



**DEPARTMENT OF HOUSING PRESERVATION  
AND DEVELOPMENT**

SHAUN DONOVAN, Commissioner

**Office of Intergovernmental Affairs**

DIVISION OF INTERGOVERNMENTAL AFFAIRS  
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JOSEPH ROSENBERG, Deputy Commissioner  
ALEXANDRA SEWELL, Assistant Commissioner, Federal Legislative Affairs

July 11, 2007

Juanina B. Harris, Reports Liaison Officer  
Office of Fair Housing and Equal Opportunity  
U.S. Department of Housing and Urban Development  
451 7th Street, SW., Room 5124  
Washington, DC 20410

Subject: Notice of Proposed Information Collection: Comment Request; Economic Opportunities for Low- and Very Low-Income Persons [Docket No. FR-5119-N-01]

Dear Ms. Harris:

The New York City Department of Housing Preservation and Development (HPD) appreciates the opportunity to submit comments on the above-referenced notice. HPD has just completed a 6-month internal review of Section 3 procedures, data collection and reporting, so we are particularly interested in HUD's proposed Section 3 Summary Report (Revised HUD Form 60002).

HPD recommends eliminating columns D and E on Form 60002 since the intent of the statute is to capture the number of Section 3 hires. Collecting data on the percentage of hours worked is an onerous requirement, especially for a large agency. HPD has been advised by its HUD-contracted technical assistance consultants, Training & Development Associates, that only columns B, C, & F on Form 60002 are mandatory fields. If HUD determines that retaining all 5 columns is necessary, we hope you will make the distinction between mandatory and optional reporting clear, and separate out the optional from mandatory columns.

HPD believes that with these suggested amendments HUD will still be able to effectively monitor program recipients' compliance with the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended.

Thank you for the opportunity to comment, and for your consideration of our suggestions. If you have any questions, please feel free to contact me at (212) 863-8402.

Sincerely,

Alexandra Sewell

