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## 19. Certification for Paperwork Reduction Act Submissions

On behalf of the U.S. Department of Housing and Urban Development, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9.

**Note:** The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320/8(b)(3), appear at the end of the instructions. The certification is to be made with reference to those regulatory provisions as set forth in the instructions.

The following is a summary of the topics, regarding the proposed collections of information, that the certification covers:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities;
- (d) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) It indicates the retention periods for record keeping requirements;
- (g) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
  - (i) Why the information is being collected;
  - (ii) Use of the information;
  - (iii) Burden estimate;
  - (iv) Nature of response (voluntary, required for a benefit, or mandatory);
  - (v) Nature and extent of confidentiality; and
  - (vi) Need to display currently valid OMB control number;
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to collected (see note in item 19 of the instructions);
- (i) It uses effective and efficient statistical survey methodology; and
- (j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in item 18 of the Supporting Statement.

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Signature of Program Official:

Date:

David A. Vargas, Deputy Assistant Secretary  
Real Estate Assessment Center

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Signature of Senior Officer or Designee:

Date:

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

# Supporting Statement for Paperwork Reduction Act Submissions

## A. Justification

1. The Department's Uniform Physical Condition Standards (UPCS) regulation (24 CFR part 5, subpart G) provides that HUD housing must be decent, safe, sanitary, and in good repair. HUD insured/assisted/funded multifamily (MF) property owners and public housing agencies (PHAs) must maintain housing in a manner that meets prescribed physical condition standards to be considered decent, safe, sanitary, and in good repair. The UPCS regulation also provides that all area and components of the housing must be free of health and safety hazards.

HUD conducts physical inspections of the HUD-funded housing to determine if the UPCS standards are being met. Pursuant to the UPCS inspection protocol, at the end of the inspection (or at the end of each day of a multi-day inspection) the inspector provides the property representative with a copy of the "Notification of Exigent and Fire Safety Hazards Observed" form. Each exigent health and safety (EHS) deficiency that the inspector observed that day is listed on the form. The property representative signs the form acknowledging receipt.

PHAs are to correct EHS deficiencies (i.e., emergency work orders) within 24 hours (24 CFR part 902; **Exhibit A**). PHAs are to notify the Department in writing within three business days of the date of inspection, which is the date the PHA was provided notice of these deficiencies, that the deficiencies were corrected within the prescribed time frames.

2. HUD will use the data it collects to monitor compliance with regulatory requirements and to assist in ensuring the correction of EHS deficiencies on HUD assisted properties. HUD staff will review the certifications and conduct applicable follow-up activities.

Attached and labeled **Exhibit B** is a copy of templates the PHAs complete to certify to the correction or mitigation of the EHS deficiencies cited in the inspection reports. Upon completion of the screens, the data is transmitted to HUD via the Internet. Also attached for reference and labeled **Exhibit C** is a copy of the OMB Disclosure that appears on the screen when the PHAs enter the system to submit the EHS Certificate.

3. The requested data is transmitted to HUD electronically, increasing data accuracy and reducing respondent burden. A PHA that is unable to submit data electronically due to an administrative or cost burden may be approved to submit the required information manually.
4. There will be no duplication of information. There is no similar information already available that could be used or modified.
5. The only entities that may be adversely impacted by any costs associated with HUD's electronic reporting requirement are small PHAs that do not have any, or have limited, web access and computer experience. Any adverse impact is further lessened due to the frequency of inspections of small PHAs (biennially). The Department makes guides available on the HUD website, provides training, and offers other technical assistance on the process.
6. The correction of deficiencies and the prompt correction of emergency work orders is a long-standing regulatory requirement of entities that conduct business with HUD. For PHAs, the PHAS management operations indicator requires the correction of emergency work orders within 24 hours. Without this information, HUD's interest (as well as the interest of taxpayers) will be unprotected and HUD will not be able to identify the risks due to neglected maintenance of HUD assisted property. Additionally, because the deficiencies are life threatening, it is in the best interest of the residents to ensure that identified deficiencies are immediately corrected/mitigated. Furthermore, evaluation of submitted data may impact funds used to achieve HUD program obligations, or to detect fraud, waste and abuse.

7. Because the electronic submission process requires respondents to submit confidential data, HUD has provided each program participant with a unique user identification code, limited the information available via its assessment system to employees with approved security access to the system, and allowed submitters “read-only” capability that will allow them to view their submitted data via the Internet.
8. The Department published a Notice of Proposed Information Collection for Public Comment in the *Federal Register* on October 28, 2010, Volume 75; Page 66384. (**Exhibit D**). The public was given until December 27, 2010 to submit comments on the proposal. The Department received no comments on this proposed collection. Additionally, the thirty day notice was published on January 11, 2011 (Vol. 76, page 1627).
9. No payments or gifts are provided.
10. All data that can be linked to a particular PHA is secured from public access. When a PHA submits data electronically to HUD, security prevents users outside of HUD from intercepting this data. HUD’s web access security system ensures that all management data is secure. The authorities or justifications for the security system are: the Information Security HUD Handbook 2400.24, the Computer Security Act of 1987, the Clinger-Cohen Act of 1996, OMB Circular A-130 part 3, and the Government Information Security Reform Act of 2000 (GISRA). The Department’s web access security system allows users to apply online for an ID and password and to reset a forgotten password. It also controls and limits access to systems for authorized users by managing the roles and responsibilities for each user of each system.  
 There are primary and secondary users. Secondary users are granted read-only access to the system. (This is similar to the access that users submitting information have; however, the user only is able to see his/her submission.) HUD authorized primary users (i.e., selected staff) have security access to update the information, with strict controls of the tasks that they may perform.
11. No such questions are asked.
12. The estimated burden hours for the collection of this data are provided in the tables below. The total burden hours are calculated using the average number of PHAs that will respond each year. Each year PHAs that do not have any EHS deficiencies cited do not complete the templates or make this submission, therefore, the number of respondents for each the annual reporting requirement is less than the total number of PHAs. For PHAs, the burden hour calculations are based on the number of EHS deficiencies identified during the inspection of all of the properties operated by the PHA.

All of the calculations assume that the time to complete the template depends on the number of EHS deficiencies because there is data to input for each observed deficiency.

**Total Burden Hour Estimates for PHAs**

<b>Number of EHS Deficiencies</b>	<b>Number of Respondents*</b>	<b>Frequency of Requirement**</b>	<b>X</b>	<b>Est. Avg. Time for Requirement (Hours)</b>	<b>=</b>	<b>Est. Annual Burden (Hours)</b>
1 – 5	923	.6		0.3		166.14
6 – 10	158	.6		0.5		47.4
11 – 20	94	.6		0.75		42.3
21 – 30	29	.6		1.2		20.88
31 – 50	34	.6		1.5		30.6
50 +	25	.6		1.75		26.25
<b>Subtotals</b>	<b>1,263</b>					<b>333.57</b>

\* PHAs that have no EHS deficiencies are not included.

\*\* The frequency shown is an annualized rate. It is based on each PHA having its properties inspected every other year and 20% of PHAs having their properties inspected every year.

<b>Total Estimated Annual Costs to Respondents</b>						
	<b>Number of Respondents</b>	<b>Total Burden Hours</b>	<b>X</b>	<b>Hourly Rate</b>	<b>=</b>	<b>Annualized Cost</b>
<b>PHA Submissions</b>	1,263	333.57		\$28.88*		\$9,633.50
* Hourly cost for response assuming a GS-12, Step 1 (\$60,274), Analyst or Manager, hourly rate is 28.88.						

13. There are no additional costs to respondents.

14. The estimated annualized costs to the federal government, based on a GS-12, Step 1 rate are provided below. A GS-12 Step 1 rate is the average salary for a Field Office Analyst/Manager.

<b>Total Estimated Annual Costs to the Federal Government</b>						
	<b>Number of Respondents</b>	<b>Total Burden Hours</b>	<b>X</b>	<b>Hourly Rate</b>	<b>=</b>	<b>Annualized Cost</b>
<b>PHA Submissions</b>	1,263	333.57		\$28.88 *		\$9,633.50
* Hourly cost for response assuming a GS-12, Step 1 (\$60,274), Analyst or Manager; hourly rate is \$28.88.						

15. The decrease in the number of burden hours is due to PHAs receiving fewer EHS deficiencies as a result of better maintenance on their part that results in better physical condition inspections. In addition, there are fewer AMPs than there were properties in 2007. Therefore, there are fewer inspections, so a lower proportion of buildings and units were actually inspected.

16. None of the information collected will be published.

17. HUD is not seeking approval to not display the expiration date of the OMB approval. The OMB number and the new expiration date will be displayed on a “Disclosure Statement” that will be the first screen that is viewed on the automated form after OMB approval is received.

18. There are no exceptions to item 19 of the OMB 83-I.

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

There are no collections of information employing statistical methods.