

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification

1. On September 19, 2005 (70 FR 54983), HUD published a final rule amending the regulation governing the Public Housing Operating Fund Program at 24 CFR part 990. The regulation was developed through negotiated rulemaking. Part 990 provides a new formula for distributing operating subsidy to public housing agencies (PHAs) and establishes requirements for PHAs to convert to asset management. The goals of asset management are to improve the operational efficiency and effectiveness of managing public housing assets, to better preserve and protect each asset, to facilitate future investment and reinvestment in public housing by public and private sector entities, and to provide an appropriate mechanism for monitoring performance and compliance at the project level.

Subpart H of 24 CFR 990 (§§ 990.255 to 990.290) establishes the requirements regarding asset management. Under § 990.260, PHAs that own and operate 250 or more dwelling rental units must operate using an asset management model consistent with the subpart H regulations. PHAs with fewer than 250 dwelling rental units may elect to transition to asset management, but they are not required to do so. PHAs with 250 or more units are required to implement project-based management, accounting, budgeting and performance evaluation. Title II of Division K of the Consolidated Appropriations Act 2008, P.L. 110-161, (approved December 26, 2007) indicated, for calendar year 2008, that PHAs that own and operate 400 or fewer public housing units may elect to be exempt from any asset management requirement imposed by the Secretary of Housing and Urban Development in connection with the operating fund rule: *Provided*, That an agency seeking a discontinuance of a reduction of subsidy under the operating fund formula shall not be exempt from asset management requirements.

The Consolidated Appropriations Act 2008, P.L. 110-161, also provided "...\$5,940,000 for competitive grants and contracts to third parties for the provision of technical assistance to public housing agencies related to the transition and implementation of asset-based management in public housing." The contract now in effect will provide for both web-based training, on-site seminars and on-site technical assistance to assist PHAs in implementing asset management.

2. HUD will use the information provided in the Training Evaluation Form to determine how the training and technical assistance can be improved to meet PHA needs.
3. PHAs will voluntarily complete the form in one of two ways. For web-based training, the form will be posted on the web based training website for students to complete and email to HUD at the completion of each course. For on-site seminars and technical assistance, the form will be completed manually at the conclusion of each event. A third party contractor will compile the results for review by HUD.
4. The Office of Public and Indian Housing is not aware of any duplication of efforts to collect this information.
5. The information being collected has no significant impact on small businesses or other small entities.
6. If HUD does not implement the Training Evaluation Form, it will not be able to improve the training which will be designed to assist PHAs in the transition to asset management by 2011, when asset management is to be fully implemented.
7. There are no special circumstances that require the collection of information to be inconsistent with the guidelines in 5 CFR § 1320.6.

Signature of Senior Officer or Designee:

Date:

X
Colette Pollard, Departmental Reports Management Officer
Office of the Chief Information Officer

8. HUD published a Notice of Proposed Information Collection for Public Comments on May 26, 2010, in the Federal Register. The public was given until xxxxxxxx to submit comments on the proposed information collection. HUD received x comments on this proposed collection. **Exhibit E** is the Notice of Proposed Information Collection for Public Comment. **Exhibit F** is the Disclosure Statement.
9. No payments or gifts are provided to respondents.
10. Assurances of confidentiality are neither provided nor needed because PHAs will submit this information anonymously.
11. No sensitive questions are being asked.
12. The estimated numbers of respondents is 29,288. This estimate is based on: (1) web-based training – 26,680 (667 PHAs, with an average of two trainees per PHA and 20 courses); (2) seminars – 2,000 (50 seminars with an average of 40 trainees per seminar); and (3) on-site technical assistance – 608 (76 on-site technical assistance visits with an average of 8 PHA employees per visit). The annual burden hours for completing the Training Evaluation Form are estimated to be 2 minutes for each respondent, for a total of 996 hours. This estimation is based on actual experience in completing the Training Evaluation Form.

Total Burden Hour Estimates								
Respondents	Number of Respondents	X	Frequency of Response	Total Responses	X	Estimated Hours	=	Total Annual Burden Hours
PHA Staff	29,288		1	29,288		.033		966
Totals	29,288			29,288				966

The estimated annual cost to respondents are provided in the table, below, and assume an administrative assistant's salary of \$48,303 per year at a GS-8 Step 2 level rate (Salary Table 2010-GS) or an hourly rate of \$23.22.

Estimated Annual Costs to Respondents					
Number of Respondents	Total Burden Hours	X	Hourly Rate	=	Annualized Cost
29,288	966		\$23.22		\$22,430

13. No other costs are associated with the collection of this information.
14. A third party contractor will summarize the results of the completed evaluations per the requirements of the existing contract described in item A1 of this justification. There will be no additional expense to HUD.
15. This is a new collection.
16. This information will not be published.
17. HUD is not seeking approval to not display the expiration date of the OMB approval. The new OMB approval number and expiration date will appear on the Training Evaluation Form.
18. There are no exceptions to the certification statement identified in item 19 of the OMB 83-I.

B. Collections of Information Employing Statistical Methods

N/A