Supporting Statement for Paperwork Reduction Act Submissions Supplement to Application for Federally Assisted Applications 2502-0581

A. Justification

- 1. <u>Explain circumstances that make the collection necessary</u>. Section 644 of the Housing and Community Development Act of 1992 (42 U.S.C. 13604) (Section 644) imposed on HUD the obligation to require housing providers participating in HUD's assisted housing programs to provide any individual or family applying for occupancy in HUD-assisted housing with the option, to include in the application for occupancy the name, address, telephone number, and other relevant information of a family member, friend, or person associated with a social, health, advocacy, or similar organization.
- 2. <u>Purpose of the information collection</u>. Housing providers must offer, as part of their application package for assisted housing, the opportunity for applicants to complete HUD-Form 92006, Supplement to Application for Federally Assisted Housing. If the applicant chooses to provide the contact information requested on the form, and if the applicant becomes a tenant, the information will be used by the housing provider to facilitate contact by the housing provider with the person or organization identified by the tenant, to assist in providing any delivery of services or special care to the tenant and assist with resolving any tenancy issues arising during the tenancy of such tenant. This supplemental application information is to be maintained by the housing provider and maintained as confidential information.
- 3. <u>Describe if the collection involves the use of automated, electronic or other technological collection techniques</u>. The proposed form is simply designed to accompany an application for housing provided by a housing provider that is covered by Section 644, and can be adapted to an electronic application if the housing provider provides for an application for housing to be completed and submitted electronically.
- 4. <u>Describe efforts to identify duplication</u>. While this statutory requirement to notify applicants for occupancy in HUDassisted housing of the option of providing such information is a long-standing one, HUD discovered that applicants were not being consistently notified of the option to provide this information. Accordingly, HUD determined that the best way to ensure that HUD-assisted housing providers comply with this requirement is to require compliance through utilization of a standard form. Housing providers give to each applicant for occupancy a form that notifies the applicant of his or her option to provide the information specified in section 644.
- 5. <u>Impact on small businesses</u>. There is no significant impact on small businesses.
- 6. <u>Consequences of noncompliance</u>. The individual applicant does not have to provide the information specified by Section 644. The housing provider, however, must provide the applicant with the option of providing such information. Failure to provide the applicant with the option to provide such information is a violation of Section 644.
- 7. <u>Explain circumstances that would require information to be reported more frequently or to submit more than one copy, and recordkeeping responsibilities</u>. The only circumstance which may result (not require) the information to be submitted by the applicant more frequently is if the applicant needs to change or update the application that the applicant may have provided to the housing provider at the time of application. There is no requirement for completion of more than one copy. If the applicant becomes a tenant, the housing provider must maintain the information provided by the tenant for the period of time in which the tenant is housed by the housing provider. Because the form includes addresses and phone numbers and possibly email addresses, the form contains a confidientality statement.
- 8. <u>Publication in Federal Register</u>. In accordance with 5 CFR 1320.8(d), this information collection soliciting public comments was announced in the *Federal Register* on January 22, 2009, (Volume 74, Number 13, Page 4048-4050). ... comments were received. Below is the chart of sample properties used for this update.

Alpha Terrace Apts	Dolan manor	Creekside manor	Chimney Hill	Issaquah Gardens
St. Louis, MO	Greensboro, NC	Clearwater, FL	Cumberland, RI	Issaquah, WA
Janice McCoy	Vicky Smith	Mariam Waterman	Kathy Paux	Sandy Beckman
(314)862-5668	(336)379-1411	(727)441-8400	(401)333-0211	(425)557-5842

- 9. <u>Description of any payment or gifts</u>. There are no payments or gifts to respondents.
- 10. <u>Assurance of confidentiality</u>. Section 644(a) of the 1992 Housing and Community Development Act requires that the owner treat information received from the applicant as confidential. Since the form HUD-92066, Supplement to Application for Federally Assisted Housing, is included as part of the housing provider's application package, any information provided by the applicant on the form must be protected under the requirements of the Privacy Act at 24 CFR 16.1, the same as all other information provided by the applicant on the housing provider's application form.

Because the form includes addresses and phone numbers and possibly email addresses, the form contains a confidientality statement.

11. <u>Information of a sensitive nature</u>. There is no information of a sensitive nature being requested. No social security numbers, employee identification numbers, date of birth or similar information is requested or obtained.

Information to be collected is supplemental and optional contact information under the following programs	Number of Responde nts *	Number of Responses Per Respondent	Estimated Average Time for Requirement (in Hours)	Estimated Annual Burden (in Hours)
Public Housing	65,277	1	.25	16,319.25
Tenant-Based Rental Vouchers	124,672	1	.25	31,168.00
Section 202 Project Rental Assistance Contracts (PRAC)	11,782	1	.25	2,945.50
Section 811 Project Rental Assistance Contracts (PRAC)	3,938	1	.25	984.50
Section 202/162 Project Assistance Contract (PAC)	130	1	.25	32.50
Section 8 Project-Based	152,400	1	.25	38,100.00
Section 236	4,952	1	.25	1,238.00
Section 221(d)(3) Below Market Interest Rate (BMIR)	329	1	.25	82.25
Rent Supplement	548	1	.25	137.00
Rental Assistance Payment (RAP)	754	1	.25	188.50
Totals	364,782			91,195.50

12. <u>Estimated burden hours</u>. Estimated number of respondents, responses and burden hours.

The number of respondents is the estimated number of total new admissions in the covered programs, and therefore the total of potential respondents. However, not all new admitted individuals and families may choose to complete Supplemental and Optional Contact Information for HUD-Assisted Housing Occupants. After sampling programs nationwide, including the East Coast, West Coast, Southern and Middle-America states, we have found that <u>66%</u> of newly admitted individuals and families chose to complete the form, which is represented above (364,782).

13. <u>Annual cost burden to respondents or recordkeepers</u>. This form is not completed on an annual basis, and is optional for each applicant/resident. Data indicates a cost of 91,195.50 on average. The annual estimate of the public burden to collect contact information that consists of either an individual or an organization (particularly those individuals who may have some form of mental or physical disability at the time of adminission) is estimated at approximately \$27,431.00 per applicant. This cost is based on the hourly rate of a GS-5, Step 1, which is \$13.19. While an hour is not anticipated to

collect the information, the cost includes the applicant/resident requesting to complete or update the form, and the housing provider's need to ensure that the contact information is completed/updated and retained in the resident's file.

- 14. <u>Annualized costs to the Federal government</u>. There are no costs to the government for generating or printing this form.
- 15. <u>Explain reasons for program changes or adjustments</u>. There is no change in program requirement, the statutory requirement is a long-standing one. HUD made the determination to ensure compliance with Section 644 through utilization of a standard form that requires housing providers to give to each applicant for occupancy a form that notifies the applicant of his or her option to provide the information specified in section 644, and provides for the submission of the information. Initially when the form was first distributed, all households were contacted and provided with a copy of the form to complete at their option. Now going forward, owner/agents will only give new admissions the form. So there would be a decrease overall, after the first round of forms were completed.
- 16. <u>Publication of results of information collection</u>. The results of the information collection will not be published.
- 17. <u>Display of expiration date of OMB approval</u>. HUD is not seeking exemption from the display date for OMB approval and the expiration date.
- 18. <u>Exceptions to certification statement</u>. There are no other exceptions to the certification statement identified in item 19 of the OMB 83-I.

B. Collections of Information Employing Statistical Methods

The collection of information does not employ statistical methods.