
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), appear 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
- (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.

N/A

Signature of Program Official: X Nicole Faison, Program Advisor – Office of Public Housing & Voucher Programs	Date:
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Signature of Senior Officer or Designee: X Leroy McKinney, Departmental Paperwork Reduction Act Officer, Office of the Chief Information Officer	Date:
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Supporting Statement for Paperwork Reduction Act Submission
Office of Public and Indian Housing (PIH): Enterprise Income Verification (EIV) System
– User Access Authorization Form and Rules of Behavior/User Agreement

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.

In accordance with the Federal Privacy Act (5 USC 552a(c), as amended)), HUD is required to keep an accurate accounting of data disclosed from its systems of records. Specifically, the date, nature, and purpose of each disclosure of record to any person or to another agency; and the name and address of the person or agency to whom the disclosure is made.

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.

As a condition of granting HUD and PHA staff with access to the EIV system, each prospective user of the system must 1) request access to the system; 2) agree to comply with HUD's established rules of behavior; and 3) review and signify their understanding of their responsibilities of protecting data protected under the Federal Privacy Act (5 USC 552a, as amended). As such, the collection of information about the user and the type of system access required by the prospective user is required by HUD to: 1) identify the user; 2) determine if the prospective user in fact requires access to the EIV system and in what capacity; 3) provide the prospective user with information related to the Rules of Behavior for system usage and the user's responsibilities to safeguard data accessed in the system once access is granted; and 4) obtain the signature of the prospective user to certify the user's understanding of the Rules of Behavior and responsibilities associated with his/her use of the EIV system.

HUD will collect the following information from each prospective user (HUD and PHA staff): Public Housing Agency (PHA) code, organization name, address, prospective user's full name, HUD-assigned user ID, position title, telephone number, facsimile number, type of work which involves the use of the EIV system, type of system action requested, requested access roles to be assigned to prospective user, public housing development numbers to be assigned to prospective PHA user, and prospective user's signature and date of request.

The authorizing official (the PHA Executive Director or designee for PHA staff and HUD Director or designee for HUD staff) will determine, based on staff responsibilities and duties, who will need access to the EIV system. Each prospective user will be required to complete the EIV Access Authorization and User Agreement and Rules of Behavior form and submit it to the designated HUD EIV Coordinator. The information will be collected electronically and

manually via a PDF-fillable or Word-fillable document, which can be emailed, faxed or mailed to HUD.

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.

The information will be collected electronically and manually via a PDF-fillable or Word-fillable document, which can be emailed, faxed or mailed to HUD.

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.

There is no similar information collected or available under previous collections of information. As such, there is no duplication.

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.

By collecting this information electronically, the burden of this collection is minimized for all entities, including small entities that administer HUD rental assistance programs.

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.

If this information is not collected, the Department will not be in compliance with the Federal Privacy Act and be subject to civil penalties.

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

*** Requiring respondents to report information to the agency more often than quarterly;**

The respondent would have to provide updated information for Sections A.10, B, C, D or E of the form, if the agency decided to change the level of access the system user would require.

*** Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

None

*** Requiring respondents to submit more than an original and two copies of any document;**

None

*** Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**

None

*** In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**

This collection of information is not in connection with a statistical survey.

*** Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

This collection of information does not require the use of a statistical data classification that has not been reviewed and approved by OMB.

***That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

None

*** Requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

PHAs are not required to submit proprietary trade secrets or other confidential information.

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.

Pending publication in Federal Register. Regardless of public comment, the Federal Privacy Act (5 USC 552a, as amended) requires the collection of this information, since users of the EIV system will be accessing personally identifying information. HUD is required to maintain a record of all individuals who will have access to information protected under the Federal Privacy Act.

Specifically address comments received on cost and hour burden.

Pending publication in Federal Register.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

During the development period of the EIV system, HUD formed a Integrated Project Team (IPT), which consisted of staff of HUD and Public Housing Agencies (PHAs) to obtain feedback on every aspect of system development and information collection requirements to provide PHAs with this system, that they have requested HUD to provide for them. HUD has discussed the requirements under the Federal Privacy Act related to information collection and safeguarding of personally identifying information that is maintain in EIV. The stakeholders have provided feedback to HUD with respect to mechanisms that can be implemented to reduce the administrative burden of information collection and comply with the requirements under the Federal Privacy Act. HUD has implemented the majority of the measures that the stakeholders have requested. Based on the review of the HUD-crafted electronic collection and display of the information to be collected under this PRA request, HUD has received a positive response from the stakeholders.

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

No payment or gift will be provided to respondents.

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

The integrity and availability of data in EIV is important. Much of the data needs to be protected from unanticipated or unintentional modification, as well as improper and authorized use or disclosure. HUD restricts the use of this information to HUD approved officials, program administrators such as PHAs under contract with HUD; thus, the data is protected accordingly.

Vulnerabilities and corresponding security measures include: (1) only persons with Web Access Subsystem (WASS) User IDs and passwords may access EIV; (2) access to EIV is controlled using EIV's security module, which controls a user's access to particular modules based on the user's role and security access level; (3) User IDs are used to identify access to sensitive data by users; (4) data corruption/destruction: PHA users do not have write access to databases that contain income information obtained by HUD from third parties. HUD users' write access is limited to user administration by authorized personnel. This will eliminate the risk of data destruction or corruption. (5) PHA users, as designated by the PHA's Executive Director or designee, will have the ability to enter debt owed and termination information of former program

participants into EIV. Designated users have the ability to update and delete debt owed and termination information as necessary. These designated users will be assigned a specific role in EIV to enable the entering of this data. Those users without the assigned role to enter data into EIV will be able to only view information pertaining to families who owe a debt to a PHA or have been terminated from a PIH program.

With respect to the information that will be collected under this information collection effort, this information may be provided to only the following entities:

1. U.S. Attorney's Office
2. Department of Justice
3. HUD's Office of Inspector General
4. HUD Staff
5. Staff of the Department of Health and Human Services (HHS)
6. Staff of the Social Security Administration (SSA)
7. Third Party Auditors

Such disclosures are permissible under the Federal Privacy Act and included in the provision of the Computer Matching Agreements between HUD and SSA; and HUD and HHS. Data within the EIV system is provided by HHS and SSA. As such, staff of these agencies is authorized to know who is accessing data provided to HUD by them.

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.

HUD does not require the asking of private or sensitive questions of the respondents or third parties.

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

*** Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

*** If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

*** Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

Estimate of the Hour Burden of the Collection of Information	
Number of respondents	17,417
Frequency of Response	Annually (and periodically for updates)
Annual Hour Burden	18,288.00
Estimated Annual Cost to Respondents	\$360,273.60

The annual burden is calculated by determining:

1. The number of actual PIH EIV system users (excluding HUD staff) as of August 4, 2009, is **17,205**.
2. The number of estimated additional PIH EIV system users that will request access to the PIH EIV system in the future, which equals **212**. This number is determined by identifying the number of PHAs that presently do not have access to the system (53) and multiplying this number by an average of 4 users per PHA.
3. The total number of respondents is equal to the sum of users identified in items 1 and 2 above, which equals **17,417**.
4. The estimated number of PIH EIV system users who will need to modify their system access (a) and frequency of such update (b) is as follows:
 - a. 10% of the users (identified in item 3 above) equals **1,742**
 - b. Twice a year (2 times) users will need to modify their responses
 - c. Total number of annual periodic responses is equal to **3,484**
5. The estimated amount of time it takes for the respondent to read and complete the form (including instructions), which equals
 - a. 1.0 hour for initial collections; and
 - b. 0.25 hours for subsequent periodic collection.
6. Initial and subsequent periodic collections:
 - a. Annual hour burden for initial collections by multiplying item 3 above by the rate in item 5a above, which equals **17,417.00**.
 - b. Annual hour burden for subsequent periodic collections by multiplying item 4c above by the rate in item 5b above, which equals **871.00**.
 - c. Total annual hour burden by adding the sum of items 6a and 6b above, which equals **18,288.00**.

The estimated annual cost to respondents is determined by multiplying the annual hour burden by \$19.70 per hour, which is the 2008 median rate of pay for community and social service occupations, according to the Department of Labor's Bureau of Labor Statistics.

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

Notwithstanding HUD's request to collect this information, PHAs already collect and maintain this information. As such, there is no annual cost burden to respondents or recordkeepers resulting from this collection of information.

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.

There is no additional cost to HUD for the collection of this information.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

This is a new collection. This information will be used by HUD to authorize and account for all HUD and PHA staff that will have access to the EIV system.

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 information collected by PHAs will not be published.

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," of OMB Form 83-I.

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methods.