Supporting Statement for Paperwork Reduction Act Submissions

**Public Housing Agency Plans: OMB Control No. 2577-0226**

**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.**

Section 511 of the Quality Housing and Work Responsibility Act of 1998 (P.L. 105-276, 112 Stat. 2461, enacted

October 21, 1998 (referred to as the “Public Housing Reform Act”) added Section 5A to the U.S. Housing Act of 1937 [42 U.S.C. 1437 *et seq;* see 1437c-1] that created a requirement that all public housing agencies (PHAs) develop public housing agency plans, consisting of a 5-Year Plan and an Annual Plan. The 5-Year Plan describes the mission of the agency and the agency’s long-range goals and objectives for achieving its mission over the subsequent 5 years. The Annual Plan provides details about the agency’s immediate operations, program participants, programs and services, and the agency’s strategy for handling operational concerns, residents’ concerns and needs, programs and services for the upcoming fiscal year.

Subsequent implementation of the PHA Plan, in accordance with Section 5A [42 U.S.C. 1437c-1(k)], allowed for submission of streamlined plans by high-performing PHAs, small PHAs with less than 250 public housing units that are not designated as troubled, or PHAs that only administer tenant-based assistance and do not own or operate public housing.

The previous OMB approval for this collection occurred on November 25, 2008, and reinstated through a change request the *Certification by State and Local Official of PHA Plans Consistency with the Consolidated Plan* (currently form HUD-50077-SL, which accompanies the form HUD-50075 PHA Plan template), which was inadvertently omitted from the prior extension and revision of this collection approved April 21, 2008. The certification had been included and received OMB approvals in previous ICR submissions to extend and/or revise the collection. OMB approved the Civil Rights certification language as part of form HUD-50077, Standard PHA Plan Certifications of Compliance, Item 6: “*The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990”.* This same language will be submitted as a separate certification (form HUD-50077-CR) by Qualified PHAs, as defined by sections 2701 and 2702 of the Small PHA Paperwork Reduction Act, Title VII of the Housing and Economic Recovery Act (HERA) of 2008, which exempts PHAs with 550 or fewer public housing units and vouchers from the requirement to prepare and submit an annual PHA plan. These certification changes will have no significant impact on information collection burden.

Sections 2701 and 2702 of the Small PHA Paperwork Reduction Act, Title VII of the Housing and Economic Recovery Act (HERA) of 2008, (Public Law 110-289, H.R. 3221) enacted July 30, 2008 established new requirements regarding the PHA Plan for certain Qualified PHAs -- defined as those PHAs with less than 550 public housing units and Housing Choice Vouchers combined that are not in “troubled” performance status. As stated in Section 2702, this collection provides Qualified PHAs an exemption from the requirement in Section 5A of the United States Housing Act of 1937, (the Act) to prepare and submit an Annual PHA Plan and supersedes applicable regulations on the PHA Plan, 24 CFR § 903, to the extent those regulations require the preparation and submission of an Annual PHA Plan by **all** PHAs. While no longer required to prepare and submit an Annual Plan, all PHAs are strongly encouraged to post their 5-Year PHA plans and all Annual PHA Plan elements on their website, as applicable. As indicated, a Qualified PHA is defined by HERA as follows:

A public housing agency meeting the following requirements: (1) the sum of public housing dwelling units administered by the agency and the number of vouchers under Section 8(o) of the Act is 550 or fewer and (2) the agency is not designated as troubled under section 6(j) (2) and does not have a failing score under the Section Eight Management Assessment Program (SEMAP) during the prior 12 months.

Based on Section 2702 of HERA Qualified PHAs must meet the following requirements: 1) submit a 5-Year PHA Plan; 2) submit a Civil Rights certification; 3) annually conduct a public hearing to discuss any changes to the goals, objectives, and policies of the agency and invite public comment regarding such changes; 4) not later than 45 days before the date of the hearing, make all information relevant to the hearing and any determinations of the agency regarding those changes available for review and inspection at the PHA’s principal office during normal business hours, and publish a notice informing the public that the information is available and a public hearing will be conducted; and 5) establish 1 or more resident advisory boards (RAB) and consult with and consider the recommendations of the RABs for the agency, at the annual public hearing regarding any changes to the goals, objectives, and policies of that agency.

1. **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 from the current collection.**

The PHA Plan ensures that the public housing agency (PHA) is accountable to the local community for choices it makes relative to the housing needs of low-income, very low income, and extremely low-income families. The information is collected from local, regional, or State public housing agencies who receive funds to operate Federal public housing or Section 8 tenant based-assistance (voucher) programs and transmitted to HUD via the Internet for the purpose of providing a comprehensive source document by which the Department, public housing residents, participants in the tenant-based assistance program, and other members of the public, can monitor the basic PHA policies, rules and requirements concerning the PHA’s operations, programs and services. (24 CFR 903.3).

1. **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 collection requirements covered by this submission require Non-Qualified and Qualified PHAs to download the consolidated 5-Year and Annual Plan template form HUD-50075, and related forms from HUD’s PHA Plan website, fill out the information (5-Year Plan only for Qualified PHAs), attach additional information and certification forms as required, and transmit the documents by mail or electronically with scanned signatures, but electronic submission is encouraged to their local HUD Field Office for review/approval. HUD manually converts a submitted PHA Plan into a uniform readable format and posts it to an internal HUD website so appropriate field offices can review the PHA Plan for compliance. Approved PHA Plans are posted on the HUD website. HUD is moving toward implementation of an internet-based system, where agencies can log on-line and respond to PHA Plan questions directly without first downloading the template.

Future plans are to bring the PHA Plans utility in-house by the end of FY12. The same submittal process will be maintained by federal FTE. The earlier plans to make this PHA Plans an online system integrated within IMS (PIC) have been stalled due to IMS re-scoping and lack of funding.  Also, SAGIS is now inactive which eliminates the other scenario.

1. **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.**

The information collected in a 5-Year and Annual PHA Plan is not collected elsewhere. The 5-Year PHA Plan is a narrative of a PHA’s mission, goals, and objectives for serving the needs of low, very-low, and extremely-low income families and needs of child and adult victims of domestic violence as required by the Violence Against Women Act (VAWA). Annual PHA Plans include an inventory of the PHA’s policies and programs set forth in an abbreviated, but comprehensive format.

1. **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.**

Public and Indian Housing programs typically define small PHAs as those with less than 250 public housing units or Housing Choice Vouchers. Section 3 [42 U.S.C. 1437a] defines a PHA to mean any State, county, municipality, or other governmental entity or public body (or agency or instrumentality thereof) which is authorized to engage in or assist in the development or operation of public housing. Sections 2701 and 2702 of the Small PHA Paperwork Reduction Act, Title VII of the Housing and Economic Recovery Act (HERA) of 2008, (Public Law 110-289, H.R. 3221) provides Qualified PHAs an exemption from the requirement in Section 5A of the United States Housing Act of 1937, (the Act) to prepare and submit an Annual PHA Plan, including related statements of capital improvements and supersedes the existing regulations on the PHA Plan, 24 CFR § 903, to the extent those regulations require the submission of an Annual PHA Plan by **all** PHAs. A Qualified PHA is defined by HERA as follows:

A public housing agency meeting the following requirements: (1) the sum of public housing dwelling units administered by the agency and the number of vouchers under Section 8(o) of the Act is 550 or fewer and (2) the agency is not designated as troubled under section 6(j) (2) and does not have a failing score under the Section Eight Management Assessment Program (SEMAP) during the prior 12 months.

With the passage of HERA and the Small PHA Paperwork Reduction Act, for purposes of PHA Plans, the universe of “small” PHAs is expanded to those that manage 550 or fewer such units. This collection significantly reduces administrative and paperwork burdens and associated costs for Qualified PHAs which represent approximately 68% of the PHAs that administer public housing programs. The currently proposed and revised form HUD-50075 will be used by all PHAs, including Qualified PHAs who will only complete the 5-Year PHA Plan information in sections 1.0-5.3 and 7.2, and submit the template every 5 years. Section 2702 of HERA exempts Qualified PHAs from the preparation and filing requirements for the PHA Annual Plan, requiring only the submission of the 5-Year PHA Plan once every five years, unless there are any interim changes to the goals, objectives, and policies of the PHA. Qualified PHAs submit only the 5-Year PHA Plan, and Civil Rights certification, establish 1 or more Resident Advisory Boards (RAB) and consider their comments and recommendations, and conduct an annual public hearing to discuss changes to the goals, objectives, and policies of the agency, even if the PHA does not propose any changes.

Consequently, Non-Qualified PHAs will prepare and submit an Annual PHA Plan annually, including related statements of capital improvements. Non-Qualified PHA is defined as an agency with a combined total of 550 or more public housing and housing choice voucher units that is designated “troubled” under the Public Housing Assessment System (PHAS) or designated “troubled” under the Section 8 Management Assessment Program (SEMAP) during the prior 12 months.

1. **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.**

Collection of this information is mandated by statute. The majority of the information collected represents an abbreviated and comprehensive inventory of the policies PHAs employ in their management of public housing and Housing Choice Vouchers that are a routine part of the PHAs day-to-day operations.

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

* **requiring respondents to report information to HUD more than quarterly;**
* **requiring respondents to prepare a written response to a collection of information fewer than 30 days after receipt of it;**
* **requiring respondents to submit more than an original and two copies of any documents; or**
* **requiring respondents to retain records for more than three (3) years.**

There are no special circumstances related to this information collection. The currently proposed form HUD-50075 will be used by all PHAs – Qualified, high performing, standard, Non-Qualified, and troubled. Qualified PHAs will only be required to complete the PHA Information (sections 1.0 through 4.0); 5-Year PHA Plan information (sections 5.0 through 5.3 - the mission, goals and objectives of the PHA and the goals, objectives, policies, or programs for servicing victims of domestic violence, dating violence, sexual assault, or stalking) and submit the template every 5 years; and when there are any interim changes that substantially deviate from or significantly amend/modify the current 5-Year PHA Plan of record (section 5.4), including the Civil Rights (form HUD-50077-CR) and Consistency with Consolidated Plan certifications (form HUD-50077-SL). The information collection relates to the day-to-day operation of the PHA. All elements of the PHA plan that are deemed information collections are maintained by the PHA.

1. **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. 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.**

The Department published in the *Federal Register*, Vol. 75, No. 101, page 29570 on May 26, 2010, a Notice of Proposed Information Collection that provided a 60-day public comment period and described the reduced burden for Qualified PHAs with 550 or fewer public housing units and/or Housing Choice Vouchers combined no longer required to prepare and submit an Annual PHA Plan and other revisions to this collection.

In response to the 60-day Notice of Proposed Information Collection, HUD received submissions from 1 commenter.

1. **Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payment or gifts to respondents is involved.

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

The PHA plans submitted to HUD are public information and do not lend themselves to confidentiality.

1. **Provide additional justification for any questions of a sensitive nature, such as 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.**

The PHA plans are not of a sensitive nature.

1. **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.**

**The estimated burden, based on the number of respondents, frequency of response, and annual burden is summarized in the following table:**

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Form HUD-50075** | **QUALIFIED PHAs - Respondents (5-Year Plan)** | **Frequency** | **Estimated Hours - 5-Year Plan** | **TOTAL 5-Year Plan Burden Hours** | **NON QUALIFIED Respondents (Annual Plan)** | **Frequency** | **Estimated Hours - Annual Plan** | **TOTAL Annual Plan Burden Hours** | **Total Responses** |
| **Section 1.0**  **PHA Information** | **2802** | **1** | **0.02** | **56.04** | **1312** | **1** | **0.02** | **26.24** | **4114** |
| **Section 2.0**  **Inventory** | **2802** | **1** | **0.02** | **56.04** | **1312** | **1** | **0.02** | **26.24** | **4114** |
| **Section 3.0**  **Submission Type** | **2802** | **1** | **0.02** | **56.04** | **1312** | **1** | **0.02** | **26.24** | **4114** |
| **Section 4.0**  **PHA Consortia** | **50** | **1** | **0.03** | **1.5** | **20** | **1** | **0.03** | **0.6** | **70** |
| **Sections 5.0 through 5.3**  **Mission, Goals and Objectives, and Violence Against Women Act** | **4114** | **1** | **3.5** | **14399** |  |  |  | **0** | **4114** |
| **Sections 6.0 through 6.1 Annual Plan and Deconcentration Policy** |  |  |  | **0** | **317** | **1** | **0.1** | **31.7** | **317** |
| **Sections 6.2**  **Hope VI, Mixed Finance Modernization or Development, Demolition/Disposition, Conversion of Public Housing, Homeownership Programs, and Project-Based Vouchers** |  |  |  | **0** | **400** | **1** | **2** | **800** | **400** |
| **Section 6.3**  **Capital Improvements** |  |  |  | **0** |  |  |  | **0** | **0** |
| **Sections 6.4**  **CFP Annual Statement and Performance and Evaluation Report, form HUD-50075.1** |  |  |  | **0** | **790** | **1** | **8** | **6320** | **790** |
| **Section 6.5**  **CFP Five Year Action Plan, form HUD-50075.2** |  |  |  | **0** | **790** | **1** | **3** | **2370** | **790** |
| **Section 6.6**  **Capital Fund Financing Program** |  |  |  | **0** | **75** | **1** | **0** | **0** | **75** |
| **Sections 6.7 through 6.8 Housing Needs** |  |  |  | **0** | **1312** | **1** | **2.6** | **3411.2** | **1312** |
| **Section 6.9**  **Additional Information a) Progress in Meeting Mission and Goals;**  **b) Significant Amendments / Modifications or Substantial Deviation; c) Memorandum of Agreement** |  |  |  | **0** | **1263** | **1** | **3.5** | **4420.5** | **1263** |
| **Sections 7.0 through 7.1 Required Submissions for Non-Qualified PHAs including challenged elements, and Resident Advisory Board (RAB) comments** |  |  |  | **0** | **1312** | **1** | **1.2** | **1574.4** | **1312** |
| **Section 7.2**  **Required submission for Qualified PHAs including Resident Advisory Board (RAB) comments and PHA responses and challenged elements** | **2802** | **1** | **0.5** | **1401** |  |  | **0** | **0** | **2802** |
| **Annual Plan**  **Burden Hours** |  |  |  |  |  |  | **20.49** | **19007.12** |  |
| **5-Year Plan**  **Burden Hours** |  |  | **4.09** | **15969.62** |  |  |  |  |  |

Total Burden Hours this collection: 111,005 (Annual Plan burden hours \*5/yrs. + 5-Year Plan burden hours)

Average Annual burden hours for all PHAs: 22,201 (Total burden hours/5 years)

Average Annual Burden Hours per PHA: 5.4 (Average burden hours for all PHAs/4,114 PHAs)

Burden hour estimates are based on a total of 4,114 PHAs - (**2,802** Qualified PHAs and **1,312** Non-Qualified PHAs)

(**639** combined Public Housing and HCV PHAs, **1,514** Public Housing only PHAs and **649** HCV only PHAs) This data was extracted from HUD PIC Data Page on 8-26-2009. The 5-Year Plan is completed once every 5 years by all PHAs (4,114) – 2,802 Qualified and 1,312 Non-Qualified PHAs.

The burden hours reflected in the Burden Worksheet and Supporting Statement represent the average number of hours (15,969.62) for Qualified PHAs to prepare and submit 5-Year PHA Plans and related certifications and documents only, and (19,007.1 hours) for Non-Qualified PHAs to complete the Annual and 5-Year PHA Plan template, CFP forms, and additional certifications and documents as attachments to the PHA Plan based on such factors as the size and designation of the PHA, and number of programs administered by the PHA.

Qualified PHAs (2802) submit the 5-Year PHA Plan once every 5 years.  The Non-Qualified PHAs (1312 - high performers, standard, small, troubled, and Section 8 only) submit annually, the Annual PHA Plan and the 5-Year Plan, every 5 years.

In order to calculate the Average Annual Burden for All PHA Types (Qualified and Non-qualified):

* First, calculate the Total burden hours for All PHA types
  + Annual PHA Plan burden (19,007.12 from worksheet) x 5 years + 5-Year PHA Plan burden (15,969.62 from worksheet) = 111,005.22.
* Then, take the Total burden hours for all PHA types and divide by 5 years (111,005.22/ 5) = 22,201.

1. **Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.**

There is no additional cost to respondents or recordkeeping for collection of this information for the elements: (a) total capital and start-up cost; and (b) total operation and maintenance and purchase of services. Respondents’ costs were covered under the OMB approval for the standard PHA Plan at the time it was originally implemented in 1998. No proposed costs are associated with submission of a further streamlined PHA 5-Year/Annual Plan submission.

1. **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 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.**

The cost to the Federal Government is for a contract of approximately $225,000 for 2,340 hours to manually convert submitted Plans into a uniform readable format, post them to the internal HUD website for HUD field office review, and then post approved Plans on the HUD website for public knowledge. Since the inception of HERA, the PHA Plan submittals have been reduced to approximately 50%, even during peak submission periods. Based upon this reduction, the level of effort to process these plans also reduces to 50%, in manpower and cost from the prior year contract value ($450,000). HUD nonetheless, is proceeding with plans to migrate the PHA Plans process as a fully automated Internet based system via PIH’s IMS or SAGIS systems. The proposed date and system is still undetermined due to Departmental priorities of other planned integrated systems.

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

The current PHA Plan template approved in 2008 applies to all PHAs regardless of size or performance status. This proposed revision to the 5-Year and Annual Plan template significantly reduces the burden for Qualified PHAs with 550 or fewer public housing units and/or Housing Choice Vouchers, by eliminating the requirement to prepare and submit an Annual PHA Plan. In the previous revision to this information collection, which is currently approved, it was stated that the format of the PHA Plan template submitted to HUD did not eliminate any information on programs and policies that PHAs are required by statute or regulation to maintain. PHAs were still required to make all required 5-Year and Annual PHA Plan elements available to the public consistent with both the statute and the regulations. With the implementation of HERA and this proposed revision to the collection. Qualified PHAs no longer have to update Annual PHA Plan elements or make them available to the public. HERA states that with its passage, any law that makes reference to the requirement for a PHA to prepare or submit an Annual PHA Plan does not refer to Qualified PHAs. The submission for the Capital Fund Program is changed for Qualified PHAs, who no longer have to submit the CFP-related forms with an Annual PHA Plan, since they no longer have to prepare or submit an Annual PHA Plan. For Non-Qualified PHAs the CFP information requirements remain unchanged. PHAs will continue to use form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report,* for the following purposes: 1) to submit the initial budget for a new grant; 2) to report progress on any open grant previously funded; and 3) to record a budget revision on previously approved open grants. The form HUD-50075.2, *Five-Year Action Plan,* must be completed at least once every five years for all proposed work. Qualified PHAs are not required to submit forms HUD-50075.1 or HUD-50075.2 with an Annual PHA Plan, but may be required to submit this information under a separate Capital Fund Program process.

With this revision to the PHA Plan information collection HUD seeks to consolidate the PHA Plan requirements for both Qualified PHAs as a result of HERA and for Non-Qualified PHAs, including the Civil Rights and Consistency with Consolidated Plan certifications and VAWA requirements for both groups of agencies. Accordingly, with this information collection request, HUD is revising the previously OMB approved form HUD-50075 to reflect the reduced burden to Qualified PHAs by removing them from respondents required to prepare and submit Annual PHA Plans, and add the Civil Rights certification formerly appearing on form HUD-50077-CR as a separate document for Qualified PHAs. The form HUD-50075 is revised to 1) include a category for Qualified PHAs, “Non-Qualified PHAs” and “Troubled PHAs” as a new line item under PHA Information; 2) add a new section to describe activities for implementing the Violence Against Women Act; 3) add a new requirement to update PHA Plans if PHAs opt to implement non-smoking policies in public housing under the Annual Plan component for Management and Operations; 4) incorporate a table identifying all Annual PHA Plan elements; 5) a new section for the Annual Plan component for Deconcentration in Admissions Policy; 6) add a new requirement under the Annual Plan component for providing Additional Information to HUD referencing any performance improvement plan or Memorandum of Agreement between HUD and Troubled or Standard performance PHAs; 7) modify the list of Required Documents to add forms HUD-50077-CR and HUD-50077-SL and Admissions policies for deconcentration of lower-income families; 8) identify the required submission documents for Qualified PHAs separately; 9) include minor edits to the Instructions page of form HUD-50075; 10) and renumber other sections of the form. Form HUD 50077-CR remains unchanged except deletes from paragraph 1, line 2, “if there is no board of commissioner”. Form HUD-50077 remains unchanged except deletes item 3, “The PHA certifies that there has been no change, significant or otherwise, to the Capital Fund Program (and Capital Fund Program/Replacement Housing Factor) Annual Statement(s), since submission of its last approved Annual Plan. The Capital Fund Program Annual Statement/Annual Statement/Performance and Evaluation Report must be submitted annually even if there is no change.” and redesignates items (4), (5), (6), (7), (8), (9), (10), (11), (12), (13), (14), (15), (16), (17), (18), (19), (20), (21), and (22), as (3), (4), (5), (6), (7), (8), (9), (10), (11), (12), (13), (14), (15), (16), (17), (18), (19), (20), and (21), respectively.

The burden hours in this collection represent the average number of hours for Qualified PHAs to prepare and submit 5-Year PHA Plans and related certifications and documents only, and Non-Qualified PHAs to complete the Annual and 5-Year PHA Plan template, CFP forms, and additional certifications and documents as attachments to the PHA Plan based on such factors as the size and designation of the PHA, and number of programs administered by the PHA. PHAs that are in Troubled performance status will not be considered Qualified PHAs and will be required to submit Annual and 5-Year PHA Plans. Qualified non-troubled PHAs with 550 or fewer units are exempt under HERA from the requirement to prepare and submit Annual PHA Plans and need only submit 5-Year PHA Plans describing their mission, goals, and objectives to serve the housing needs of low income families. Qualified PHAs no longer submit Capital Fund Program (CFP) forms HUD-50075.1, Annual Statement/Performance and Evaluation Reports or CFP Five-Year Action Plans (form HUD 50075.2). Information on capital improvement needs contained in those forms, which is an Annual PHA Plan component Qualified PHAs no longer have to prepare or submit may be required under a separate process. For information on Capital Fund Program requirements as they apply to Qualified and Non-Qualified PHAs beginning in Federal Fiscal Year (FFY) 2009, see PIH Notice 2009-33, Capital Fund Program Awards for FY 2009, issues September 2, 2009, and go to the Office of Capital Improvements (OCI0) website at <http://www.hud.gov/offices/pih/programs/ph/capfund/index.xfm>. Consequently, the reduction of burden hours brought about by HERA is reflected in this proposed collection.

1. **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.**

N/A.

1. **If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The expiration date will be displayed on the collection instrument.

1. **Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.**

No exceptions.

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

This collection of information will not be used for statistical purposes.