

# Supporting Statement for Paperwork Reduction Act Submissions

## A. Justification

1. The Family Self-Sufficiency (FSS) Program is authorized under Section 554 of the Cranston-Gonzalez National Affordable Housing Act (P.L. 101-625). The purpose of the FSS program is to develop local strategies to coordinate the use of public housing and Section 8 housing choice voucher rental assistance with support services provided by public and private resources to enable families to achieve economic independence and self-sufficiency.
2. Each Public Housing Agency (PHA) carrying-out a local FSS Program must enter into a Contract of Participation (Form HUD-52650) with each eligible family that opts to participate in the program. The contract enumerates the services of the local FSS Program that are made available to tenants, as well as the responsibilities and obligations of the participating family. The Contract of Participation is required by law (Section 23(c) of the U. S. Housing Act of 1937, as added by Section 554 of the Cranston-Gonzales National Affordable Housing Act, P.L. 101-625).

Each PHA must consult with local officials to develop an Action Plan containing descriptions of the size, characteristics, and needs of the population to be served by its proposed self-sufficiency program; the services and activities it will provide; how the program will be implemented; the public and private resources through which services and activities will be provided; a time-table for implementation; and other data necessary for HUD to ensure coordinated implementation of program services and activities. The Plan will be submitted to HUD as required by law (Section 23 (g) of the U. S. Housing Act of 1937 as added by Section 554 of the Cranston-Gonzalez National Affordable Housing Act, P.L. 101-625).

PHAs must establish an FSS escrow account for each family participating in the program. PHAs will use Form HUD-52652, FSS Escrow Account Credit Worksheet, to determine escrow credit for each participating family. During the term of the Contract of Participation, the PHA credits to the tenant's FSS escrow account a portion of any increase of rent paid that would otherwise result from increases in earned income. This provision is required by law (Section 23(d) of the U. S. Housing Act of 1937, as added by Section 554 of the Cranston-Gonzalez National Affordable Housing Act, P. L. 101-625).

Submittal of annual reports to HUD is required by law (Section 23(1) of the U. S. Housing Act of 1937, as added by Section 554 of the Cranston-Gonzalez National Affordable Housing Act, P. L. 101-625). PHAs fulfill their annual FSS reporting requirements by completion of the FSS addendum to the Form HUD-50058 and through information submitted in narrative form. The burden hours for the reporting through the HUD-50058 are covered under OMB control number 2577-0083.

The application form, HUD-52651, for FSS Program Coordinator funding is necessary to ensure compliance with Section 102 of the Department of Housing and Urban Development Reform Act of 1989 (42 U.S.C. 3545) (HUD Reform Act) and the regulations codified in 24 CFR part 4, subpart A which contain provisions to ensure greater accountability and integrity in provision of assistance administered by HUD. Additional forms used in the application package are the SF-424, OMB approval # 0348-0043; SF-LLL, OMB approval # 0348-0046, and HUD-96011, OMB # 2535-0114.

3. As part of the ongoing implementation of the Electronic Government (E-Government) component of the President's Management Agenda, all application packages for funding of salaries for Housing Choice Voucher Family Self-Sufficiency coordinators are submitted to HUD electronically by PHAs. In addition, information from each family's Escrow Credit Worksheet, HUD-52652, and FSS Contract of Participation, HUD-52650, is submitted to HUD electronically by PHAs using the HUD-50058, Family Report.
4. There is no duplication of effort. Information collected is unique to each participant and does not duplicate any similar information.
5. The information being collected has no significant impact on small businesses or other small entities. The burden associated with such collection of information is the minimum needed for program monitoring.
6. Federal program requirements, policy activities and statutory mandates would not be met if the collection is not conducted, or is conducted less frequently. The information is a one-time collection by the PHA and submitted to HUD for review in accordance with statutory requirements.

7. There are no special circumstances that would cause information collection to be conducted inappropriately.
8. In accordance with 5 CFR 1320.8(d), the agency published a notice of proposed information collection that appeared in the *Federal Register* dated April 14, 2010. Volume is 71, Number 19417. The comment period ended on June 14, 2010. No public comments were received.
9. No payment or gifts to respondents are provided.
10. Assurance of confidentiality is neither provided nor needed.
11. No sensitive questions are being asked.

12. Estimated Annual Reporting and Recordkeeping Burden

Description of Information Collection	Number of Respondents	Responses per Year	Total Annual Responses	Hrs per Response	Total Hours
SF424	750	1	750	0.75	562.5
SF LLL	10	1	10	0.17	1.7
HUD 2880 (2510-0011)	750	1	750	0	0
HUD 96011 (2535-0118)	750	1	750	0	0
HUD-2991 Certification	750	1	750	0	0
HUD-2994-A (2535-0116)	750	1	750	0	0
FSS Application, HUD-52651	750	1	750	0.75	563
Affirmatively Furthering Fair Housing Statement	750	1	750	.5	375
Subtotal (Application)	750	1	750	0	0
Action Plan	5	1	5	40	200
Contract of Participation HUD-52650	750	10	7,500	.25	1,875
Escrow Account Credit Worksheet HUD-52652	750	50	37,500	.85	31,875
Annual Report (Narrative)	750	1	750	1	750
HUD-50058 (2577-0083)	750	50	37,500	0	0
Subtotal (Program Reporting/Recordkeeping)	750	Varies	0	0	0
<b>Total</b>	<b>750</b>	<b>Varies</b>	<b>46,505</b>	<b>44.27</b>	<b>36,202.2</b>

The estimate of the total annual cost burden to respondents/recordkeepers resulting from the collection of this information is: 36,202.2 x \$18 per hour = \$651,639.6.

13. There are no additional costs to the respondents.
14. Estimated annualized cost to the Federal Government for this collection:

	No. of Responses	Hrs. Per Response	Annual Hrs	Cost Per Hr.	Cost to Fed/yr
Action Plan	5	2	10	\$22.00	\$220
Reporting	750	0.5	375	\$22.00	\$8,250
Funding Application	750	0.25	188	\$22.00	\$4,136
<b>Total Cost</b>					<b>\$12,606</b>

15. The burden hours remain the same as when last approved.

16. The information collection results will not be published; the funded grant awards will be published as required by the HUD Reform Act.
17. The expiration date and the OMB approval number will be displayed in the Notice of Funding Availability and on all related forms.
18. There are no exceptions to the certification statement identified in item 19.

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**B. Collections of Information Employing Statistical Methods**

This collection of information does not employ statistical methods.