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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 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 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.

Signature of Program Official:  Nicole Faison, Director Office of Public Housing Programs	Date:
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Signature of Senior Officer or Designee:  X Lillian L. Deitzer, Departmental Paperwork Reduction Act Officer, Office of the Chief Information Officer	Date:
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# Supporting Statement for Paperwork Reduction Act submissions

## Part A. Justification

### A1. Circumstances That Make the Collection of Information Necessary

A survey is needed in order to respond to Congress and the mandate under the Energy Conservation Policy Act (42 U.S.C. 8251 et seq.) The information collected from the survey will be used to accurately create reports and strategies to reduce utility expenses through energy conservation measures of public housing. Thereafter, reports will be updated and sent to Congress every 2 years indicating energy strategies for energy reduction goals and how the Department of Housing and Urban Development will monitor the energy usage of public housing agencies.

Additionally, Deputy Secretary Bernardi's letter of November 15, 2006, requested Principal Staff to consider the energy measures in the report to Congress and incorporate actions and measures in the Management Plan for Fiscal Year (FY) 2007 and FY 2008 to ensure that substantive steps are taken to reduce energy consumption and costs in Departmental programs. Public and Indian Housing (PIH) is committed to taking steps to improve the energy efficiency of its PIH stock, particularly as it helps Public Housing Authorities (PHAs) transition to Asset Management. Specifically, PIH has vigorously supported the Department's Energy Action Plan by encouraging PHAs to actively participate in undertaking cost effective energy conservation measures.

Authority: 24 CFR Part 965, Subpart C.

### A2. How and By Whom the Data Will Be Used

#### A2.1 Project Overview

The survey will gather information on the use and procurement of Energy Star products in Public and Indian Housing. In Addition, it will gather information pertaining to energy and water efficiency audits. A survey will be posted electronically via the internet and PHAs will voluntarily complete the questionnaire and electronically respond by clicking "Submit" on the form.

#### A2.2 Purpose of the Data Collection

The proposed study will fulfill two important needs for HUD. First, the study will allow HUD to develop and implement an integrated strategy to reduce utility expenses through cost-effective energy conservation and efficiency measures. Second, as mandated by the Energy Conservation Policy Act 42 U.S.C. 8251, HUD can accurately report its energy conservation measures developed for public and assisted housing.

#### A2.3 Who Will Use the Information

Contractors will collect and analyze the reported data in order to produce energy strategies for energy conservation measures. HUD staff will use the survey results to better understand energy usage and how to best implement conservation measures in support of governmental programs and the housing industry.

### A3. Use of Improved Technologies

The posting and collections of survey information will be electronically. However, the respondent has the option to fill out a paper copy of the survey and submit it by mail to Public and Indian Housing Survey.

### A4. Effort to Avoid Duplication

As part of this information collection request, efforts have been taken to carefully identify and modify the survey form to assure that it's questions are different in nature of any previous survey pertaining to energy conservation efforts. Questions are specifically designed to quantify the use of ENERGY STAR products verify the currency and quality of the last energy audit.

**A5. Involvement of Small Entities**

The survey is simple, concise and can be completed with information that is part of customary and usual business practices. It requires no calculations by respondent and can be returned electronically by clicking on “Submit” at the end of the form.

**A6. Consequences of Less Frequent Data Collection**

Collection of this information is mandated by statute. The survey information is required in order to respond to Congress biannually.

**A7. Special Circumstances**

There are no special circumstances related to this information collection that would require information to be collected more than annually.

**A8. Identify the date and page number of the publication in the Federal Register of the agency’s notice**

On July 2, 2007, pages 36018 and 36019, a Notice of Proposed Information Collection was published in the Federal Register soliciting public comment on the proposed information collection. The comment period ended on August 31, 2007. No comments were received.

**A9. Payments to Respondents**

No payment or gifts to respondents are involved.

**A10. Arrangements and Assurances Regarding Confidentiality**

There are no assurance of confidentiality provided to respondents.

**A11. Sensitive Questions**

There are no questions of a sensitive nature.

**A12. Estimate of Annualized Burden Hours**

Exhibit 1 provides information on the survey to be used in the study and the estimated time to complete the data collection.

- Indicate number of respondents: 3200
- Frequency of response: 1/ year
- Annual hour burden: 10 minutes per respondent
- Explanation of how burden was estimated: In-house trial and sampling of two local PHAs. Information requested should be available as part of customary and usual business practices.

**Exhibit A  
Respondent Burden**

PHA Plan Elements and Regulation	No. of Respondents		X	Frequency of Response	Total Responses	X	Estimated Hours	=	Total Annual Burden Hours
	PH/HCV	HCV only							
ENERGY STAR and Energy Audit Survey	3200			1	3200		.167		533
<b>TOTALS</b>	3200			1	3200		.167		533

Burden hours estimates are based on a total of 3,200 PHAs.

**A13. Estimate Record Keeping and Reporting cost Burden on respondents**

There is no cost to respondents, other than the time required to respond to the survey.

**A14. Estimated Cost to the Federal Government**

There is no cost to the Federal Government associated with conducting the survey.

**A15. Reasons for Changes in Burden**

This information to OMB is a new request for approval: there are no changes in burden.

**A16. Tabulation Plan, Statistical Analysis, and Study Schedule**

Data to be collected upon OMB approval.

**A17. Expiration Date Display Exemption**

Expiration date will be displayed.

**A18. Exceptions to Certification**

This submission describing data collection requests no exceptions to the Certificate for Paperwork Reduction Act (5 CFR 1320.9).

**PART B**

**Statistical Methods**

Not applicable. No statistical methods will be employed to collect the information.