
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 PHAs 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
Lillian Deitzer

Signature of Senior Officer or Designee:

Date:

X
Wayne Eddins, Departmental Reports Management Officer,
Office of the Chief Information Officer

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification:

1. Why is this information necessary?

On February 17, 2009, the President signed the American Recovery and Investment Act (“the Recovery Act”). Title XII of the Recovery Act involves the funding of Transportation and Housing Urban Development and Related Agencies. The Recovery Act includes \$4 billion of additional Capital Funds to carry out capital and management activities for public housing agencies as authorized under section 9 of the United States Housing Act of 1937 (“the 1937 Act”). The Recovery Act specifies that the Secretary of Housing and Urban Development (“HUD”) shall make available \$3 billion of the funds through the same formula used for amounts made available in FY08. The formula grants are known as “Capital Fund Recovery Grants” (CFRG). The Recovery Act further specifies that \$1 billion will be made available by competition for priority investments, including investments that leverage private sector funding or financing for renovations and energy conservation retrofit investments. These grants are known as “Capital Fund Recovery Competition” (CFRC) grants. Section 1512 of the Recovery Act details the reporting requirements for the recipients of recovery Act funding. Recipients are to report on the obligation and expenditure of Recovery Act funds, the projects on which those funds have been obligated and expended, an evaluation of the completion status of projects and the number of jobs created and jobs retained by the project. This collection details reporting requirements of the Recovery Act for both CFRC and CFRG grants. This information collection is for the reporting requirements only and does not include any of the grant applications information collection.

2. How is this information to be used?

The following types of information are included in this collection:

Electronic Reporting of Recovery Act Capital Fund Grant Status

The information collection covers the information needed from PHAs to determine the status of work items and for HUD to be able to determine whether PHAs are on schedule to obligate and expend funds timely. Per the Recovery Act, PHAs are required to obligate Recovery Act funds within one year and expend Recovery Act funds within three years of the funds becoming available to the PHA.

The Recovery Act reporting will be covered with the following required form:

	Title	Description
	Recovery Act Capital Fund Reporting Electronic Spreadsheet	Electronic spreadsheet which will be filled out by the PHA and submitted to HUD via electronic mail.

3. Describe whether, and to what extent, the collection of information is automated?

The data will be collected utilizing a Microsoft Excel spreadsheet. PHAs will be required to submit the spreadsheet via email. To the greatest extent possible, all PHA data will be pre-populated to minimize data entry. Once the initial file is created, PHAs will be able to update the same file and submit on an ongoing basis.

4. Duplication of Information

This information is not being collected elsewhere. The information being collected is specific to current funding, therefore the information has not been previously collected.

5. Does the collection of information impact small businesses or other small entities?

This collection of information does not significantly impact small businesses or entities.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

The Department would not be able to ensure that funds were distributed in a fair and impartial manner if this collection was not conducted.

7. Explain any special circumstances

There are no special circumstances.

8. Identify the date and page number of the Federal Register notice soliciting comments on the information.

This information collection is being submitted as part of an emergency approval package. A Federal Register notice will be published.

9. Explain any payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts to respondents are provided.

10. Describe any assurance of confidentiality provided to respondents.

The information provided is not of a confidential nature.

11. Justify any questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private.

The information collected does not contain questions of a sensitive nature.

12. Annual Reporting Burden

The annual reporting burden hours for reporting are based on the Recovery Act requirement that each PHA submits a separate report for each project on a quarterly basis. The CFRC grants were awarded with a stipulation of one project per grant. There were 396 CFRC grants awarded and hence there will be 396 reports submitted each quarter. Each of the approximately 3,100 housing authority's in the country received a CFRG grant based on the same formula used for amounts made available in FY08. The CFRG grants were awarded with no stipulations as to how many projects could be undertaken for each grant award. We estimate on average approximately 2 projects will be funded per housing authority. As with the CFRC reports, the CFRG reports will be submitted on a quarterly basis.

Form/Document	No. of Respondents	Average # of Responses	Total Responses	Hours per Response	Total Hours	Cost per hour	Total Cost
CFRC Electronic spreadsheet	396	4	1,584	0.17	270	\$47	\$12,690
CFRG Electronic spreadsheet	3,100	4	12,400	0.34	4,216	\$47	\$198,152
Total Burden			13,984		4,486		\$210,842

13.

Additional Cost to Respondents

There are no additional costs to respondents other than what is reported in Item 12.

14. Annualized cost to the Federal Government

The estimated annualized cost to the Federal Government is based on the hourly rate of \$47, the 2008 General Pay Scale for a GS 14 Step 1, which represents the staff of HUD's Office of Public Housing Investments (OPHI). This office primarily administers the Capital Fund Program, and both administers and implements the Capital Fund Financing Program, and Mixed-Finance transactions for the Capital Fund, Capital Fund Financing, and HOPE VI Programs. OPHI has approximately 40 full-time employees that work on these programs. 40 x \$47 x 2080 hours per year, equals \$3,910,400.

There is no additional cost to the Government related to processing less complex Capital Fund public housing development, since such processing is included as part of standard Field Office staff work.

15. Explain any program changes or adjustments.

Program Change – This is a new collection of information which was made necessary due the Recovery Act, which requires HUD to award \$4 billion of the Recovery Act fund. The information in this collection is required by Section 1512 of the Recovery Act, which requires Recovery Act funding recipients to report on the obligation and expenditure of Recovery Act funds, the projects on which those funds have been obligated and expended, an evaluation of the

completion status of projects and the number of jobs created and jobs retained by the project on a quarterly basis. The information collected from PHAs will be used to determine the status of work items funded with Recovery Act funds and for HUD to be able to determine whether PHAs are on schedule to obligate and expend Recovery Act funds timely. This information collection is the reporting requirements only and does include any of the grant application information.

16. If the information will be published, outline plans for tabulation and publication.

The results of this information collection will not be published.

17. OMB Expiration Date

HUD is not seeking approval to avoid displaying the OMB expiration date.

18. Certification of Paperwork Reduction Act Submission There is no exception to Item # 19 "Certification of Paperwork Reduction Act Submission."

B. Collections of Information Employing Statistical Methods.

The collection of information does not employ statistical methods.