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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) appears 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 recordkeeping 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 PHAs 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:  X Dominique Blom, Deputy Assistant Secretary	Date:
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Signature of Senior Officer or Designee:  X Colette Pollard, Departmental Reports Management Officer, Office of the Chief Information Officer	Date:
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## Supporting Statement for Paperwork Reduction Act Submissions

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### A. Justification:

#### 1. Why is this information necessary?

On February 17, 2009, the President signed the American Recovery and Investment Act (“the Recovery Act”). Section 1512 of the Recovery Act outlines the reporting requirements for the use of Recovery Act funds and requires recipients to report quarterly. This collection details reporting requirements of the Recovery Act for HUD Recovery grants. This information collection is for the reporting requirements only and does not include any of the information collection in the grant applications.

Office of Management and Budget guidance requires that “the use of all funds by recipients is transparent to the public, and the public benefits of these funds are reported clearly, accurately, and in a timely manner.” For Recovery Act grants only, HUD is incorporating HUD form 50075.1 into the RAMPS data collection to demonstrate that Recovery Act funds were appropriately obligated and expended on HUD identified Core Activities: 1) providing new or rehabilitated housing and 2) improving energy efficiency of HUD Public Housing stock. Currently, HUD form 50075.1 is paper-based and the data obtained is unable to be aggregated. Through incorporating HUD Form 50075.1, HUD will be able to aggregate Recovery Act recipient data to report the estimated project costs versus the actual dollars obligated and expended on Capital Fund core activities to Congress and the public. The information collected from HUD form 50075.1 will demonstrate the actual return on investment for Recovery Act Public Housing funds.

Only HUD Recovery Act Grantees who expend funds on the Core Activities are required to report. Other programs, such as Homelessness Prevention, do not have to respond. Public Housing Capital Fund, Native American Housing Block Grant, Indian Community Development Block Grant, Community Development Block Grant, Lead and Healthy Homes Programs, Assisted Housing Green Retrofit, and HOME Investment Partnership grantees have unit rehabilitation and/or unit construction as one of their Core Activities and would be subject to this collection.

A significant share of HUD’s Recovery Act funds were devoted to energy efficiency or green building programs, including the following:

- the Public Housing Capital Fund (PHCF) - \$4 billion invested in energy efficient modernization and renovation of our nation's critical public housing inventory, and
- the Green Retrofit Program for Multi-family Housing (GRP) - \$250 million invested in energy efficient modernization and renovation of housing of privately-owned rental housing receiving project based rental assistance.

We are revising the OMB 2577-0264 collection titled “**American Recovery and Reinvestment Act Capital Fund Recovery Competition and Capital Fund Recovery Formula Grants Reporting**” that was approved in November 2010, to include HUD form 50075.1. In this expansion, HUD will electronically collect HUD form 50075.1 utilizing a web-based application and recipients will be required to complete the form online through RAMPS with data being pre-populated to the greatest extent possible. This enhancement will only be applied to Recovery Act grants.

## **2. How is this information to be used?**

Office of Management and Budget guidance requires that “the use of all funds by recipients is transparent to the public, and the public benefits of these funds are reported clearly, accurately, and in a timely manner.” It is imperative that HUD demonstrate that Recovery Act funding was appropriately obligated and expended on HUD identified Core Activities: 1) providing new or rehabilitated housing and 2) improving energy efficiency of HUD stock.

By collecting this information, HUD will be able to report to Congress and the public the total number of housing units rehabilitated and developed using Recovery Act funds and also provide the energy efficiency measures provided rehabilitating or developing housing units. The energy efficiency information will be analyzed to determine the energy savings that resulted from the adoption of energy efficiency measures when rehabilitating or developing new housing units. HUD will also be able to identify the mix of funding sources used to accomplish the program objectives. By incorporating HUD Form 50075.1, HUD will be able to aggregate Recovery Act recipient data to report the estimated project costs versus the actual dollars obligated and expended on Capital Fund core activities to Congress and the public. The information collected from HUD form 50075.1 will demonstrate the actual return on investment for Recovery Act Public Housing funds. This enhancement will only be applied to Recovery Act grants.

## **3. Describe whether, and to what extent, the collection of information is automated?**

The data will be collected utilizing a web-based application. Recipients will be required to complete the form online. To the greatest extent possible, all data will be pre-populated to minimize data entry. Once the initial file is created, recipients will be able to update the same file and submit on an ongoing basis.

Programs, such as such as HOME Investment Partnership, Community Development Block Grant, Lead Hazard Control and Healthy Homes grant programs, that have an existing system will not be required to report into this new web-based application and should continue reporting using their current system as this information will also be incorporated into those systems to be transferred into the web-based application mentioned above.

## **4. Duplication of Information**

This information is not being collected elsewhere. The information being collected is specific to current funding. Therefore the information has not been previously collected.

The HUD Core Activity information is not being collected elsewhere. The current HUD Form 50075.1 is not pre-populated. This Recovery Act version will be electronically pre-populated with Core Activity information. The expected outcomes of this Recovery Act enhancement are improved reporting accuracy and decreased reporting burden hours since the HUD Form 50075.1 will be pre-populated. This pre-populated HUD Form 50075.1 can be submitted in lieu of the non-pre-populated, paper-based version for Capital Fund Recovery Act grants. Therefore, there will be no duplication of information.

## **5. Does the collection of information impact small businesses or other small entities?**

Some of the recipients of Recovery Act funds subject to this data collection may be small entities, such as a small Public Housing Authority. The impact is expected to be minimal.

**6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

Office of Management and Budget guidance requires that “the use of all funds by recipients is transparent to the public, and the public benefits of these funds are reported clearly, accurately, and in a timely manner.” It is imperative that HUD demonstrate that Recovery Act funding was appropriately obligated and expended on HUD identified Core Activities: 1) providing new or rehabilitated housing and 2) improving energy efficiency of HUD stock. The HUD Form 50075.1 is critical to identifying and aggregating the actual dollars obligated and expended on Capital Fund modernization and development core activities. The energy savings and greenhouse gas emissions reduced is a key public benefit of the Recovery Act funds. This data collection is critical in demonstrating the actual return on investment for Recovery Act Public Housing funds and accurately reporting this benefit to Congress and the public.

If the collection effort is not conducted, information will not be available on the number and types of units improved or developed. HUD would not have a way to account for energy efficiency improvements made by Recovery Act spending or track project estimates versus actual project performance on specific Capital Fund core activities. Furthermore, HUD would not be able to accurately report on its core measures or demonstrate the actual return on investment for Recovery Act Public Housing funds to Congress and the public.

**7. Explain any special circumstances**

There are no special circumstances.

**8. Identify the date and page number of the Federal Register notice soliciting comments on the information.**

A notice of proposed information collection for HUD Recovery Act Programs was published in the Federal Register on XXXX XX, XXXX, page XXXXX to solicit public comment. No comments were received.

**9. Explain any payments or gifts to respondents, other than remuneration of contractors or grantees.**

No payments or gifts to respondents are provided.

**10. Describe any assurance of confidentiality provided to respondents.**

Only summary level data will be made available to the public. Any sensitive information, such as individual address of residences that receive Recovery Act funding, will not be disclosed. Information at the Grantee level is not sensitive and there is no need for confidentiality.

**11. Justify any questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private.**

The information collected does not contain questions of a sensitive nature.

**12. Annual Reporting Burden**

HUD Recovery Act Grantees who are required to report include those that are expending funds on the core activities of new unit development and unit rehabilitation and energy efficiency improvements. Recipients of some other program funds, such as Homelessness Prevention, do not have to respond to this survey.

5,500 entities will be surveyed over the internet. Average time to complete the survey is 36 minutes. Respondents will be surveyed four times annual, once every quarter. Each respondent will spend an additional 3.5 hours collecting the data required to accurately complete the survey. The current OMB approved total burden hours for 5,500 entities reporting their core activities are 90,222. The revision to the current approved collection will increase the 90,222 labor burden hours by 24,710 hours for a total of

114,932 hours. For the 3,530 entities obligating and expending Capital Fund Recovery Act funds, the HUD Form 50075.1 will be surveyed over the internet within the Core Activities module. Average time to complete the HUD Form 50075.1 survey is 7 hours. Respondents will be surveyed annually, based on each Public Housing Authorities fiscal year end. Total burden hours for the 3,530 entities reporting their HUD Form 50075.1 are 24,710 hours. The total burden hours are 90,222 + 24,710 = 114,932 hours.

The costs estimated below are based on an estimated labor rate of \$38.92 (GS-13 Step 5 equivalent). Based on the information described in item 12, the costs are:

**Current Approved Labor Hours for Core Activities Module**

5,500 respondents * 4.101 hours/respondent * 4/year	=	90,222 labor hours annually
90,222 labor hours * \$38.92 per hour	=	\$3,511,440.24

**Proposed Additional Labor Hours for Annual Statement HUD Form 50075.1**

3,530 respondents * 7 hours/respondent * 1/year	=	24,710 labor hours annually
24,710 labor hours * \$38.92 per hour	=	\$961,713.20

The total effort is estimated to be 114,932 labor hours (\$4,473,153.44) for this requirement.

The annual reporting burden hours for reporting are based on the Recovery Act requirement that each recipient submits a separate report for each project. We estimate an average of approximately 2 projects will be funded per recipient. We further estimate that, on average, a response time of 0.30 hours will be required to report on each project with a total of 0.6 hours.

**13. Additional Cost to Respondents**

There are no additional costs to respondents other than what is reported in Item 12.

**14. Annualized cost to the Federal Government**

Estimated annualized cost for collection of information is \$4,473,153.44 (114,932 labor hours annually x \$38.92 estimate hourly cost). The estimated hourly cost figure of \$38.92 is determined for an experienced professional that approximates the hourly (mid-range) salary of a GS-13 Step 5 employee. Individual ARRA grantees charge their costs for this data collection as ARRA project management and administration costs. The annualized cost is funded by the Federal government.

**15. Explain any program changes or adjustments.**

This is a revision of a previously approved collection.

**16. If the information will be published, outline plans for tabulation and publication.**

The results of this information collection will not be published.

**17. OMB Expiration Date**

HUD is not seeking approval to avoid displaying the OMB expiration date.

**18. Certification of Paperwork Reduction Act Submission**

There is no exception to Item # 19 "Certification of Paperwork Reduction Act Submission."

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

The collection of information does not employ statistical methods.