

**Supporting Statement for Paperwork Reduction Act Submission
Office of Public and Indian Housing (PIH)
Renewal Request of Form HUD-50058, Form HUD -50058 MTW
Multifamily Tenant Characteristics Family Report
OMB # 2577-0083**

A. Justification:

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

This Paperwork Reduction Act submission describes the proposed renewal of Form HUD-50058 Family Report and Form HUD-50058 Moving to Work (MTW) Family Report, a derivative of the Form HUD-50058.

The Office of Public and Indian Housing of the Department of Housing and Urban Development (HUD) provides funding to Public Housing Agencies (PHAs) to administer assisted housing programs. Form HUD-50058 and Form HUD-50058 MTW Family Reports solicit demographic, family profile, income and housing information on the entire nationwide population of tenants residing in assisted housing. This information allows HUD to monitor and evaluate its programs as required under the following:

- United States Housing Act of 1937(42 U.S.C. 1437 et seq.)
- Quality Housing and Work Responsibility Act of 1998 (Public Law 105-276)
- HUD Appropriations Act 1996 (Public Law 104-134 Section 204)
- “Electronic Transmission of Required Family Data for Public Housing, Indian Housing, and the Section 8 Rental Certificate, Rental Voucher, and Moderate Rehabilitation Programs” (24 CFR Part 908)

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

PHAs collect and submit information collected from Form HUD-50058 and Form HUD-50058 MTW Family Reports to HUD. This information is utilized for the subsequent purposes:

- Analyze assisted housing programs;
- Permit PHAs to monitor their own reporting to identify favorable and unfavorable trends;
- Monitor PHAs and participants for compliance with program regulations and requirements;
- Fraud detection and prevention via rent/income monitoring;
- Housing inventory and development of program initiatives with emphasis on the housing of special needs groups; and
- Make available accurate demographic information depicting tenant characteristics to Congress and other interested parties.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Several vendors offer Housing Agency management software, including creation/submission of 50058s. HUD offers a free software program called Family Reporting Software (FRS) to all PHAs. Data collected via Form HUD-50058 and Form HUD-50058 MTW Family Reports is electronically submitted by the PHAs into the PIH Information Center (PIC) on a monthly basis. PIC is an automated database system which exchanges this data, between Housing Authorities and Local HUD Offices. This data repository is also accessible to HUD Headquarters and field offices.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Form HUD-50058 and Form HUD 50058 MTW Family Reports are the sole mechanisms employed to collect information on tenant characteristics of assisted program housing. This data cannot be obtained by any alternate automated source.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

This information collection has no impact on small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Failure to collect this data at least annually would impede HUD's ability to create effective program policies, measure the impact of these program policies and funding, and provide accurate information to OMB, Congress and the public.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

Although public housing agencies are only required to submit data annually for each participating household, families move into and out of subsidized units throughout the year. Therefore, the agencies complete Form HUD-50058 and Form HUD-50058 MTW Family Reports for individual families at different times during the year. HUD requires all agencies to electronically submit the forms that they have completed to the PIC system at least monthly. The Department received OMB approval on September 6, 2006, to require PHAs with less than 100 units to submit Form HUD-50058 and Form HUD-50058 MTW Family Reports data monthly as opposed to quarterly.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.

A notice was published in the Federal Register, volume 75, page 5621, dated February 3, 2010, announcing the intent to submit the proposed information collection to the Office of Management and Budget and invited comments. No comments were received in response to the Federal Register notice.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift will be granted to the respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

In accordance with the Federal Privacy Act of 1974, 5 U.S.C. 552a, public housing agencies must inform applicants and resident families about possible Federal Government uses of information contained on Form HUD-50058 and Form HUD-50058 MTW Family Reports, and the systems to monitor reductions in subsidy payment errors. Form HUD-9886 *Authorization for the Release of Information/Privacy Act Notice*, is used to inform residents of the authority for the collection of information, the purpose of the data collection, and the uses of the information collected by the PHAs pursuant to the agencies' obligation to submit information to HUD. Tenants give consent for the collection and use of information by signing Form HUD-9886.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Form HUD-50058 and Form HUD-50058 MTW Family Reports do not collect information of a sensitive nature. Private information such as income, social security numbers and public benefits however, are solicited. This information is required for proper administration of the assisted housing programs and for monitoring program performance. Please refer to section ten for steps taken to attain the consent of residents to collect such information.

12. Provide estimates of the hour burden of the collection of information. The statement should:

Summary:

Estimate of the Hour Burden of the Collection of Information	
Number of responses	2,868,004
Frequency of Response	Annually
Annual Hour Burden	1,079,075
Estimated Annual Cost to Respondents	\$18,883,813

It takes approximately 40 minutes for PHA field officers to collect and input new admission data into each Form HUD-50058 and Form HUD-50058 MTW Family Reports record. Only a portion of the data fields are filled out at each time the form is completed. The fields that are filled are dependent upon the action type or reason for the form’s completion. After the initial year of the forms’ use, the action type for the form will be recertification rather than new submission. The time it takes to complete a recertification is approximately half that of a new submission. Pre-entry of key information from the previous year is responsible for this time reduction.

Through consultation with financial experts in HUD-HHQ Office Field Operations, an amount of \$17.50 has been approximated to represent the national average as well as the average of the hourly rate for a clerical data entry as well as quality control on the entries.

Detailed:

Information Collection	Number of Respondents (PHA) (with Responses)	*Average Number of Responses per Respondent (with Responses)	Total Annual Responses	Minutes per Response	Total Hours	Regulatory Reference (24 CFR) *See Attached
Form HUD-50058 New Admission	4,114	87	355,984	40	237,323	908.101
Form HUD-50058 Recertification	4,114	583	2,398,340	20	799,447	908.101
Form HUD-50058 MTW New Admission	25	529	13,236	40	8,824	908.101
Form HUD-50058 Recertification MTW	25	4,018	100,444	20	33,481	908.101

Total Responses: 2,868,004 Total Hours: 1,079,075

**Average Number of Responses per Respondents = Total_Annual_Responses / Number of Respondents*

Estimated annualized hourly cost to respondents (PHA); Form HUD-50058: To report using Form HUD-50058 Family Report, it will cost the average PHA \$1,051 annually to enter and submit all data for New Admission and \$3,483 annually for Recertification.

- Total Cost for all PHAs; Form HUD-50058 Family Report New Admissions=
 - o 237,323 Total Hours X \$17.50/hour = \$4,153,152.50
- Cost per PHA= \$4,153,152.50 Total cost for all PHAs ÷ 3,953 PHAs (with responses) = \$1,051 per PHA annually
- Total Cost for all PHAs; Form HUD -50058 Family Report Recertification =
 - o 799,447 Total Hours X \$17.50/hour= \$13,990,322.50
- Cost per PHA=\$13,990,322.50 Total cost for all PHAs ÷ 4,017 PHAs (with responses) = \$3,483 per PHA annually

Estimated annualized hourly cost to respondents (PHA); Form HUD-50058 MTW: To report using Form HUD-50058 Family Report, it will cost the average PHA \$6,177 annually to enter and submit all data for New Admissions and \$23,437 annually for Recertification.

The annual burden is calculated by determining the following:

- Total Cost for all PHAs; Form HUD-50058 MTW Family Report New Admission =
 - o 8,824 Total Hours X \$17.50/hour= \$154,420
- Cost per PHA = \$154,420 Total cost for all PHAs ÷25 PHAs (with responses) = \$ 6,177 per PHA annually
- Total Cost for all PHAs; Form HUD-50058 MTW Family Report Recertification =
 - o 33,481 Total Hours X \$17.50/hour= \$585,917.5
- Cost per PHA =\$585,917.5 Total cost for all PHAs ÷25 PHAs (with responses) = \$23,437 per PHA annually

13. Provide an estimate for the total annual cost burden to respondents or record-keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

Total annual capital and start up cost burden to PHA:

Estimating annual capital and start up cost burdens to PHAs is difficult to determine. Most respondents (PHAs) utilize automated software for the collection, transmission and storage of Form HUD-50058 and Form HUD-50058 MTW Family Reports. Several vendors provide software services to PHAs however, the software is used for several day-to-day business functions not, exclusively form reporting.

Additionally, HUD provides all PHAs with free Family Reporting Software (FRS). PHAs can use this software to electronically submit Form HUD-50058 and Form HUD-50058 MTW Family Reports data to PIC.

Total operation and maintenance of services components:

Estimating the cost to PHAs for the transmission of the Family Reports is difficult to estimate because of the difference in PHA, size, organization structure and administrative capability. A significant cost factor that can be tracked is the time involved to collect the data, fill out the form and electronically submit the data. This information is provided in section 12.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

Approximated on current, 2009 information, the total annual cost to maintain the PIC system, which includes the Form HUD-50058 and Form HUD-50058 MTW Family Reports module, is \$893,000. The cost to HUD headquarters staff to monitor the system is \$150,000 (5%-6% of contractor cost). HUD estimates that contractors and HUD staff spend 40% of their time on maintenance and monitoring the Form HUD-50058 and Form HUD-50058 MTW Family Reports Module. The annual cost of HUD headquarters staff labor to monitor the module is approximately \$100,000. The annual cost of HUD headquarters staff to maintain the module is \$300,000.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14.

The average annual reporting and record-keeping burden has decreased compared to the current OMB inventory by 1,246,514 due to the significant decrease (approximately 50%) in the *Total Annual Responses* for Form HUD-50058 MTW Family Reports Recertification.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The PIC system captures the information from Form HUD-50058 and Form HUD-50058 MTW Family Reports and creates monthly reports such as the Resident Characteristics Report which is available to the public on the HUD website. It provides demographic and income statistics about tenant families that participate in the Housing Programs.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Not applicable. HUD will display the OMB control number and expiration date on the form.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions."

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methods.