

Supporting Statement for Paperwork Reduction Act Submission
Section Eight Management Assessment Program (SEMAP) Certification

A. JUSTIFICATION

1. **Reason for collection.** Program regulations at 24 CFR Part 985 sets forth the requirements of the Section Eight Management Assessment Program (SEMAP) that includes a certification of indicators reflecting performance similar to the Public Housing Assessment System (PHAS) for public housing. Through this assessment HUD can improve oversight of the housing choice voucher (HCV) program and target monitoring and assistance to public housing agencies (PHA) that need the most improvement and pose the greatest risk.

Authority: 42 U.S.C. 1437a, 1437c, 1437f, and 3535(d).

2. **Use of information.** On an annual basis (or every two years for small agencies) PHAs are required to submit a SEMAP certification (form HUD-52648) electronically into the Public and Indian Housing Information Center (PIC). There are a maximum of 15 indicators that are either verified through PIC data or an on-site or off-site confirmatory review. HUD uses the PHA's SEMAP certification, together with other available data, to assess PHA management capabilities and deficiencies, and to assign an overall performance rating to each PHA administering a HCV program. HUD rates a PHA on each SEMAP indicator, completes a PHA SEMAP profile identifying any program management deficiencies and assigns an overall performance rating. A PHA's written report of correction of a SEMAP deficiency is used as documentation that the PHA has taken action to address identified program weaknesses. Where HUD assigns an overall performance rating of troubled, the PHA's corrective action plan is used to monitor the PHA's progress on program improvements.
3. **Use of automated collection techniques.** The Department has developed the Public and Indian Housing Information Center (PIC) for electronic submission and scoring of SEMAP certifications via the Internet. Since December 2000 PHAs have been submitting, and HUD field offices have been scoring, SEMAP certifications.
4. **Efforts to identify duplication.** The information collection on the SEMAP certification does not duplicate any currently collected information.
5. **Methods to minimize the burden on small entities.** HUD published its final rule regarding the Deregulation for Small Public Housing Agencies in the Federal Register on June 24, 2003. This rule streamlines HUD's regulatory requirements for small PHAs that administer the public housing and voucher assistance programs under the United States Housing Act of 1937. The final rule deregulated the assessment and scoring of small PHAs under PHAS and SEMAP to a biennial (every two years), rather than annual basis. In accordance with this final rule, the burden is the least necessary to accomplish the Department's purpose.
6. **Consequences if collected less frequently.** Assessing PHA program performance less than annually (or biennially for small PHAs) can result in poor performance going unchecked for longer periods and may result in more ineligible families being assisted, housing quality standards not being sufficiently monitored, or more incorrect subsidies being paid.

7. **Special circumstances.** There are no special circumstances that would cause this information collection to be conducted more than quarterly based on the fiscal year-end date of the PHA or for PHAs to submit their certifications more than annually.
8. A *Federal Register* Notice of Proposed Information Collection was published on October 22, 2009. The public was given a 60-day comment period as required by the Paperwork Reduction Act of 1995; the comment period ended December 21, 2009. No comments were received on this information collection.
9. **Payment to respondents.** No payment or gift is provided to respondents.
10. **Assurance of confidentiality.** There are no assurances of confidentiality provided to respondents.
11. **Questions of a sensitive nature.** There are no questions of a sensitive nature.
12. **Estimated hour burden.** The data below changes from year to year based on the number of PHAs that are required to submit a SEMAP certification. However, the changes in the number of submissions each year (including changes due to small PHAs reporting biennially) is relatively insignificant to warrant changes to the numbers reflected below, which are unchanged from the previous justification statement. From recent PIC data for calendar year 2008, it is estimated that approximately 100 PHAs will be troubled each year and will require a Corrective Action Plan. It is also estimated that approximately 25 percent will not be troubled, but will require a Correction of SEMAP Deficiency for a failed indicator/s.

Information Collection	No. of Respondents	Responses Per Respondent	Total Annual Responses	Hrs per Response	Total Hrs	Regulatory Reference
SEMAP Certification	2,437	1	2,437	12	29,244	985.101
Corrective Action Plan	100	1	100	10	1,000	985.107(c)
Report on Correction of SEMAP Deficiency	609	1	609	2	1,218	985.106
TOTAL ANNUAL BURDEN					31,462	

Estimated annualized cost to respondents. 31,462 total hours x \$20/hr. = \$629,240/
2,437 respondents = \$258 per respondent.

13. **Estimated annual cost.** No additional cost to respondents.
14. **Annualized cost to Federal government.** None.
15. **Reasons for program changes.** There have been no program changes since the last justification submission with the exception of fewer troubled PHAs anticipated and fewer non-troubled PHAs requiring a Correction of SEMAP Deficiency for a failed indicator/s.
16. **Plans for publication of information collected.** The information collection results will

not be published.

17. **Approval to not display expiration date for OMB approval.** HUD is not seeking approval to avoid displaying the OMB expiration date.

18. **Exceptions to certification.** There are no exceptions to the certification statement identified in item 19, OMB 83-i.

B. COLLECTIONS EMPLOYING STATISTICAL METHODS.

The Department's collection of information for SEMAP does not employ statistical methods.