
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.

Signature of Program Official:

Date:

X

Dominique Blom, Deputy Assistant Secretary

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. Why is this information necessary?

The proposed information collection is necessary because it will allow HUD to improve implementation of existing modernization and energy efficiency regulations, support Department Agency Performance Goal #13, and provide the ability to report to OMB on the progress of energy conservation measures (ECMs) being implemented by Public and Indian Housing (PIH) grantees. Regulations appearing at 24 CFR 965 Subpart C and 24 CFR 968.115 support national energy conservation goals by requiring PHAs to conduct energy audits and undertake certain cost-effective energy conservation measures.

HUD is creating the Capture Energy Efficiency Measures for PIH (CEEMP) data system to track the amount and types of Energy Conservation Measures (ECMs) being implemented within Public and Indian Housing (PIH) units. The CEEMP data system is necessary in order to support the Department's Agency Performance Goals (APGs), specifically APG #13 which sets numeric targets for completing green retrofits and creating energy efficient units.

Currently, the collection of PIH ECM data is limited to Recovery Act grantees covered under PRA 2577-0264, "American Recovery and Reinvestment Act Capital Fund Recovery Competition and Capital Fund Recovery Formula Grants Reporting". The collection of Recovery Act ECM data is handled through the Recovery Act Management Performance System (RAMPS). The RAMPS has created the method and template for the collection of ECM data. Now that PIH has an existing and proven method in RAMPS for collecting Recovery Act ECM data, PIH is taking this existing and proven data system template and migrating it to capture ECM data for PIH. Due to the impending end of the RAMPS data system upon the conclusion of the Recovery Act in 2012, PIH is engaging the RAMPS-to-CEEMP data system migration at an accelerated pace before the RAMPS data system discontinues in 2012.

The CEEMP system is based on RAMPS template and will largely mirror the RAMPS; however, there are two primary differences in the scope of data collection and target audience between the two systems. Whereas the RAMPS collected encompassing, detailed unit data on Capital Fund Recovery Act grantees, the CEEMP system will collect specifically energy efficiency unit data on all PIH units. Consequently, the target audience is being expanded from specifically Capital Fund Recovery Act grantees to all PIH grantees including PIH Native American grantees. Although the CEEMP system will have an increased target audience of all PIH grantees, the information collected from grantees is reduced from the encompassing unit data submission requirements of RAMPS to only the energy efficiency measures being implemented by PIH grantees. Therefore, the CEEMP PRA will have an increased number of respondents but the amount of time to complete the required submission will be reduced resulting in a projected labor burden increase of \$1,411,550.56 for a total of \$5,884,704.00. Based on the department's current experience with the RAMPS program, HUD anticipates the projected labor burden to steadily decrease over time as the grantees become familiar with navigating the CEEMP system and upon completing their initial report submission; each subsequent submission will be an update to the initial submitted report and will require less labor to complete.

HUD will electronically collect the ECM information utilizing a web-based application and recipients will be required to complete the collection online through CEEMP with data being pre-populated to the greatest extent possible. The CEEMP data system will only be applied to PIH grantees. Only PIH grantees that expend funds on modernization and development activities are required to report.

2. How is this information to be used?

HUD will use the CEEMP data system to monitor compliance with regulations at 24 CFR 965 Subpart C and 24 CFR 968.115, which require PHAs to conduct energy audits and undertake certain cost-effective energy conservation measures. The system will enable HUD to monitor the progress of ECM implementation for PIH units.

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

HUD will electronically collect the ECM information online utilizing a web-based application that will be pre-populated with data to the greatest extent possible to minimize data entry. Once the initial file is created, recipients will be able to update and submit the same file on an ongoing basis.

4. Duplication of Information

This information is not being collected elsewhere.

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

Many of the recipients of PIH funds subject to this data collection may be small entities, such as a small Public Housing Agency (PHA). 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.

If the collection effort is not conducted, information will not be available on the number and types of ECMs being implemented for PIH units. HUD would not have a way to account for energy efficiency improvements achieved through PIH expenditures or to track projected and actual performance on specific ECM activities. Without the implementation of the CEEMP data system, HUD will not be able to track PIH ECMs and will be unable to support the Department's APG #13. Furthermore by not collecting this information, it would inhibit HUD's ability to demonstrate the actual return on investment for PIH ECM expenditures.

7. Explain any special circumstances

There are no special circumstances involved in this collection.

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 Capture Energy Efficiency Measures for PIH (CEEMP) was published in the *Federal Register*, Vol. 76, No 235, page 76432 on December 7, 2011. HUD's responses to public comments are within the attachment.

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 social security numbers, tax identification numbers, individual address of residences that receive PIH 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

PIH grantees that expend funds on ECMs during the development or modernization of PIH units are required to report. The data collection will cover 3, 150 PHA’s with 12,600 active PIH grants. Average time to complete the survey is 30 minutes. Respondents will be surveyed four times annually, once every quarter. Each respondent will spend an additional 2.5 hours collecting the data required to complete the survey. The annual reporting burden hours are based on the requirement that each recipient submits a separate report for each active grant. The estimates for labor burden hours are upper limits and PIH anticipates that the actual labor burden will decrease somewhat as the grantee becomes familiar with the CEEMP data collection tool. Also, quarterly updates will require less labor than the initial submission.

PIH estimates that 151,200 hours of labor per year are required for this collection. Based on an estimated labor rate of \$38.92 (GS-13 Step 5 equivalent) the annual labor cost is \$5,884,704. The CEEMP PRA will have an increased number of respondents but the amount of time to complete the required submission will be reduced resulting in a projected labor burden increase of \$1,411,550.56 over RAMPS labor burden for a total of \$5,884,704.00. Based on our current experience with the RAMPS program, HUD anticipates the projected labor burden to steadily decrease over time as the grantees become familiar with navigating the CEEMP system and upon completing their initial report submission; each subsequent submission will be an update to the initial submitted report and will require less labor to complete.

CEEMP Labor Burden	# of Respondents	# of Responses Per Year (est. 4 active grants per PHA)	Time Per Response (hrs)	Times Respond Per Year	# of Labor Hours Per Year	Est. Labor Rate (GS-13 Step 5)	Labor Cost Per Year
Proposed Labor Burden	3,150	12,600	3	4	151,200	\$38.92	\$5,884,704.00

RAMPS Labor Burden	# of Respondents	# of Labor Hours Per Year	Est. Labor Rate (GS-13 Step 5)	Labor Cost Per Year
Proposed Labor Burden	5,500	114,932	\$38.92	\$4,473,153.44

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 \$5,884,704.00. The assumed hourly cost figure of \$38.92 is equivalent to the hourly (mid-range) salary of an experienced professional (i.e., a GS-13 Step 5 employee). The costs for this data collection are PIH project management and administration costs for individual grantees. The annualized cost is funded by the Federal government.

15. Explain any program changes or adjustments.

This is a new collection. The CEEMP system will have an increased target audience of all PIH grantees, the information collected from grantees is reduced from the encompassing unit data submission requirements of RAMPS to only the energy efficiency measures being implemented by PIH grantees. Therefore, the CEEMP PRA will have an increased number of respondents but the amount of time to complete the required submission will be reduced resulting in a projected labor burden increase of \$1,411,550.56 for a total of \$5,884,704.00. Based on the department's current experience with the RAMPS program, HUD anticipates the projected labor burden to steadily decrease over time as the grantees become familiar with navigating the CEEMP system and upon completing their initial report submission; each subsequent submission will be an update to the initial submitted report and will require less labor to complete.

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

The data will be tabulated, summarized, and published in various internal and external reports (including annual performance reports), and press releases. The data may also be used by researchers for the production of scholarly articles.

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."

B. Collections of Information Employing Statistical Methods.

The collection of information does not employ statistical methods.