

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification:

1. Why is this information necessary?

On January 25, 2010, the Department of Energy implemented a new rule for its Weatherization Assistance Program (71 CFR 3847). Under the new rule, if a public housing, assisted multi-family or Low Income Housing Tax Credit (LIHTC) building is identified by HUD and included on a list published by DOE, that building meets DOE's weatherization program income requirements without the need for further evaluation or verification, and may meet certain other program requirements.

This information collection will enable HUD to gather additional information from a small number of property owners whose properties were not included on the initial list posted by DOE.

A minimum requirement for inclusion on these lists is that at least 66 percent of the residents of the building (50 percent for 2-4 unit buildings) must meet DOE's income eligibility requirement, which is currently set at 200 percent of the federal poverty level, or, if a state chooses, 60 percent of the state's median income.

The DOE Final Rule requires that each building within a project meet the income qualification requirements in order to be included on the published eligibility list, whereas HUD records for assisted properties are at generally at the property or project level – which may contain more than one building. The initial list of properties provided by HUD to DOE contains properties that HUD was able to verify income eligibility for participation by utilizing existing available information.

The buildings HUD was able to provide to DOE for inclusion on the initial lists were: (1) projects/properties that consist of a single building, where at least 66 percent of the residents meet DOE's income requirements; and (2) projects/properties with more than one building where 100 percent of the project/property's residents meet DOE's income requirements.

A number of property owners have subsequently contacted HUD to request that properties not included on these initial lists be checked as to their eligibility. In order to enable HUD to verify additional buildings within projects/properties that may meet DOE's income guidelines, additional information is needed. Property owners will be requested to email HUD energyaction@hud.gov with a list of projects that the property owner believes should be included on the next published list of eligible buildings. For each property, a certification with the following information will be provided:

- a. Property/Project ID number and address
- b. Number of individual buildings within that project/property
- c. List of addresses for each building, and the number of units in each building
- d. For multiple buildings that share the same address, the apartment or unit addresses.

The reason for the certification is to ensure that the information is accurate. HUD will review the income eligibility for those addresses associated with each building identified in the certification. If, utilizing this information, an individual building within a project/property is income-eligible according to DOE requirements, HUD will provide that information to DOE for posting on DOE's website.

Alternatively, if, with the additional information supplied, HUD is able to determine that all buildings within the project meet DOE's income requirements, the entire project/property will be posted on DOE's web site. The information will be posted as a quarterly addendum to the DOE Lists.

2. How is this information to be used?

By collecting this information HUD will be able to verify additional multifamily public and assisted housing properties as potentially eligible for \$5 billion in Recovery Act funding for DOE's Weatherization Assistance Program. HUD will utilize the information to check its data base to determine whether additional properties can be posted to the DOE list of properties that are "automatically qualified" for DOE weatherization assistance.

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

The data will not be automated.

4. Duplication of Information

This information is not being collected elsewhere. The information being collected is specific to individual owner requests for HUD to check their records as to their eligibility for DOE weatherization funding.

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

Some of the property owners requesting HUD check their properties as to their eligibility for DOE weatherization assistance may be small businesses. 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.

Without the requested certification, it may be possible for property owners to falsify the information provided to HUD as to the building addresses being requested, and they may thereby falsely be certified as eligible for the DOE Weatherization Assistance Program. On a more positive note, HUD's ability to utilize the information to qualify additional properties for the weatherization program may result in more properties being able to take advantage of the program.

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 **May XX, 2010, 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.

None of the information provided will be made available to the public.

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 number of property owners who will utilize this Certification will be extremely small – we estimate approximately 100. The average time that will be taken to complete the form will be 30 minutes. This will be a one-time event. Total burden hours will be 50 hours.

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:

100 respondents * .5 hours/respondent * 1/year	=	50 labor hours annually
50 labor hours * \$38.53 per hour	=	\$1,927

The total effort is estimated to be 50 labor hours (\$1,927) for this requirement.

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 \$1,927. 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. The annualized cost is funded by the Federal government.

15. Explain any program changes or adjustments.

Program Change – This is a new collection of information which is necessary to accommodate HUD’s partnership with the Department of Energy to expand access by multifamily buildings to DOE’s weatherization assistance program. The information collected from recipients will be used to enable more multifamily buildings to potentially access DOE weatherization assistance funded under the Recovery Act.

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.