
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. Section 1512 of the Recovery Act outlines the reporting requirements for the use of Recovery Act funds and requires recipients to report quarterly. This collection details reporting requirements of the Recovery Act for HUD Recovery grants. This information collection is for the reporting requirements only and does not include any of the grant applications information collection.

Office of Management and Budget guidance requires that “the use of all funds by recipients is transparent to the public, and the public benefits of these funds are reported clearly, accurately, and in a timely manner”. It is imperative that HUD demonstrate that Recovery Act funding was appropriately spent on HUD identified Core Activities: 1) providing new or rehabilitated housing and 2) improving energy efficiency of HUD stock. This data collection is the first step in clearly and accurately reporting this benefit to the public.

Only HUD Recovery Act Grantees who expend funds on the Core Activities are required to report under this modification. Other programs, such as Homelessness Prevention, do not have to respond. Public Housing Capital Fund, Native American Housing Block Grant, Indian Community Development Block Grant, Community Development Block Grant, Lead and Healthy Homes Programs, Assisted Housing Green Retrofit, and HOME Investment Partnership; all have unit rehabilitation and/or unit construction as one of their Core Activities.

A significant share of HUD’s Recovery Act funds were devoted to energy efficiency or green building programs, including the following: the Public Housing Capital Fund (PHCF) - \$4 billion invested in energy efficient modernization and renovation of our nation's critical public housing inventory, and the Green Retrofit Program for Multi-family Housing (GRP) - \$250 million invested in energy efficient modernization and renovation of housing of privately-owned rental housing receiving project based rental assistance.

We are revising the form “**American Recovery and Reinvestment Act Capital Fund Recovery Competition and Capital Fund Recovery Formula Grants Reporting**” that was approved on “Lillian do you have this date?” to include other HUD program offices receiving Recovery Act funds as well as to incorporate the Core Activities that HUD programs are currently implementing.

2. How is this information to be used?

Office of Management and Budget guidance requires that “the use of all funds by recipients is transparent to the public, and the public benefits of these funds are reported clearly, accurately, and in a timely manner”. It is imperative that HUD demonstrate that Recovery Act funding was appropriately spent on HUD identified Core Activities: 1) providing new or rehabilitated housing and 2) improving energy efficiency of HUD stock.

By collecting this information we will be able to report to Congress and to the Public the total number of housing units rehabilitated and developed by using Recovery Act funds and also provide the energy efficiency measures that was provided when rehabilitating or developing housing units. The energy efficiency information will be analyzed to determine the energy savings that resulted from the adoption of energy efficiency measures when rehabilitating or developing new housing units.

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

The data will be collected utilizing a web-based application. Recipients will be required to complete the form online. To the greatest extent possible, all data will be pre-populated to minimize data entry. Once the initial file is created, recipients will be able to update the same file and submit on an ongoing basis.

Programs, such as such as; HOME Investment Partnership, Community Development Block Grant, Lead Hazard Control and Healthy Homes grant programs, that have an existing system will not be required to report into this new web-based application and should continue reporting using their current system; as this information will also be incorporated into those systems to be transferred into the web-based application mentioned above.

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?

Some of the recipients of Recovery Act funds subject to this data collection may be small entities, such as a small Public Housing Authority. The impact is expected to be minimal.

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

Office of Management and Budget guidance requires that “the use of all funds by recipients is transparent to the public, and the public benefits of these funds are reported clearly, accurately, and in a timely manner”. It is imperative that HUD demonstrate that Recovery Act funding was appropriately spent on HUD identified Core Activities: 1) providing new or rehabilitated housing and 2) improving energy efficiency of HUD stock. The energy savings and greenhouse gas emissions reduced is a key public benefit of the Recovery Act funds. This data collection is the first step in clearly and accurately reporting this benefit to the public.

If the collection effort is not conducted, information will not be available on the number and types of units improved or developed. HUD would not have a way to account for energy efficiency improvements made by Recovery Act spending. Furthermore, HUD would not be able to report on its core measures to Congress or the Public.

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.

A notice of proposed information collection for HUD Recovery Act Programs was published in the Federal Register on **December XX, 2009, page XXXXX** to solicit public comment.

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.

Only summary level data will be made available to the public. Any sensitive information such as individual address of residences that receive Recovery Act funding will not be disclosed. Information at the Grantee level is not sensitive and there is no need for confidentiality.

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

HUD Recovery Act Grantees who are required to report include those that are expending funds on the core activities of new unit development and unit rehabilitation and energy efficiency improvements. Other programs, such as Homelessness Prevention, do not have to respond to this survey.

5500 entities will be surveyed over the internet. Average time to complete the survey is 30 minutes. Respondents will be surveyed four times annual, once every quarter. Each respondent will spend an additional 3.5 hours collecting the data required to accurately complete the survey. Total burden hours are 88,000.

The costs estimated below are based on an estimated labor rate of \$38.53 (GS-13 Step 1 equivalent). Based on the information described in item 12, the costs are:

5500 respondents * 4.0 hours/respondent * 4/year	=	88,000 labor hours annually
88,000 labor hours * \$38.53 per hour	=	\$3,390,640

The total effort is estimated to be 88,000 labor hours (\$3,390,640) for this requirement.

The annual reporting burden hours for reporting are based on the Recovery Act requirement that each recipient submits a separate report for each project. We estimate an average of approximately 2 projects will be funded per recipient. We further estimate that, on average, a response time of 0.25 hours will be required to report on each project with a total of 0.5 hours.

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

Estimated annualized cost for collection of information is \$3,390,640 (88,000 labor hours annually x \$38.53 estimate hourly cost). The estimated hourly cost figure of \$ 38.53 is determined for an experienced professional that approximates the hourly (mid-range) salary of a GS-13 employee. Individual ARRA grantees charge their costs for this data collection as ARRA project management and administration costs. The annualized cost is funded by the Federal government.

15. Explain any program changes or adjustments.

Program Change – This is an expansion of a collection of information which is necessary to accommodate additional programs funded by the Recovery Act and to collect information on HUD core activities that was not initially included. The information in this collection addresses Office of Management and Budget guidance that required that “the use of all funds by recipients is transparent to the public, and the public benefits of these funds are reported clearly, accurately, and in a timely manner”. This data collection is the first step in clearly and accurately reporting these benefits to the public.

The information collected from recipients will be used to determine the status of work items funded with Recovery Act funds and for HUD to be able to determine spending on energy efficiency measures. This information collection is the reporting requirements only and does include any of the grant application information.

The total number of annual hours requested is 88,000. This is clearly more than the estimate in the current OMB inventory of 4,486 annual hours. The deference, 83,512 annual hours, can be attributed to under estimation of the time needed for the respondent to collect the information and input the data. The current OMB inventory figure does not take into account the time necessary for the respondent to collect the information requested by survey. While the respondent should have this information readily available it is assumed that it will take 3.5 hours per respondent to collect and accurately account for the data before input.

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.