)	6651	6651	1	6651	\$31.34	\$208,442.34
3. Amend Rents Auto OCAF Part A (HUD- 9626)	2397	2397	.25	599.25	\$31.34	\$18,780.50
4. Amend Rents Auto OCAF Part B (HUD- 9627)	7192	7192	.25	1798	\$31.34	\$56,349.32
5. Required Contents for Rent Comparability Study, Appendix 9-10 (HUD - 9628)	1056	1056	50	52800	\$50.00	\$2,640,000.00
6. Rent Comparability Study Grid and Instructions, Appendix 9-2 (HUD-9628A)	1056	1056	1	1056	\$50.00	\$52,800.00
7. Appraiser Certification, Appendix 9-1 (HUD-9628B)	1056	1056	1	1056	\$50.00	\$52,800.00
8. Rent Comparability Study (Property Comp Profile Form), Appendix 9-4 (HUD - 9628C)	1056	1056	1	1056	\$50.00	\$52,800.00
9. Section 8 Units in Contracts Eligible for Mark-Up-To-Market (HUD - 9628D)	1056	1056	1	1056	\$50.00	\$52,800.00
10. Request to Renew Using Non-Section 8 Units in the Section 8 Project as a Market Rent Ceiling - Appendix 9-6 (HUD - 9629)	5	5	.25	1.25	\$31.34	\$39.18
11. Request to Renew Using FMR's as Market Ceiling - Appendix 9-7a (HUD - 9630)	7636	7636	1	7636	\$31.34	\$239,312.24
12. Certification of Reduction of Rents in Accordance with Mortgage Restructuring (HUD - 9631)	100	100	1	100	\$31.34	\$3,134.00
13. One Year Notification Owner Does Not Intend to Renew Appendix 11-1, (HUD - 9632)	51	51	1	51	\$31.34	\$1,598.34
14. One Year Notification Owner Does Intend to Renew, Appendix 11-2, (HUD - 9633)	7636	7636	1	7636	\$31.34	\$239,312.24
15. Use Agreement (HUD-9634)	71	71	1	71	\$31.34	\$2,225.14
16. Project Preparing a Budget Based Rent Increase (HUD - 9635)	748	748	1.5	1122	\$31.34	\$35,163.48
17. Basic Renew Contract - One Year Term (HUD - 9636)	10	10	1	10	\$31.34	\$313.40
18. Basic Renew Contract - Multi - Year Term (HUD - 9637)	7636	7636	1	7636	\$31.34	\$239,312.24
19. Renewal Contract for Mark-Up-To-Market Project (HUD - 9638)	71	71	1	71	\$31.34	\$2,225.14

20. Housing Assistance Payments Preservation Renewal Contract (HUD-9639)	5	5	1	5	\$31.34	\$156.70
21. Interim (Full) Mark-To-Market Renewal Contract (HUD – 9640)	5	5	1	5	\$31.34	\$156.70
22. Interim (Lite) Mark-To-Market Renewal Contract (HUD - 9641)	5	5	1	5	\$31.34	\$156.70
23. Full Mark-To-Market Renewal Contract (HUD - 9642)	5	5	1	5	\$31.34	\$156.70
24. Watch List Renewal Contract (HUD - 9643)	5	5	1	5	\$31.34	\$156.70
25. Project-Based Housing Assistance Payments Contract Moderate Rehabilitation, Attachment 18 (HUD - 9644)	50	50	.50	25	\$31.34	\$783.50
26. Addendum to Agreement to Enter Into Housing Assistance Payment Contract (HUD-9645)	55	55	1	55	\$31.34	\$1,723.70
27. Project Based Section 8 Housing Assistance Payments - Extension of Contract Term (HUD- 9646)	50	50	1	50	\$31.34	\$1,567.00
28. Extension Amendment to Old Regulation State Agency Housing Payment Contract (HUD - 9647)	1	1	1	1	\$31.34	\$31.34
29. Consent to Assignment of HAP Contract as Security for Freddie MAC Financing (HUD - 9648A)	50	50	1	50	\$31.34	\$1,567.00
30. Consent to Assignment of HAP Contract as Security for Financing (HUD - 9648B)	100	100	1	100	\$31.34	\$3,134.00
31. Consent to Assignment of HAP Contract as Security for FNMA Financing (HUD - 9648C)	100	100	1	100	\$31.34	\$3,134.00
32. Consent to Assignment of HAP Contract to FNMA as Security for FNMA Credit Enhancement (HUD – 9648D)	100	100	1	100	\$31.34	\$3,134.00
<b>Totals</b>	<b>53,722</b>	<b>53,722</b>		<b>98,619.50</b>		<b>4,154,802.98</b>

Hourly cost is based on an estimate of the Owner or Owner’s staff to prepare the necessary documents for requesting a Section 8 contract renewal or a rent increase. The Owner/Management Agent cost is reflective of an hourly rate for a federal employee equivalent to a GS-12 grade level. The Attorney and Appraiser cost are based on private entity fees, as reflected in the grid below.

**Estimate of Cost to Respondents:**

The estimated cost is based on the amount of time spent to complete the contract renewal form and estimation of cost to the Owner, which is reflected in the expense to the project: The Owner cost includes the appraiser and an attorney fee; the appraiser will charge for doing the rent comparability study and the attorney will charge for the time it takes to review and synchronize the contract renewal documents. The cost to the Owner will include printing the contract renewal forms.

**Operational Cost Total Time Hourly Rate –Per Form (Cost to Private)**

<b>Position</b>	<b>Frequency Responses</b>	<b>Hour per Responses</b>	<b>Hourly Rate</b>	<b>Annual Hourly Rate</b>
Owner/Mgmt Agents	1	1	\$31.34	\$31.34
Attorney	1	1	\$75.00	\$75.00
Appraiser	1	1	\$50.00	\$50.00
<b>Total Annual</b>				\$156.34

Additional Operation Cost to Private:

Other Cost: Postage \$3.00 x 53,722  
Total Postage \$161,166.00

Printing Cost per each form (\$1.25) \$1.25x 53,722  
Total Printing \$67,152.50

Total Postage and Printing Cost to Private: \$228,318.50

Total Postage \$161,166.00  
Total Printing \$67,152.50  
Total Annual Cost \$4,154,802.98  
Total Postage, Printing and Annual Cost to Private: \$4,383,121.48

13. There are no additional costs to respondents.

14. Annualized Cost to the Federal Government  
Annual Burden Estimate: Annual Burden Estimate:

Information Collection	Number of Respondents	Total Annual Responses	Burden Hours per Response	Total Annual Burden Hrs	Hourly Cost	Total Annual Cost
1. Contract Renewal Request Form (HUD-9624)	7707	7707	1	7707	\$31.34	\$241,537.38
2. OCAF Rent Adjustment Form (HUD-9625)	6651	6651	1	6651	\$31.34	\$208,442.34
3. Amend Rents Auto OCAF Part A (HUD- 9626)	2397	2397	1	2397	\$31.34	\$75,121.98
4. Amend Rents Auto OCAF Part B (HUD- 9627)	7192	7192	1	7192	\$31.34	\$225,397.28
5. Required Contents for Rent Comparability Study, Appendix 9-10 (HUD - 9628)	1056	1056	1	1056	\$37.27	\$39,357.12
6. Rent Comparability Study Grid and Instructions, Appendices 9-2 and 9-8 (HUD-9628A)	1056	1056	1	1056	\$37.27	\$39,357.12
7. Appraiser Certification, Appendix 9-1 (HUD-9628B)	1056	1056	1	1056	\$37.27	\$39,357.12
8. Rent Comparability Study (Property Comp Profile Form), Appendix 9-4 (HUD - 9628C)	1056	1056	1	1056	\$37.27	\$39,357.12
9. Section 8 Units in Contracts Eligible for Mark-Up-To-Market (HUD - 9628D)	1056	1056	1	1056	\$37.27	\$39,357.12
10. Request to Renew Using Non-Section 8 Units in the Section 8 Project as a Market Rent Ceiling - Appendix 9-6 (HUD - 9629)	5	5	1	5	\$31.34	\$156.70
11. Request to Renew Using FMR's as Market Ceiling - Appendix 9-7a (HUD - 9630)	7636	7636	1	7636	\$31.34	\$239,312.24
12. Certification of Reduction of Rents in Accordance with Mortgage Restructuring Appendix 5-3 (HUD - 9631)	100	100	1	100	\$31.34	\$3,134.00
13. One Year Notification Owner Does Not Intend to Renew, Appendix 11-1, (HUD - 9632)	51	51	1	51	\$31.34	\$1,598.34
14. One Year Notification Owner Does Intend to Renew, Appendix 11-2 (HUD - 9633)	7636	7636	1	7636	\$31.34	\$239,312.24
15. Use Agreement (HUD-9634)	71	71	1	71	\$31.34	\$2,225.14
16. Project Preparing a Budget Based Rent Increase (HUD - 9635)	748	748	1	748	\$31.34	\$23,442.32
17. Basic Renewal Contract - One Year Term (HUD - 9636)	10	10	1	10	\$31.34	\$313.40
18. Basic Renew Contract - Multi - Year Term (HUD - 9637)	7636	7636	1	7636	\$31.34	\$239,312.24

19. Renewal Contract for Mark-Up-To-Market Project (HUD - 9638)	71	71	1	71	\$31.34	\$2,225.14
20. Housing Assistance Payments Preservation Renewal Contract (HUD-9639)	5	5	1	5	\$31.34	\$156.70
21. Interim (Full) Mark-To-Market Renewal Contract (HUD - 9640)	5	5	1	5	\$31.34	\$156.70
22. Interim (Lite) Mark-To-Market Renewal Contract (HUD - 9641)	5	5	1	5	\$31.34	\$156.70
23. Full Mark-To-Market Renewal Contract (HUD - 9642)	5	5	1	5	\$31.34	\$156.70
24. Watch List Renewal Contract (HUD - 9643)	5	5	1	5	\$31.34	\$156.70
25. Project- Based Housing Assistance Payments Contract Moderate Rehabilitation, Attachment 18 (HUD - 9644)	50	50	1	50	\$31.34	\$1,567.00
26. Addendum to Agreement to Enter Into Housing Assistance Payments Contract (HUD-9645)	55	55	1	55	\$31.34	\$1,723.70
27. Project Based Section 8 Housing Assistance Payments - Extension of Contract Term (HUD- 9646)	50	50	1	50	\$31.34	\$1,567.00
28. Extension Amendment to Old Regulation State Agency Housing Assistance Payments Contract (HUD - 9647)	1	1	1	1	\$31.34	\$31.34
29. Consent to Assignment of HAP Contract as Security for Freddie MAC Financing (HUD - 9648A)	50	50	.50	25	\$31.34	\$1,567.00
30. Consent to Assignment of HAP Contract as Security for Financing (HUD - 9648B)	100	100	.50	50	\$31.34	\$3,134.00
31. Consent to Assignment of HAP Contract as Security for FNMA Financing (HUD - 9648C)	100	100	.50	50	\$31.34	\$3,134.00
32. Consent to Assignment of HAP Contract to FNMA as Security for FNMA Credit Enhancement (HUD - 9648D)	100	100	.50	50	\$31.34	\$3,134.00
<b>Totals</b>	<b>53,722</b>	<b>53,722</b>		<b>53,547</b>		<b>1,709,473.38</b>

The majority of the work involves reviewing of the Owner's contract submission and/or request for a rent increase and updating the HUD systems with the contract data information. The Performance Based Contract Administrator (PBCA) will complete the reviewing of the contract submission and update the systems; the most recent change to the process that the PBCA has been doing, is to provide the HUD staff the complete submission for approval. The HUD staff will review all data and recommend approval. The HUD staff will process the funding and release funds after approval. PBCA staff vouchers for the funds through a HUD approved process. The Treasury Department issues funds/checks through the direct deposit process. The cost is reflective of the

hourly rates for a federal employee equivalent to a GS-12 and HUD Appraiser also equivalent to a GS-12 grade level.

**Direct Personnel Cost Direct Personnel Cost (Cost to Federal Government)**

	Frequency Responses	Hour per Responses	Hourly Rate	Annual Hourly Rate
Asset Management Staff	1	1	\$31.34	\$31.34
HUD Appraiser	1	2	\$37.27	\$74.54
Clerical Assistant	1	.50	\$15.59	\$7.80
<b>Total Staff Time</b>				Total Cost: \$113.68

Information Collection	Number of Responses	Hours per Response	Total Annual Hours	Hourly Cost	Total Annual Cost
HUD-9624 and Other Documents	48,092	1	48,092	\$31.34	\$1,507,203.28
RCS Documents	5,280	1	5,280	\$37.27	\$196,785.60
Consent to Assignment of HAP Documents	350	.50	175	\$31.34	\$5,484.50
<b>Totals Documents</b>	53,722		53,547		\$1,709,473.38

Operation Cost to Federal Government:

Other Cost: Postage	<u>\$3.00 x 53,722</u>
Total Postage	\$161,166.00
Total Annual Cost	<u>\$1,709,473.38</u>
<u>Total Postage and Annual Cost to the Federal Government:</u>	\$1,870,639.38

Estimated hourly cost is based on the annual salary of a GS-12 (Asset Management Staff) and GS-13 (Appraiser) for reviewing the information.

15. This is a new collection resulting in a program change. The new process utilizing the subject forms will streamline rent increase processing by eliminating duplicate processes and significantly reducing paperwork. Costs related to time and materials will be reduced for HUD/CA and the Owner's/Agent's staff members. Owners/Agents will benefit from receiving one of the subject letters. Properties that will benefit from the new process will be properties currently in a multi-term HAP contract that is not in a renewal year.

16. The results of this collection will not be published.

17. HUD is not requesting approval to avoid displaying the expiration date.

18. No exceptions to the certification statement identified in Item #19 on form OMB 83-I, "Certification for Paperwork Reduction Act Submissions."

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

This information collection does not employ statistical methods.