

19. Certification for Paperwork Reduction Act Submissions

On behalf of this Federal Agency, 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: X	Date:
Signature of Senior Officer or Designee: X Colette Pollard, Departmental Reports Management Officer Office of Chief Information Officer	Date:

Supporting Statement for Paperwork Reduction Act Submissions

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.

Housing that is insured and/or assisted under certain HUD programs is required to be inspected using the Uniform Physical Condition Standards (UPCS) in accordance with 24 CFR Part 5, Subpart H. (See attached **Exhibit A.**) These standards are intended to ensure that such housing is decent, safe, sanitary and in good repair. HUD's Section 8 housing, public housing, HUD-insured multifamily housing, and other assisted housing are subject to uniform physical standards. To the extent feasible, the physical inspection procedures by which the standards will be assessed should be uniform in the covered programs.

The UPCS and inspection process is designed to achieve the following three objectives: (1) consistency in physical condition standards for HUD housing; (2) standardization of the inspection to be undertaken to determine compliance with the standards; and (3) implementation of an electronically-based inspection system to evaluate, rate, and rank the physical condition of HUD housing objectively.

Depending on the results of its physical condition inspection, a multifamily property will be assigned one of three designations with the accompanying inspection time lines: (1) standard 1 performing is a property that scores 90 points or higher and will undergo a physical inspection once every three years; (2) standard 2 performing is a property that receives a score of 80 points or higher but less than 90 points and will undergo a physical inspection once every two years; and (3) standard 3 performing is a property that receives a score of less than 80 points and will undergo an annual physical inspection.

Section 502 of the National Affordable Housing Act of 1990, as amended by the Quality Housing and Work Responsibility Act of 1998, implements section 6(j) of the United States Housing Act of 1937. Section 6(j) establishes specific assessment indicators and directs the Secretary to develop additional indicators to assess the management performance of public housing agencies (PHAs) in all major areas of management operations. One of the assessment areas is the Physical Condition Indicator.

All PHA properties are required to be assessed under the Physical Condition Indicator by HUD in accordance with the Public Housing Assessment System (PHAS) regulation, 24 CFR part 902, Subpart B. (See attached **Exhibit B.**) For PHAs with 249 or fewer units, their properties will be inspected every two or three years based on the PHAs overall PHAS score. For PHAs with 249 or fewer units that are designated troubled, their properties will be inspected annually. For all PHAs with 250 or more units, each property will be assessed based on that property's score. A property with a score of 90 or higher will be assessed every three years; a property with a score of 80 but less than 90 will be assessed every two years; and a property with score of less than 80 will be assessed annually. Finally, PHAs with 250 or more units that are designated troubled will have all of their properties inspected annually.

In order to conduct physical condition inspections of approximately 14,000 multifamily and PHA projects annually, HUD utilizes contract inspectors that are trained in the UPCS protocol and certified by PIH-REAC

There are no substantive changes to the questionnaire. The changes that have been made provide more descriptive language in the inspection experience paragraph and add specific examples to two of the answers under the Technical Knowledge in Commercial and Residential Building Trades question. In addition, in response to HUD's Office of General Counsel, an additional certification was included under "Related Information."

2. 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 received from the current collection.

The respondents will be individuals who seek to become HUD certified physical condition inspectors. They provide information to HUD regarding past experience via email using the Inspector Candidate Assessment Questionnaire. This questionnaire provides PIH-REAC with basic knowledge of an individual's inspection skills and abilities. For example, the ability to use the Internet is desirable in order to upload inspection reports to PIH-REAC.

3. 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.

This form is automated and submitted via the Internet. The electronic submission of this data results in significant benefits, such as cost savings from reduced need for paper submission; and faster HUD review and analysis. In addition, electronic submission reduces the administrative burden that manual submission presents to HUD program participants and HUD staff alike. **Exhibit C** attached is the template.

4. 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.

There will be no duplication of information. There is no similar information already available that may be used or modified for the purpose described in the response to question 2, above.

5. 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.

This collection of information does not impact small businesses or other small entities. HUD believes that these costs are minimal since the submission of the questionnaire is via the Internet

6. 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.

The requirement for the physical inspection of multifamily and public housing properties is statutory and regulatory. Due to the volume of physical inspections conducted annually by HUD, it is most cost effective to use contract inspectors. Without the physical inspections, 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 or insolvency of a multifamily or public housing property. Furthermore, evaluation of submitted data may impact funds used to achieve HUD program obligations, or to detect fraud, waste and abuse.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
 - requiring respondents to report information to the agency more than quarterly;
 - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - requiring respondents to submit more than an original and two copies of any document;
 - requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
 - in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;
 - requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
 - that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
 - requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances applicable to this questionnaire

8. 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. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

This information collection was announced in the *Federal Register*, Volume 76, page 65742, on October 24, 2011. The public was given until December 23, 2011, to submit comments on the proposal. HUD received no comments on this proposed collection.

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

No payment or gifts are provided to respondents.

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

The information on this questionnaire does include limited sensitive information to identify the individual submitting the questionnaire. It is maintained in the system.

11. Provide additional justification for any questions of a sensitive nature, such as sexual 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 “sensitive nature” questions are necessary to identify each individual who completes and submits an Inspector Candidate Assessment Questionnaire as a prospective inspector candidate. HUD must know who the person is that submitted the Questionnaire and wishes to be obtain benefits by having his/her prior knowledge and inspection skills and abilities assessed to determine if they meet the requirements to attend the UPCS training. HUD also must know which qualified individuals to invite to scheduled UPCS training if an individual meets the requirements, and after successful completion of the entire training program, which individuals will be certified as a HUD UPCS inspector authorized to conduct UPCS inspection of HUD insured and assisted properties pursuant to contracts with HUD and issued a unique personal ID. The collection is voluntary but is it required for individuals who elect to be considered to be trained as a HUD UPCS inspector candidate.

12. 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 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; and
 - 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 public burden hours is based on the actual annual number of application received over the past 2 ¾ years. In order to conduct physical condition inspections of approximately 14,000 multifamily and PHA projects annually, HUD utilizes contract inspectors that are trained in the UPCS protocol and certified by PIH-REAC. This questionnaire provides PIH-REAC with basic knowledge of an inspection candidate’s inspection skills and abilities, and a determination is then made as to whether an inspection candidate has the required basic skills and abilities.

Total Burden Hour Estimates						
Type of Burden	Number of Respondents	Annual Frequency of Requirement	X	Est. Avg. Time for Requirement (Hours)	=	Est. Annual Burden (Hours)
On-Line Application	800	1		.25		200
Documentation Copying	800	1		.75		600
Total						800

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information (do not include the cost of any hour burden shown in Items 12 and 14).
- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;

- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The estimate for the total annual cost burden to respondents is shown, below.

Total Estimated Annual Costs to Respondents						
	Number of Respondents	Total Burden Hours	X	Hourly Rate	=	Annualized Cost
Inspector Assessment Questionnaire	800	800		\$24.10*		\$19,280.00
* Hourly cost for response assuming an Analyst annual salary, GS-11, step 1, annual rate of \$50,287; hourly rate is \$24.10 (Salary Table 2011-GS).						

14. Provide estimates of annualized cost 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 expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The estimated annualized costs to the federal government, based on a GS-12, step 1, rate is provided in the table, below. A GS-12, step 1, rate is the average salary for an Inspector Administration Analyst.

Total Estimated Annual Costs to the Federal Government						
	Number of Respondents	Total Burden Hours	X	Hourly Rate	=	Annualized Cost
Inspector Assessment Questionnaire	800	800		\$28.88*		\$23,104.00
* Hourly cost for response assuming an Analyst annual salary, GS-12, step 1, annual rate of \$60,274; hourly rate is \$28.88 (Salary Table 2011-GS).						

15. Explain the reasons for any program changes or adjustments reported in Items 13 and 14 of the OMB Form 83-I.

No changes.

16. For collection 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.

The information collected will not be published.

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

HUD is not seeking approval to not display the expiration date of the OMB approval. The OMB approval number and expiration date will be displayed on the questionnaire. **Exhibit E** is the OMB Disclosure Statement.

18. Explain each exception to the certification statement identified in item 19.

There are no exceptions to the certification statement identified in Item 19 of the form OMB 83-i

B. Collections of Information Employing Statistical Methods

Not applicable.