Paperwork Reduction Act Submission

Please read the instruction before completing this form. For additional forms or assistance in completing this forms, contact your agency's Paperwork Reduction Officer. Send two copies of this form, the collection instrument to be reviewed, the Supporting Statement, and any additional documentation to: Office of Information and Regulatory Affairs, Office of Management and Budget, Docket Library, Room 10102, 725 Seventeenth St. NW, Washington, DC 20503.

1. Agency/Subagency Originating Request:
U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

2. OMB Control Number:
a. **2577-0226** b. ☐ None

3. Type of information collection: (check one)
a. ☐ Proposed Collection
b. ☐ Revision of a currently approved collection
c. ☐ Extension of a currently approved collection
d. ☐ Reinstatement, **without change**, of previously approved collection for which approval has expired
e. ☒ Reinstatement, **with change**, of previously approved collection for which approval has expired
f. ☐ Existing collection in use without an OMB control number

For b-f, note item A2 of Supporting Statement instructions.

4. Type of review requested: (check one)
a. ☒ Regular
b. ☐ Emergency - Approval requested by
c. ☐ Delegated

5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities?
☐ Yes ☒ No

6. Requested expiration date:
a. ☒ Three years from approval date b. ☐ Other (specify)

7. Title:
Public Housing 5-Year and Annual PHA Plan

8. Agency form number(s): (if applicable)

HUD-50075-ST, HUD-50075-SM-HP, HUD-50075-HCV, HUD-50075-QA, HUD 50075.1, HUD 50075.2, HUD-50077; HUD-50077-CR-HUD-50077-SM-HP, HUD-50077-SL, HUD-50070; HUD-50071; SF-LLL; SF-LLL-A

9. Keywords:
Housing, Public Housing, Annual PHA Plan, 5-Year PHA Plan

10. Abstract:
PHAs are required to submit annual and 5-Year Plans to HUD as required by section 5A of the United States Housing Act of 1937 (42 U.S.C. 1437c-1) The purpose of the plan is to provide a framework for local accountability and an easily identifiable source by which public housing residents, participants in the tenant-based assistance program, and other members of the public may locate basic PHA policies, rules and requirments concerning the PHA's operations, programs and services.

11. Affected public: (mark primary with "P" and all others that apply with "X")
a. Individuals or households
b. Business or other for-profit
c. Not-for-profit institutions
e. Farms
f. Federal Government
g. P State, Local or Tribal Government

12. Obligation to respond: (mark primary with "P" and all others that apply with "X")
a. Voluntary
b. X Required to obtain or retain benefits
c. **P** Mandatory

13. Annual reporting and recordkeeping hour burden:

a. Number of respondents	4053
b. Total annual responses	4053
Percentage of these responses collected electronically	100%
c. Total annual hours requested	20,290.22
d. Current OMB inventory	52512
e. Difference (+,-)	-32,221.78
f. Explanation of difference:	
1. Program change:	-32,221.78
2. Adjustment:	

14. Annual reporting and recordkeeping cost burden: (in thousands of dollars)
Do not include costs based on the hours in item 13.

a. Total annualized capital/startup costs	0.00
b. Total annual costs (O&M)	0.00
c. Total annualized cost requested	0.00
d. Current OMB inventory	0.00
e. Difference	0.00
f. Explanation of difference:	
1. Program change:	
2. Adjustment:	

15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X")
a. X Application for benefits
b. Program evaluation
c. General purpose statistics
d. Audit
e. P Program planning or management
f. Research
g. X Regulatory or compliance

16. Frequency of recordkeeping or reporting: (check all that apply)
a. ☐ Recordkeeping b. ☐ Third party disclosure
c. ☒ Reporting:
1. ☐ On occasion 2. ☐ Weekly 3. ☐ Monthly
4. ☐ Quarterly 5. ☐ Semi-annually 6. ☒ Annually
7. ☐ Biannually 8. ☒ Other (describe) Every 5 years

17. Statistical methods:
Does this information collection employ statistical methods?
☐ Yes ☒ No

18. Agency contact: (person who can best answer questions regarding the content of this submission)
Name: Shauna Sorrells
Phone: 202-402-2769

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: X Milan Ozdinec, Deputy Assistant Secretary, Office of Public Housing and Voucher Programs Office of Public and Indian Housing	Date:

Signature of Senior Officer or Designee: X Colette Pollard, Departmental Paperwork Reduction Act Officer, Office of the Chief Information Officer	Date:

Supporting Statement for Paperwork Reduction Act Submissions
Public Housing Agency Plans: OMB Control No. 2577-0226

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.

Section 511 of the Quality Housing and Work Responsibility Act of 1998 (P.L. 105-276, 112 Stat. 2461, enacted October 21, 1998 (referred to as the "Public Housing Reform Act") added Section 5A to the U.S. Housing Act of 1937 [42 U.S.C. 1437 *et seq;* see 1437c-1] that created a requirement that all public housing agencies (PHAs) develop public housing agency plans, consisting of a 5-Year Plan and an Annual Plan. The 5-Year Plan describes the mission of the agency and the agency's long-range goals and objectives for achieving its mission over the subsequent 5 years. The Annual Plan provides details about the agency's immediate operations, program participants, programs and services, and the agency's strategy for handling operational concerns, residents' concerns and needs, programs and services for the upcoming fiscal year.

Subsequent implementation of the PHA Plan, in accordance with Section 5A [42 U.S.C. 1437c-1(k)], allowed for submission of streamlined plans by high-performing PHAs, small PHAs with less than 250 public housing units that are not designated as troubled, or PHAs that only administer tenant-based assistance and do not own or operate public housing.

The previous OMB approval for this collection occurred on November 25, 2008, and reinstated through a change request the <u>*Certification by State and Local Official of PHA Plans Consistency with the Consolidated Plan*</u> (currently form HUD-50077-SL, which accompanies the form HUD-50075 PHA Plan template), which was inadvertently omitted from the prior extension and revision of this collection approved April 21, 2008. The certification had been included and received OMB approvals in previous ICR submissions to extend and/or revise the collection. OMB approved the Civil Rights certification language as part of form HUD-50077, Standard PHA Plan Certifications of Compliance, Item 6: "<u>*The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990".*</u> This same language will be submitted as a separate certification (form HUD-50077-CR) by Qualified PHAs, as defined by sections 2701 and 2702 of the Small PHA Paperwork Reduction Act, Title VII of the Housing and Economic Recovery Act (HERA) of 2008, which exempts PHAs with 550 or fewer public housing units and vouchers from the requirement to prepare and submit an annual PHA plan. These certification changes will have no significant impact on information collection burden.

Sections 2701 and 2702 of the Small PHA Paperwork Reduction Act, Title VII of the Housing and Economic Recovery Act (HERA) of 2008, (Public Law 110-289, H.R. 3221) enacted July 30, 2008, established new requirements regarding the PHA Plan for certain Qualified PHAs -- defined as those PHAs with less than 550 public housing units and Housing Choice Vouchers (HCV) combined that are not in "troubled" performance status. As stated in Section 2702, this collection provides Qualified PHAs an exemption from the requirement in Section 5A of the United States Housing Act of 1937, (the Act) to <u>prepare and submit</u> an Annual PHA Plan and supersedes applicable regulations on the PHA Plan, 24 CFR § 903, to the extent those regulations require the preparation and submission of an Annual PHA Plan by <u>**all**</u> PHAs. While no longer required to <u>prepare and submit</u> an Annual Plan, all PHAs are strongly encouraged to post their 5-Year PHA plans and all Annual PHA Plan elements on their website, as applicable. As indicated, a Qualified PHA is defined by HERA as follows:

> A public housing agency meeting the following requirements: (1) the sum of public housing dwelling units administered by the agency and the number of vouchers under Section 8(o) of the Act is 550 or fewer and (2) the agency is not designated as troubled under section 6(j) (2) and does not have a failing score under the Section Eight Management Assessment Program (SEMAP) during the prior 12 months.

Based on Section 2702 of HERA Qualified PHAs must meet the following requirements: 1) submit a 5-Year PHA Plan; 2) submit a Civil Rights certification; 3) annually conduct a public hearing to discuss any changes to the goals, objectives, and policies of the agency and invite public comment regarding such changes; 4) not later than 45 days before the date of the hearing, make all information relevant to the hearing and any determinations of the agency regarding those changes available for review and inspection at the PHA's principal office during normal business hours, and publish a notice informing the public that the information is available and a public hearing will be conducted; and 5) establish 1 or more resident advisory boards (RAB) and consult with and consider the recommendations of the RABs for the agency, at the annual public hearing regarding any changes to the goals, objectives, and policies of that agency.

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 from the current collection.

The PHA Plan ensures that the public housing agency (PHA) is accountable to the local community for choices it makes relative to the housing needs of low-income, very low income, and extremely low-income families. The information is collected from local, regional, or State public housing agencies who receive funds to operate Federal public housing or Section 8 tenant based-assistance (voucher) programs and transmitted to HUD via the Internet for the purpose of providing a comprehensive source document by which the Department, public housing residents, participants in the tenant-based assistance program, and other members of the public, can monitor the basic PHA policies, rules and requirements concerning the PHA's operations, programs and services. (24 CFR 903.3).

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.**

The information collection requirements covered by this submission require Non-Qualified and Qualified PHAs to download the consolidated 5-Year and Annual Plan template form HUD-50075, and related forms from HUD's PHA Plan website, fill out the information (5-Year Plan only for Qualified PHAs), attach additional information and certification forms as required, and transmit the documents by mail or electronically with scanned signatures, but electronic submission is encouraged to their local HUD Field Office for review/approval. HUD manually converts a submitted PHA Plan into a uniform readable format and posts it to an internal HUD website so appropriate field offices can review the PHA Plan for compliance. Approved PHA Plans are posted on the HUD website. HUD is moving toward implementation of an internet-based system, where agencies can log on-line and respond to PHA Plan questions directly without first downloading the template.

Future plans are to bring the PHA Plans utility in-house by the end of FY12. The same submittal process will be maintained by federal FTE. The earlier plans to make the PHA Plans an online system integrated within IMS (PIC) have been stalled due to IMS re-scoping and lack of funding. Also, SAGIS is now inactive which eliminates the other scenario.

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.**

The information collected in a 5-Year and Annual PHA Plan is not collected elsewhere. The 5-Year PHA Plan is a narrative of a PHA's mission, goals, and objectives for serving the needs of low, very-low, and extremely-low income families and needs of child and adult victims of domestic violence as required by the Violence Against Women Act (VAWA). Annual PHA Plans include an inventory of the PHA's policies and programs set forth in an abbreviated, but comprehensive format. Current efforts are underway to encourage PHAs to align their five year planning cycle and fiscal year with that of the local jurisdiction's Consolidated Plan and analyses of fair housing impediments in order to achieve more integrated planning across the board.

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.**

Public and Indian Housing programs typically define small PHAs as those with less than 250 public housing units or Housing Choice Vouchers. Section 3 [42 U.S.C. 1437a] defines a PHA to mean any State, county, municipality, or other governmental entity or public body (or agency or instrumentality thereof) which is authorized to engage in or assist in the development or operation of public housing. Sections 2701 and 2702 of the Small PHA Paperwork Reduction Act, Title VII of the Housing and Economic Recovery Act (HERA) of 2008, (Public Law 110-289, H.R. 3221) provide Qualified PHAs an exemption from the requirement in Section 5A of the United States Housing Act of 1937, (the Act) to prepare and submit an Annual PHA Plan, including related statements of capital improvements and supersedes the existing regulations on the PHA Plan, 24 CFR § 903, to the extent those regulations require the submission of an Annual PHA Plan by **all** PHAs. A Qualified PHA is defined by HERA as follows:

A public housing agency meeting the following requirements: (1) the sum of public housing dwelling units administered by the agency and the number of vouchers under Section 8(o) of the Act is 550 or fewer and (2) the agency is not designated as troubled under section 6(j) (2) and does not have a failing score under the Section Eight Management Assessment Program (SEMAP) during the prior 12 months.

With the passage of HERA and the Small PHA Paperwork Reduction Act, for purposes of PHA Plans, the universe of "small" PHAs is expanded to those that manage 550 or fewer such units. This collection significantly reduces administrative and paperwork burdens and associated costs for Qualified PHAs which represent approximately 68% of the PHAs that administer public housing programs. Section 2702 of HERA exempts Qualified PHAs from the preparation and filing requirements for the PHA Annual Plan, requiring only the submission of the 5-Year PHA Plan once every five years, unless there are any interim changes to the goals, objectives, and policies of the PHA. Qualified PHAs submit only the 5-Year PHA Plan, and Civil Rights certification, establish 1 or more Resident Advisory Boards (RAB) and consider their comments and recommendations, and conduct an annual public hearing to discuss changes to the goals, objectives, and policies of the agency, even if the PHA does not propose any changes. The currently proposed and revised form HUD-50075 has been developed into separate versions to reflect only the submission requirements of various types of PHAs, e.g. standard, troubled, small, high performing, and Section 8 or HCV Only. As pointed out in a public comment, notwithstanding HERA, the existing regulations in 24 CFR Parts 903.11 and 903.12 permitting submission of streamlined plans still stand. Therefore, HUD's intent is to replace the previous version of the form HUD-50075 used by all PHAs with versions of the form that contain only those elements required for submission by PHA type, and eliminate the need for PHAs to read through all elements and accompanying instructions to find those that are applicable.

Accordingly, the Annual PHA Plan submission requirements can be divided into three groups: 1) Standard plan formats for larger PHAs and PHAs designated as troubled, 2) Streamlined plans for small PHAs with less than 250 public housing units and any number of vouchers when combined is greater than 550 units (non-HERA eligible), and 3) Qualified PHAs with 550 or fewer public housing units and vouchers combined.

Standard and Troubled PHAs will complete and submit the 5-Year PHA Plan template (50075-5Y) and submit it every five years unless there are any interim changes to the goals, objectives, and policies of the PHA. Standard and Troubled PHAs will complete the standard Annual PHA Plan template 50075-ST, which includes information on all annual plan components, but retains the feature of the previous template allowing PHAs to identify and submit information only on certain elements that have changed since the last annual plan submission and describe new activities planned for the coming year..

Small PHAs with less than 250 public housing units and any number of vouchers, which when combined exceeds 550 units (non-HERA qualified) will submit the streamlined annual plan template, 50075-SM-HP, which requires reporting of fewer annual plan elements when 5-year PHA Plans are also due, and permits PHAs to certify and describe which plan elements changed from the previous annual plan submission for all other submission years.

Section 8 or HCV Only PHAs that administer more than 550 vouchers will complete and submit the 5-Year PHA Plan template (50075-5Y) and submit it every five years unless there are any interim changes to the goals, objectives, and policies of the PHA. Section 8 or HCV Only PHAs complete the Annual PHA Plan template 50075-HCV, which includes submission of only those annual plan components that are applicable to administration of the Housing Choice Voucher program.

Qualified PHAs will complete the 5-Year PHA Plan template (50075-5Y) and submit it every five years unless there are any interim changes to the goals, objectives, and policies of the PHA. Qualified PHAs will also submit each year the Annual Requirements (50075-QA) template to confirm their qualified status and compliance with the civil rights and Resident Advisory Board (RAB) consultation requirements. Qualified PHAs no longer submit statements of capital improvements with their annual plans. That information is now submitted separately in conjunction with the administration of public housing funding under the Capital Fund Program.

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.

Collection of this information is mandated by statute. The majority of the information collected represents an abbreviated and comprehensive inventory of the policies PHAs employ in their management of public housing and Housing Choice Vouchers that are a routine part of the PHAs day-to-day operations.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to HUD more than quarterly;**
- **requiring respondents to prepare a written response to a collection of information fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any documents; or**
- **requiring respondents to retain records for more than three (3) years.**

None of the special circumstances above apply to this information collection. The currently proposed form HUD-50075 has been customized into separate versions for use by various types of PHAs – Qualified, high performing, small, standard, troubled, and Section 8 or HCV Only PHAs.Non-Qualified, and troubled.

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. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

This information collection was announced in the *Federal Register*, Volume 77, page 5524, on February 3, 2012. No comments were received.

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

No payment or gifts to respondents is involved.

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

The PHA plans submitted to HUD are public information and do not lend themselves to confidentiality.

11. Provide additional justification for any questions of a sensitive nature, such as 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 PHA plans are not of a sensitive nature.

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 for approval 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.**

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 burden, based on the number of respondents, frequency of response, and annual burden is summarized in the following table:

Form HUD-50075-ST	**Number of Respondents**	**Frequency of Responses**	**Estimated Annual Burden Hours Per Respondent**	**TOTAL Annual Burden Hours All Respondents**	**Total Responses**
SECTION A **PHA Information, Inventory, Submission Type**	71	1	0.06	4.26	71
SECTION A **PHA Consortia**	2	1	0.04	0.08	70
SECTION B **B.1 and B.2 Statement of Housing Needs and Strategy for Addressing Housing Needs**	71	1	2.6	184.6	71
B.3. Revision of PHA Plan Elements • Deconcentration Policy • Waiting List Procedures • Eligibility, Selection, Occupancy, Admissions • Unit Assignment Policies • Financial Resources • Rent Determination • Operation and Management • Grievance Procedures • Homeownership Programs • Self Sufficiency Programs • Community Service Programs • Safety and Crime Prevention • Violence Against Women Act • Pet Policy • Asset Management • Substantial Deviation • Significant Amendment/Modification	71	1	2	142	71
B.4 New Activities • Hope VI • Mixed-Finance • Demolition and Disposition • Designated Housing • Conversions • Occupancy by Over-Income Families • Occupancy by Police Officers • Non-Smoking Policies • Use of Project-Based Vouchers	71	1	2	142	71
B.5 Civil Rights Certification **Form HUD-50077**	71	1	0.1	7.1	71
B.6 Most Recent Fiscal Year Audit	71	1	0.5	35.5	71
B.7 Progress Report	71	1	0.5	35.5	71
B.8 Resident Advisory Board Comments	71	1	0.5	35.5	71
B.9 Form HUD-50077-SL ***Certification by State or Local Officials***	71	1	0.2	14.2	71
B.10 Troubled PHA **Memorandum of Agreement**	45	1	0.5	22.5	71
SECTION C. Capital Improvements **Form HUD-50075.1** ***CFP Annual Statement and Performance and Evaluation***	71	1	8	568	71
Form HUD-50075.2 ***CFP 5-Year Action Plan***	71	1	4	284	71
Form HUD-50077 ***PHA Certification of Compliance with PHA Plans and Related Regulations***	71	1	0.2	14.2	71
Form HUD-50071 ***Certification of Payments to Influence Federal Transactions***	71	1	0.2	14.2	71
SF-LLL and SF-LLL-A ***Disclosure of Lobbying Activities and Continuation Sheet***	71	1	0.2	14.2	71
50075-ST Annual Plan Total Burden Hours	71	1	21.6	1517.84	71
Form HUD-50075-SM-HP	**Number of**	**Frequenc**	**Estimated**	**TOTAL Burden**	**Total**

Submitted with 5-Year Plan	Responden ts	y of Response s	Annual Burden Hours Per Respondent	Hours All Respondents	Respons es
SECTION A **PHA Information, Inventory, Submission Type**	740	1	0.06	44.4	740
SECTION A - PHA Consortia	2	1	0.04	0.08	70
SECTION B - B.1. and B.2. Statement of Housing Needs and Strategy for Addressing Housing Needs	740	1	2.6	1924	740
B.3. Revision of PHA Plan Elements • Deconcentration Policy, Waiting List Procedures, Eligibility, Selection, Occupancy, Admissions, Unit Assignment Policies • Financial Resources • Rent Determination • Homeownership Programs • Substantial Deviation • Significant Amendment/Modification	740	1	2	1480	740
B.4 New Activities • Hope VI • Mixed-Finance • Demolition and Disposition • Conversions of Public Housing • Project-Based Vouchers	740	1	2	1480	740
B.3. Progress Report	740	1	0.5	370	740
SECTION D - Other Documents Required for ALL Annual Plan Submissions **D.1. Civil Rights and Other Certifications Form HUD-50077, *Certification of Compliance with PHA Plans and Related Regulations***	740	1	0.2	148	740
D.2. Form HUD-50077-SL, *Certification by State or Local Officials*,	740	1	0.2	148	740
SECTION E - Capital Improvements Form HUD 50075.1, *CFP Annual Statement, Performance and Evaluation*	740	1	8	5920	740
Form HUD 50075.2, *CFP 5-Year Action Plan*	740	1	4	2960	740
50071 *Certification of Payments to Influence Federal Transactions*	740	1	0.2	148	740
SF-LLL and SF-LLL-A *Disclosure of Lobbying Activities and Continuation Sheet*	740	1	0.2	148	740
50075-SM-HP Annual Plan in 5th Year TOTAL BURDEN HOURS			20	14770.48	
Form HUD-50075-SM-HP Submitted in Years 1-4	**Number of Responden ts**	**Frequenc y of Response s**	**Estimated Annual Burden Hours Per Respondent**	**TOTAL Burden Hours All Respondents**	**Total Respons es**
SECTION C - Annual Plan Elements Submitted in Years 1-4 **C.1. New Activities** • Hope VI • Mixed-Finance • Demolition and Disposition • Conversions of Public Housing • Project-Based Vouchers	740	1	2	1480	740
C.2. Certification Listing Policies and Programs Revised Since Last Annual Plan Submission • Housing Needs • Deconcentration Policy, Waiting List Procedures, Eligibility, Selection, Occupancy, Admissions, Unit Assignment Policies • Financial Resources • Rent Determination • Homeownership Programs • Substantial Deviation (5-year plan) • Progress in meeting 5-year goals • Significant Amendment/Modification • RAB Comments and PHA Analysis	740	1	1	740	740

SECTION D - Other Documents Required for ALL Annual Plan Submissions **D.1. Civil Rights and Other Certifications Form HUD-50077, *Certification of Compliance with PHA Plans and Related Regulations***	**740**	**1**	**0.2**	**148**	**740**
D.2. Form HUD-50077-SL, *Certification by State or Local Officials,*	**740**	**1**	**0.2**	**148**	**740**
SECTION E - Capital Improvements Form HUD 50075.1, *CFP Annual Statement, Performance and Evaluation*	**740**	**1**	**8**	**5920**	**740**
Form HUD 50075.2, *CFP 5-Year Action Plan*	**740**	**1**	**4**	**2960**	**740**
50071 *Certification of Payments to Influence Federal Transactions*	**740**	**1**	**0.2**	**148**	**740**
SF-LLL and SF-LLL-A *Disclosure of Lobbying Activities and Continuation Sheet*	**740**	**1**	**0.2**	**148**	**740**
50075-SM-HP Annual Plan in Years 1-4 TOTAL BURDEN HOURS			**15.8**	**11,692**	
Form 50075-SM-HP Annual Plan All Years TOTAL BURDEN HOURS			**16.64**	**12,307.70**	
Form HUD-50075-HCV	**Number of Respondents**	**Frequency**	**Estimated Annual Burden Hours Per Respondent-**	**TOTAL Burden Hours All Respondents**	**Total Responses**
SECTION A - PHA Information, Inventory Submission Type	**248**	**1**	**0.06**	**14.88**	**248**
SECTION A - PHA Consortia	**2**	**1**	**0.04**	**0.08**	**70**
SECTION B - Annual Plan **B.1. Revision of PHA Plan Elements** • **Waiting List Procedures, and Eligibility, Selection, Occupancy, and Admissions** • **Financial Resources** • **Rent Determination** • **Operation and Management** • **Informal Reviews and Hearings** • **Homeownership Programs** • **Self Sufficiency Programs** • **Treatment of Income Changes Resulting from Welfare Program Requirements** • **Substantial Deviation** • **Significant Amendment/Modification**	**248**	**1**	**2.5**	**620**	**248**
B.2. Most Recent Fiscal Year Audit	**248**	**1**	**0.5**	**124**	**248**
B.3 Civil Rights Certification Form HUD-50077, *Certification of Compliance with PHA Plans and Related Regulations*	**248**	**1**	**0.2**	**49.6**	**248**
B.4 Form HUD-50077-SL *Certification by State or Local Officials of PHA Plan Consistency with Consolidated Plan*	**248**	**1**	**0.2**	**49.6**	**248**
B.5 Progress Report	**248**	**1**	**0.5**	**124**	**248**
B.6 RAB Comments (24 CFR 903.13 b(3)) Where tenant-based assistance is 20% or more of assisted families	**248**	**1**	**0.5**	**124**	**248**
50075-HCVAnnual Plan TOTAL BURDEN HOURS			**4.5**	**1108.88**	
Form HUD-50075-QA	**Number of Respondents**	**Frequency**	**Estimated Annual Burden Hours Per Respondent-**	**TOTAL Burden Hours All Respondents**	**Total Responses**
SECTION A - PHA Information, Inventory Submission Type	**2994**	**1**	**0.06**	**179.64**	**2994**
SECTION A - PHA Consortia	**2**	**1**	**0.04**	**0.08**	**2**
SECTION B - Annual Requirement **B.1 Civil Rights Certification Form HUD-50077, *Certification of Compliance with PHA Plans and Related Regulations***	**2994**	**1**	**0.2**	**598.8**	**2994**
B.3 Public and RAB Comments Where tenant-based assistance is 20% or	**2994**	**1**	**0.5**	**1497**	**2994**

more of assisted families					
50075-QA Annual Plan TOTAL BURDEN HOURS	2994	1	0.8	2275.52	2994
Form HUD-50075-5Y	**Number of Respondents**	**Frequency of Responses**	**Estimated Annual Burden Hours Per Respondent**	**TOTAL Burden Hours All Respondents**	**Total Responses**
SECTION A - PHA Information, Inventory Submission Type	4053	1	0.06	243.18	4053
SECTION A - PHA Consortia	8	1	0.04	0.32	8
SECTION B Mission, Goals and Objectives, Progress Report, and Violence Against Women Act	4053	1	3.5	14185.5	4053
Form HUD - 50077-SL *Certification by State or Local Officials of Consistency with Consolidated Plan*	4053	1	0.2	810.6	4053
5-Year Plan - TOTAL BURDEN HOURS	4053	1	3.8	15401.4	4053
5-Year Plan - TOTAL ANNUAL BURDEN HOURS BURDEN HOURS/5	4053	1	.76	3080.28	4053
TOTAL ANNUAL BURDEN HOURS ALL FORMS and AVG. ANNUAL BURDEN HOURS EACH PHA	4053	1	5.01	20,290.22	4053

Total Annual Burden Hours for all PHAs for all PHA Plan Templates: 20,290.22
Calculation of Total Annual Burden Hours: Sum of Annual Plan burden hours for all PHA Plan templates + Average Annual Burden Hours for 5-Year PHA Plan (Total burden hours divided by five-year covered period.
Average Annual Burden Hours all PHAs: 5.01 (Total annual burden hours for all forms divided by the total number of respondent PHAs)

Burden hour estimates are based on a total of 4,053 PHAs - (2,994 Qualified PHAs, 71 Standard or Troubled PHAs with more than 550 public housing units or vouchers combined, 740 High Performers and Small PHAs with less than 250 public housing units and any number of vouchers that when combined exceeds 550 total units, and 248 Section 8 Only PHAs with more than 550 vouchers or with less than 551 vouchers but SEMAP-Troubled. This data was extracted from HUD's PIC Data Page on 12-16-2011. The 5-Year Plan is completed once every 5 years by all PHAs.

The burden hours reflected in the Burden Worksheet and Supporting Statement represent the average annual burden hours for PHAs to prepare and submit Annual and 5-Year PHA Plan templates, CFP forms, and additional certifications and documents as attachments to the PHA Plan based on such factors as the size and designation of the PHA, and the number of programs administered by the PHA. 5-Year PHA Plans and related certifications and documents only, and (19,007.1 hours) for Non-Qualified PHAs to complete the Qualified PHAs under HERA submit a template documenting their annual requirements each year and the 5-Year PHA Plan once every 5 years. All other PHAs submit the applicable Annual PHA Plan each year, and the 5-Year Plan every 5 years, unless significant interim changes are made, in which case the 5-Year Plan may be submitted with the Annual Plan in the year in which the changes are made.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

There is no additional cost to respondents or recordkeeping for collection of this information for the elements: (a) total capital and start-up cost; and (b) total operation and maintenance and purchase of services. Respondents' costs were covered under the OMB approval for the standard PHA Plan at the time it was originally implemented in 1998. No proposed costs are associated with submission of a further streamlined PHA 5-Year/Annual Plan submission.

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

The cost to the Federal Government is for a contract of approximately $225,000 for 2,340 hours to manually convert submitted Plans into a uniform readable format, post them to the internal HUD website for HUD field office review, and then post approved Plans on the HUD website for public knowledge. Since the inception of HERA, the PHA Plan submittals have been reduced to approximately 50%, even during peak submission periods. Based upon this reduction, the level of effort to process these plans also reduces to 50%, in manpower and cost from the prior year contract value ($450,000). HUD nonetheless, is proceeding with plans to migrate the PHA Plans process as a fully automated Internet based system via PIH's IMS or SAGIS systems. The proposed date and system is still undetermined due to Departmental priorities of other planned integrated systems.

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

The current PHA Plan template approved in 2008 applies to all PHAs regardless of size or performance status. This proposed revision to the 5-Year and Annual Plan templates significantly reduces the burden for Qualified PHAs with 550 or fewer public housing units and/or Housing Choice Vouchers, by eliminating the requirement to prepare and submit an Annual PHA Plan. In the previous revision to this information collection, which is currently approved, it was stated that the format of the PHA Plan template submitted to HUD did not eliminate any information on programs and policies that PHAs are required by statute or regulation to maintain. PHAs were still required to make all required 5-Year and Annual PHA Plan elements available to the public consistent with both the statute and the regulations. With the implementation of HERA and this proposed revision to the collection Qualified PHAs no longer have to update Annual PHA Plan elements or make them available to the public. HERA states that with its passage, any law that makes reference to the requirement for a PHA to prepare or submit an Annual PHA Plan does not refer to Qualified PHAs. The submission for the Capital Fund Program is changed for Qualified PHAs, who no longer have to submit the CFP-related forms with an Annual PHA Plan, since they no longer have to prepare or submit an Annual PHA Plan. For Non-Qualified PHAs the CFP information requirements remain unchanged. PHAs will continue to use form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report*, for the following purposes: 1) to submit the initial budget for a new grant; 2) to report progress on any open grant previously funded; and 3) to record a budget revision on previously approved open grants. The form HUD-50075.2, *Five-Year Action Plan*, must be completed at least once every five years for all proposed work. Qualified PHAs are not required to submit forms HUD-50075.1 or HUD-50075.2 with an Annual PHA Plan, but are required to submit or maintain this information under a separate Capital Fund Program process.

With this revision to the PHA Plan information collection, HUD seeks to implement the HERA requirements and respond to public comments on the 2008 version of the PHA Plan form by creating separate versions of the Annual PHA Plan form HUD-50075 specifically tailored for standard, troubled, small, high performing, and Section 8 Only PHAs. The new forms include the following features:

- Incorporates the VAWA requirements
- Includes separate and customized Civil Rights Certifications for Qualified PHAs, Small and High Performing PHAs, and All Other PHAs.
- Includes an update to the 50077,SL, *Consistency with Consolidated Plan certifications* to include a description of how the PHA Plan is consistent with the local jurisdiction's Consolidated Plan and for use byQualified PHAs and all other PHAs.
- Creates a new form HUD-50075-QA for HERA qualified PHAs to reflect only their annual requirements for conducting public hearings, consulting with Resident Advisory Boards, and certifying civil rights compliance.
- Reflect the reduced burden to Qualified PHAs by removing them from respondents required to prepare and submit Annual PHA Plans
- The new Annual PHA Plan forms (HUD-50075-ST, 50075-SM-HP, 50075-HCV, and 50075-QA):
    - Add a new section to describe activities for implementing the Violence Against Women Act; 3)
    - Add a new requirement to update PHA Plans if PHAs opt to implement non-smoking policies in public housing under the Annual Plan component for Management and Operations;
    - Incorporate a table identifying all Annual PHA Plan elements;
    - A new section for the Annual Plan component for Deconcentration in Admissions Policy;
    - Add a new requirement under the Annual Plan component for providing Additional Information to HUD referencing any performance improvement plan or Memorandum of Agreement between HUD and Troubled or Standard performance PHAs;
    - Modify the list of Required Documents to add forms HUD-50077-CR and HUD-50077-SL and Admissions policies for deconcentration of lower-income families;
    - Identify the required submission documents for Qualified PHAs separately;
    - Include minor edits to the Instructions page of form HUD-50075;
    - and renumber other sections of the form.

- Form HUD 50077-CR remains unchanged with one exception:
    - Deletes from paragraph 1, line 2, "if there is no board of commissioner".

- Form HUD-50077 remains unchanged with one exception:
    - Deletes item 3, "The PHA certifies that there has been no change, significant or otherwise, to the Capital Fund Program (and Capital Fund Program/Replacement Housing Factor) Annual Statement(s), since

submission of its last approved Annual Plan. The Capital Fund Program Annual Statement/Annual Statement/Performance and Evaluation Report must be submitted annually even if there is no change." Form redesignates items (4), (5), (6), (7), (8), (9), (10), (11), (12), (13), (14), (15), (16), (17), (18), (19), (20), (21), and (22), as (3), (4), (5), (6), (7), (8), (9), (10), (11), (12), (13), (14), (15), (16), (17), (18), (19), (20), and (21), respectively.

The burden hours in this collection represent the average number of hours for Qualified PHAs to prepare and submit 5-Year PHA Plans and related certifications and documents only, and all other PHAs to complete the applicable Annual PHA Plan template and 5-Year PHA Plan from applicable to all PHAs, the CFP forms as applicable, and additional certifications and documents as attachments to the PHA Plan based on such factors as the size and designation of the PHA, and number of programs administered by the PHA.

PHAs that are in Troubled performance status will not be considered Qualified PHAs and will be required to submit Annual and 5-Year PHA Plans. Qualified non-troubled PHAs with 550 or fewer units are exempt under HERA from the requirement to prepare and submit Annual PHA Plans and need only submit 5-Year PHA Plans describing their mission, goals, and objectives to serve the housing needs of low income families. Qualified PHAs no longer submit Capital Fund Program (CFP) forms HUD-50075.1, Annual Statement/Performance and Evaluation Reports or CFP Five-Year Action Plans (form HUD 50075.2) with submission of their Annual PHA Plans. They are still required to submit or maintain the 50075.1 and/or 50075.2 CFP forms or information under a separate CFP process and under authority of CFP statutes. The latest CFP requirements for Qualified and other PHAs are set forth in PIH-Notice 2011-24.

16. For collections 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.

N/A.

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.

The expiration date will be displayed on the collection instrument.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

No exceptions.

B. Collections of Information Employing Statistical Methods

This collection of information will not be used for statistical purposes.