
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

Rental Assistance Demonstration Supporting Statement for Paperwork Reduction Act Submission Office of Public and Indian Housing, Office of Housing-Federal Housing Commissioner

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.**

The Department of Housing and Urban Development's (HUD) 2012 Appropriations Bill¹ authorized the **Rental Assistance Demonstration (RAD)**. The Demonstration allows Public Housing and Moderate Rehabilitation (Mod Rehab) properties to convert to long-term Section 8 rental assistance contracts; and Rent Supplement (Rent Supp), Rental Assistance Payment (RAP), and Mod Rehab properties, upon contract expiration or termination, to convert tenant protection vouchers (TPVs) to project-based vouchers (PBVs). Participation in the initiative will be voluntary. HUD intends, through the conversion process, to assure the physical and financial sustainability of properties and enable owners to leverage private financing to address immediate and long-term capital needs, improve operations, and implement energy efficiency improvements.

The information collection contained herein supports two activities: first, it includes the related contract documents that awardees will sign as part of the conversion process and, second, it includes the associated program submission requirements for certain awardees prior to the moment of conversion.

Additional Background

There are two components to the RAD Demonstration, influencing the collection requirements. Under the first component, PHAs and Mod Rehab owners may compete for conversion to long-term section 8, limited to 60,000 units. Under the second component, owners of Mod Rehab, as well as owners of Rent Supplement and Rental Assistance projects, may, at contract expiration or termination, convert tenant protection vouchers to project-based vouchers. Unique contractual and processing requirements are associated with each component and for each pre-conversion program type.

The contractual documents included under this collection include:

First Component:

- Housing Assistance Payments (HAP) Contract for Conversion of Public Housing to PBRA Parts I & I
- Housing Assistance Payments (HAP) Contract Rider for Conversion of Public Housing to PBVs
- Housing Assistance Payments (HAP) Contract for Conversion of Mod Rehab to PBRA Parts I & II
- Housing Assistance Payments (HAP) Contract Rider for Conversion of Mod Rehab to PBV – Existing Housing

¹ Public Law 112-55-Consolidated and Further Continuing Appropriations Act, 2012. Signed November 18, 2011

- Housing Assistance Payments (HAP) Contract Rider for Conversion of Mod Rehab to PBV – New Construction
- Use Agreement for Public Housing Conversions
- RAD Conversion Commitment (Public Housing and Mod Rehab)
- Agreement to Enter Into Housing Assistance Payments Contract (AHAP) Contract Rider for Mod Rehab, Rent Supp and RAP Conversions to PBV²

Second Component

- Housing Assistance Payments (HAP) Contract Rider for Mod Rehab, Rent Supp and RAP Conversions to PBV – Existing Housing
- Housing Assistance Payments (HAP) Contract Rider for Mod Rehab, Rent Supp, and RAP – New Construction

The RAD Conversion Commitment (RCC) is a contract executed by HUD and a converting public housing agency or owner, following HUD approval of the financing plan and any necessary milestones. The RCC describes the key components of the planned RAD conversion and will inform the applicant of the conditions that must be satisfied in order to complete the conversion. The RAD Use Agreement, which is used for public housing project conversions under the first component, sets out affordability and use restrictions for converted projects. The RAD Use Agreement will be a recorded lien on the converting property and will ensure the long-term preservation and affordability of converted projects, in furtherance of the statutory intent of HUD’s 2012 Appropriations Bill. The different RAD Housing Assistance Payments (HAP) Contracts and the Agreement to Enter into a Housing Assistance Payment (AHAP) Contract set forth the rights and duties of the applicant and HUD with respect to the converted project and any payments under that project. The RAD Web Portal, the RAD Financing Plan, and the Accessibility and Relocation Plan Worksheet (Part of the Financing Plan Submission) are for Public Housing and Mod Rehab conversions under both components and are necessary for the submission of supplementary information to process and complete the conversion process.

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 HAP contracts, Use Agreement, and RCC are essential legal documents required to implement the program in accordance with program and statutory rules. Similarly, the program submission documents, including the RAD Financing Plan are essential for on-going processing and monitoring of program objectives.

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.

² Please be aware, this contractual document applies to Mod Rehab under both the first and second component, as well as Rent Supp and RAP under the second component.

To minimize the public reporting burden, HUD is setting up a RAD Web Portal in order to allow for the online electronic collection of documentation that would otherwise have been submitted in hard copy. Examples of this information include the following:

- Evidence that a Physical Condition Assessment has been performed for the converting property;
- Evidence of a completed environmental review for the converting property; and
- Description of the development team that will own and manage the rehabilitation or construction for the converting property.

Additionally, RAD will be using information submitted under the RAD Application to pre-populate the development budget and operating pro forma components of the Web Portal. Applicants will still be required to update the development budget and operating pro forma and therefore those components are programmed to conduct mathematical computations as needed. Lastly, once completed, the applications automatically feed relevant information to additional required forms (where applicable); examples of these forms include:

- The RCC;
- The RAD HAP Contracts; and
- Riders to existing HAP Contracts.

The Web Portal will be accessed and submitted through the RAD website. The

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 is no duplication of reporting. The covered collection activities are not available elsewhere.

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 information collection has no impact on small businesses or other small entities.

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.

Public Housing Authorities and project owners interested in participating in the Demonstration and who have had their applications approved are required to submit this information to HUD. Failure to collect this information in the timeframes indicated would impede the Department's ability to determine continued eligibility for participation in RAD and would impair HUD's ability to enter into binding contractual relations to effectuate the successful conversion of units under the Demonstration.

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 often than quarterly;**

Using the Web Portal, accepted applicants to the RAD program will be required to upload information regarding feasibility milestones that are to be completed within the timeframes specified in the Notice and their individual award letters. Since completion of conversions is only granted if the project is feasible, applicants will need to access the portal to provide that information to demonstrate to the Department that the project is capable of converting by submitting the appropriate information in the given timeframes. Information collected by the Web Portal is only ongoing prior to conversion and will not require more often than quarterly reporting following completion of the conversion process.

*** Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

None

*** Requiring respondents to submit more than an original and two copies of any document;**

None

*** Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**

None

*** In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**

None

*** Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

None

***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**

None

*** Requiring respondents to submit proprietary trade secrets, 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.**

None

- 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.**

This information collection was announced for its 60 day review in the *Federal Register*, Volume 77; Page 49004 on August 15, 2012. No comments were received. This information request published for its 30 day review in the *Federal Register*, Volume 77; Page 64822 on October 23, 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 gift will be granted to the respondents.

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

Assurance of confidentiality is neither provided nor needed for this information collection.

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.

No sensitive information is being asked by this collection.

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 1.**

The number of respondents for the forms listed below and reflected in the chart below indicates the amount of *potential* respondents. Individual forms must be submitted for each project that the applicant is seeking to convert under RAD. There are currently approximately 7,500 projects in the Public Housing inventory that could apply for RAD. Similarly, there are 1,355 existing MOD Rehab expiring contracts that could apply to participate in RAD. HUD believes that based upon the median amount of units in a Public Housing Project (100 units), there will be 588 selected Public Housing projects for the demonstration. This is based upon the authorization of 60,000 units given by the HUD 2012 Appropriations Bill and reduced to the 58,7500 reserved for Public Housing Projects under the Notice. Of those 588 selected Public Housing projects, HUD expects that half of all projects (294) will choose to convert to PBV units, requiring a PBV HAP Contract Rider for Public Housing conversions; and that half of all projects (294) will convert to PBRA units, requiring a PBRA HAP Contract for Public Housing conversions. All 588 selected Public Housing projects will be required to sign a RAD Use Agreement.

Additionally, under the first component the Department anticipates that 1,250 units will be converted from Mod Rehab into either PBV or PBRA units. Taking the median amount of units in a Mod Rehab project (75 units), HUD anticipates that there will be 17 projects that will convert under this first component. Of those 17 projects, HUD anticipates that a little more than half (9) will convert to PBRA, requiring a PBRA HAP Contract for Mod Rehab conversions; and that the remaining projects (8) will convert to PBVs. PBV conversions for Mod Rehab have multiple contracts that may apply to them, based upon the need for rehabilitation. The Department believes that half of all Mod Rehab projects converting to PBVs (4) will require rehabilitation therefore necessitating use of both an RAD AHAP Rider and a Rehabilitation Housing HAP Contract Rider; the remaining Mod Rehab projects (4) will require only an

Existing Housing HAP Contract Rider. All projects converting under the first component (605) of the HUD 2012 Appropriations Bill RAD authorization language must sign a RCC, as required by the statute, as well as provide required information into the Web Portal. Along with using the web portal, applicants will be required to fill out a financing plan to determine final viability of the project and compliance with applicable fair housing requirements. The financing plan should have 605 respondents from the first component.

Under the second component, HUD will be accepting applications from Mod Rehab, Rent Supp and RAP projects. Unlike the first component, the second component has a different set of statutory requirements necessitating a different set of contractual documents. Additionally, there is no limitation on the amount of Mod Rehab, Rent Supp and RAP projects that can apply for conversion. HUD anticipates that of the overall Mod Rehab, Rent Supp and RAP program portfolio, 10% (5,000 units) will convert under RAD. HUD determined that 10% will apply because there are funding constraints attached to the Tenant Protection Voucher (TPV) funding necessary to convert under the second component. Once again, the Department used the median amount of units in a Mod Rehab, Rent Supp and RAP projects to determine that 66 projects will convert to PBVs. HUD further determined that half (33) of all Mod Rehab, Rent Supp and RAP units converting under the second component will require rehabilitation, necessitating both a RAD AHAP Rider and a Rehabilitation Housing HAP Contract Rider (second component rider); the remainder (33) shall only require an Existing Housing HAP Contract Rider (second component rider). Finally, all Mod Rehab projects under the second component will be required to fill out a RAD Financing Plan for Mod Rehab on a HUD-provided template (33). Both Financing Plans have been made the same and so the total amount of respondents is now 638.

Type of Reporting	Respondents	Annual Responses	Total Responses	Burden Hours per Response	Total Burden Hours	Salary (per hour)	Total Burden Cost
PBV HAP Contract Rider – Public Housing Conversions	294	1	294	1	294	\$40	\$11,760
PBRA HAP Contract – Public Housing Conversions Parts I & II	294	1	294	1	294	\$40	\$11,760
RAD Use Agreement	588	1	588	1	588	\$40	\$23,520
PBRA HAP Contract – Mod Rehab Conversions Parts I & II	9	1	9	1	9	\$40	\$360
PBV Existing Housing HAP Contract Rider – Mod Rehab under 1st component	4	1	4	1	4	\$40	\$160
PBV Rehabilitation Housing HAP Contract Rider – Mod Rehab under 1st component	4	1	4	1	4	\$40	\$160
RCC	605	1	605	1	605	\$40	\$24,200
RAD Web Portal	605	9	5,445	1	5,445	\$40	\$217,800
PBRA Rehabilitation Housing HAP Contract Rider – Mod Rehab, Rent Supp and RAP (second component rider)	33	1	33	1	33	\$40	\$1,320
PBRA Existing Housing Contract Rider – Mod Rehab, Rent Supp and RAP (second component rider)	33	1	33	1	33	\$40	\$1,320
PBV AHAP Contract Rider	37	1	37	1	37	\$40	\$1,480

Financing Plan (first and second component including Accessibility and Relocation Plan Checklist)	638	1	638	3	1,914	\$40	\$76,560
Total	3,144		7,984		9,260	\$40	\$346,200

13. Provide an estimate for 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).

There are no start-up or additional costs to the respondents other than those reported in Item 12 above in the Burden Cost Column. The GS-14-1 wage was used for this collection, at \$40 per hour.

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 expense 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.

There will be no additional costs to the federal government for this information collection. However, provided below is an analysis of the costs for review and approval of documents within this collection for purposes of transparency in the internal costs borne onto HUD.

The number of respondents for the forms listed below and reflected in the chart below indicates the amount of *anticipated* respondents. Individual forms must be submitted for each project that the applicant is seeking to convert under RAD. There are currently approximately 7,500 projects in the Public Housing inventory that could apply for RAD. Similarly, there are 1,355 existing MOD Rehab expiring contracts that could apply to participate in RAD. HUD believes that based upon the median amount of units in a Public Housing Project (100 units), there will be 588 selected Public Housing projects for the demonstration. This is based upon the authorization of 60,000 units given by the HUD 2012 Appropriations Bill and reduced to the 58,7500 reserved for Public Housing Projects under the Notice. Of those 588 selected Public Housing projects, HUD expects that half of all projects (294) will choose to convert to PBV units, requiring a PBV HAP Contract Rider for Public Housing conversions; and that half of all projects (294) will convert to PBRA units, requiring a PBRA HAP Contract for Public Housing conversions. HUD anticipates that each of these forms will be used at the rate of one-third of the potential universe, as this Demonstration is over a three year application period. Therefore, HUD anticipates that the total burden to the government shall be 98 hours for each of the two contracts (PBRA Contract and PBV Contract Rider) for public housing conversions. All 588 selected Public Housing projects will be required to sign a RAD Use Agreement and one third of those projects are anticipated in each year giving a total government burden of 196 hours.

Additionally, under the first component the Department anticipates that 1,250 units will be converted from Mod Rehab into either PBV or PBRA units. Taking the median amount of units in a Mod Rehab project (75 units), HUD anticipates that there will be 17 projects that will convert under this first component. HUD currently anticipates all of those applications being processed in a single year and therefore is stating that HUD shall have the same government hours burden as anticipated. Of those 17 projects, HUD anticipates that a little more than half (9) will convert to PBRA, requiring a PBRA HAP Contract for Mod Rehab conversions; and that the remaining projects (8) will convert to PBVs. PBV conversions for Mod Rehab have multiple contracts that may apply to them, based upon the need for

rehabilitation. The Department believes that half of all Mod Rehab projects converting to PBVs (4) will require rehabilitation therefore necessitating use of both an RAD AHAP Rider and a Rehabilitation Housing HAP Contract Rider; the remaining Mod Rehab projects (4) will require only an Existing Housing HAP Contract Rider. All projects converting under the first component (605) of the HUD 2012 Appropriations Bill RAD authorization language must sign a RCC, as required by the statute, as well as provide required information into the Web Portal. HUD anticipates that all 17 Mod Rehab projects and one third of all potential public housing projects converting (196) will be using the Web Portal or signing a RCC in a given year and therefore the total governmental burden shall be 213, multiplied by 9 different review points that will require one hour each, giving a total governmental burden of 1,917 hours per year. Along with using the web portal, applicants will be required to fill out a financing plan to determine final viability of the project and compliance with applicable fair housing requirements. The financing plan should have 605 respondents from the first component and under the same logic as the above, will entail 213 financing plan reviews annually. Such reviews shall account for approximately 2 hours of governmental burden each, bringing the total government burden to work of government burden to 426 hours per year for processing the financing plans.

Under the second component, HUD will be accepting applications from Mod Rehab, Rent Supp and RAP projects. Unlike the first component, the second component has a different set of statutory requirements necessitating a different set of contractual documents. Additionally, there is no limitation on the amount of Mod Rehab, Rent Supp and RAP projects that can apply for conversion. HUD anticipates that of the overall Mod Rehab, Rent Supp and RAP program portfolio, 10% (5,000 units) will convert under RAD. HUD determined that 10% will apply because there are funding constraints attached to the Tenant Protection Voucher (TPV) funding necessary to convert under the second component. Once again, the Department used the median amount of units in a Mod Rehab, Rent Supp and RAP projects to determine that 66 projects will convert to PBVs. Just as in the above Mod Rehab discussion, HUD believes that each of these transactions will be of the same burden on an annual basis. HUD further determined that half (33) of all Mod Rehab, Rent Supp and RAP units converting under the second component will require rehabilitation, necessitating both a RAD AHAP Rider and a Rehabilitation Housing HAP Contract Rider (second component rider); the remainder (33) shall only require an Existing Housing HAP Contract Rider (second component rider). Finally, all Mod Rehab projects under the second component will be required to fill out a RAD Financing Plan for Mod Rehab on a HUD-provided template (33). Both Financing Plans have been made the same and so the total amount of respondents is now 638. Of the total amount of respondents, 33 are anticipated to be processed for Mod Rehab under the 2nd component annually, 17 Mod Rehab projects under the 1st component annually and 196 public housing projects annually for a total annual government burden of processing 246 financing plans at a rate of 2 hours of governmental burden for a new total of 492 burden hours.

Type of Reporting	Respondents	Annual Responses	Total Responses	Government Burden Hours per Response	Total Government Burden Hours	Government Salary (per hour)	Total Government Burden Cost
PBV HAP Contract Rider – Public Housing Conversions	98	1	98	1	98	\$40	\$3,920
PBRA HAP Contract – Public Housing Conversions Parts I & II	98	1	98	1	98	\$40	\$3,920
RAD Use Agreement	196	1	196	1	196	\$40	\$7840
PBRA HAP Contract – Mod Rehab Conversions Parts I & II	9	1	9	1	9	\$40	\$360
PBV Existing Housing HAP Contract Rider – Mod Rehab under 1st component	4	1	4	1	4	\$40	\$160

PBV Rehabilitation Housing HAP Contract Rider – Mod Rehab under 1st component	4	1	4	1	4	\$40	\$160
RCC	213	1	213	1	213	\$40	\$8,520
RAD Web Portal	213	9	1917	1	1917	\$40	\$76,680
PBRA Rehabilitation Housing HAP Contract Rider – Mod Rehab, Rent Supp and RAP (second component rider)	33	1	33	1	33	\$40	\$1,320
PBRA Existing Housing Contract Rider – Mod Rehab, Rent Supp and RAP (second component rider)	33	1	33	1	33	\$40	\$1,320
PBV AHAP Contract Rider	37	1	37	1	37	\$40	\$1,480
Financing Plan (first and second component including Accessibility and Relocation Plan Checklist)	246	1	246	2	492	\$40	\$19,680
Total	1151		2,888		3,134	\$40	\$125,360

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

The original PRA for this information collection was performed on an emergency basis for only those contractual instruments that were to be executed in the next four to six months. This package represents the true breadth of RAD’s information collection activities, including all contractual instruments not included in the emergency PRA, all data collection instruments, as well as the originally covered contractual instruments. No program changes have occurred to prompt these additional instruments, as it was always the intent of the Department to place the full set of instruments under cover of a PRA. The only change is one of timing; the emergency PRA only covered instruments that must be executed in the next four to six months, the full PRA covers instruments that might not be utilized for four months or more.

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.

Information collection results 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.

The OMB approval number and date will appear on the HUD-prescribed forms.

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

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

There are no collections of information that employ statistical methods.