
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 Senior Officer or Designee:

Date:

X
Colette Pollard, Departmental Reports Management Officer
Office of the Chief Information Officer

Supporting Statement for Paperwork Reduction Act Submission
Office of Public and Indian Housing (PIH)
Renewal Request of Form HUD-50058, Form HUD -50058 MTW
Multifamily Tenant Characteristics Family Report
OMB # 2577-0083

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.

This Paperwork Reduction Act submission describes the proposed renewal of Form HUD-50058 Family Report and Form HUD-50058 Moving to Work (MTW) Family Report, a derivative of the Form HUD-50058.

The Office of Public and Indian Housing of the Department of Housing and Urban Development (HUD) provides funding to Public Housing Agencies (PHAs) to administer assisted housing programs. Form HUD-50058 and Form HUD-50058 MTW Family Reports solicit demographic, family profile, income and housing information on the entire nationwide population of tenants residing in assisted housing. This information allows HUD to monitor and evaluate its programs as required under the following:

- The United States Housing Act of 1937 (42 U.S.C 1437 et seq.)
- Housing and Community Development Act of 1987 (42 U.S.C. 3543(a) – authorizes PHAs to collect social security data)
- Title VI of the Civil Rights Act of 1964 (42 U. S. C. 2000d);
- the Fair Housing Act (42 U. S. C. 3601-19)
- Quality Housing and Work Responsibility Act of 1998 (Public Law 105-276 Title V)
- HUD Appropriations Act of 1996 (Public Law 104-134 Section 204)
- “Electronic Transmission of Required Family Data for Public Housing, Indian Housing, and the Section 8 Rental Certificate, Rental Voucher, and Moderate Rehabilitation Programs” (24 CFR Part 908)
- 24 CFR Part 5 (5.210 through 5.240)

The Form 50058 and Form 50058-MTW provide information about program participants at the time of an action that can affect program participation and rental subsidy calculation. Actions include admittance to the program, annual reexamination of income, change of unit, and end of program participation.

For each household member, the Form 50058 and 50058MTW collect name, address, social security number, ethnicity, race, citizenship, gender, assets, income, and expected income. Additional data is collected for the head of household on employment status, assistance received under other federal assistance programs (TANF, Medicaid, etc.) and benefits such as health insurance provided by employers. The form also shows the Total Tenant Payment each household contributes towards rent, and other information about rental subsidy calculations.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

This information is collected from participants in the Office of Public and Indian Housing’s public housing and housing choice voucher (HCV programs). It is collected from program participants by Public Housing Agencies (PHAs), who in turn submit the data to HUD using form HUD-50058 and Form 50058-MTW. PHAs are typically chartered independent entities established by the state legislature to administered affordable housing programs in a jurisdiction. Some are units of local government.

The information is collected from tenants at any time there is a change in circumstances or an action that can affect the calculation of rental subsidy to a participating household. This includes annual reexaminations of households to determine if there have been any changes to households that can affect participation in the program or rental subsidy calculation. This information is collected from residents in a variety of formats. PHAs typically hold face-to-face interviews with the head of household to discuss any changes of circumstances or actions. This information is then used by PHA staff to fill out the Form HUD-50058 or Form HUD-50058 MTW. Some PHAs allow program participants to provide the information to PHA staff via telephone or written communication; however this is a matter of PHA policy.

PHAs are required to submit any revised Form HUD-50058s and 50058-MTWs to HUD monthly, and to provide at least one HUD-50058 or 50058-MTW for each household annually.

This information is utilized for the subsequent purposes:

- Analyze assisted housing programs;
- Determine the occupancy level of public housing and calculate the operating subsidy in accordance with 24 CFR 990;
- Permit PHAs to monitor their own reporting to identify favorable and unfavorable trends;
- Monitor PHAs and participants for compliance with program regulations and requirements;
- Fraud detection and prevention via rent/income monitoring;
- Housing inventory and development of program initiatives with emphasis on the housing of special needs groups; and
- Make available accurate demographic information depicting tenant characteristics to Congress and other interested parties (however this data is typically scrubbed of any personally identifiable information).

Occasionally, this data is used for research purposes, such as modeling the effect of proposed rent reforms. Research may be conducted by research firms under contract to HUD. However this data is always scrubbed of personally identifiable information such as social security numbers and names before it is used for this purpose, and all procedures for handling of confidential information, such as restricted access by contractors and secure facilities, are followed.

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.

Several vendors offer Housing Agency management software, including creation/submission of 50058s. HUD offers a free software program called Family Reporting Software (FRS) to all PHAs. Data collected via Form HUD-50058 and Form HUD-50058 MTW Family Reports is electronically submitted by the PHAs into the PIH Information Center (PIC) on a monthly basis. PIC is an automated database system which exchanges this data, between Housing Authorities and Local HUD Offices. This data repository is also accessible to HUD Headquarters and field offices.

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.

Tenant Characteristics directly impact the amount of subsidy for which a household is eligible under HUD's programs. HUD's eligibility requirements are distinct from any other federal program requirements, such as TANF, WIC, or SNAPs. Different programs use distinct household composition data to determine program eligibility. Therefore, while program participants may be reporting some of this information to other federal agencies, they are not reporting all of this data and it cannot be obtained through any other agency. Further, HUD requires a participant's social security number to verify tenant income, which affects rental subsidy calculation. This is necessary to ensure that the maximum number of families can be served in the public housing and housing choice voucher programs.

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.

Failure to collect this data at least annually would impede HUD's ability to provide accurate subsidy to PHAs, create effective program policies, measure the impact of these program policies and funding, and provide accurate information to OMB, Congress and the public.

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;**

Although public housing agencies are only required to submit data annually for each participating household, families move into and out of subsidized units throughout the year. Therefore, the agencies complete Form HUD-50058 and Form HUD-50058 MTW Family Reports for individual families at different times during the year. HUD requires all agencies to electronically submit the forms that they have completed to the PIC system at least monthly. The Department received OMB approval on September 6, 2006, to require PHAs with less than 100 units to submit Form HUD-50058 and Form HUD-50058 MTW Family Reports data monthly as opposed to quarterly (See Attached).

*** 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.

A notice was published in the Federal Register, volume 77, number 161; Page 50149 - 50150, dated 8/20/2012, announcing the intent to submit the proposed information collection to the Office of Management and Budget and invited comments. Comments were received from five agencies as follows:

Usefulness of Information – several commenters questioned the usefulness of the information collection of the 50058 in general. The 50058 collection is needed to obtain needed demographic information to inform HUD of the impact of MTW. The 50058 submission has more recently been used to assess the occupancy rate of public housing developments and calculate the operating fund subsidy due the PHA. HUD also needs family information to ensure compliance with the requirement that MTW agencies serve families at or below 80% of AMI. Without some type of information collection it is impossible to make such an assessment. Similarly, HUD needs to make an assessment on the number of families being served, in order to verify the requirement that agencies serve substantially the same number of families.

Excessive Burden – several commenters indicated they were serving many non-traditional populations (particularly homeless) that would not readily lend themselves to collections of such information. While HUD is sympathetic to this concern, there is a need to obtain information to ensure compliance with the requirement that MTW agencies serve families at or below 80% of AMI. Without some type of information collection it is impossible to make such an assessment. That said, HUD will continue to work with agencies collecting information for non-traditional families to make the collection as least burdensome as possible. Similarly, HUD needs to make an assessment on the number of families being served, in order to verify the requirement that agencies serve substantially the same number of families.

On February 12, 2013, HUD informed the commenters that HUD does not believe the burden associated with this collection is excessive, since most MTW agencies are not utilizing this flexibility. In those instances where the flexibility is being used, HUD will make every effort to minimize burdens associated with the collection in light of the specific families and activities being undertaken.

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.

In accordance with the Federal Privacy Act of 1974, 5 U.S.C. 552a, public housing agencies must inform applicants and resident families about possible Federal Government uses of information contained on Form HUD-50058 and Form HUD-50058 MTW Family Reports, and the systems to monitor reductions in subsidy payment errors. Form HUD-9886 *Authorization for the Release of Information/Privacy Act Notice*, is used to inform residents of the authority for the collection of information, the purpose of the data collection, and the uses of the information collected by the PHAs pursuant to the agencies' obligation to submit information to HUD. Tenants give consent for the collection and use of information by signing Form HUD-9886.

Access to PIC and thus the collection of 50058 information is highly restricted. HUD staff seeking access to the PIC system must request access through HUD's Centralized HUD Account Management Process (CHAMP) and be approved for such access by their immediate supervisor. The request must be specific as to the nature of the access (view only, submissions, etc.) to ensure integrity. PHA access must be requested through the agency's respective field office. Access is time-limited and must be renewed periodically.

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.

Form HUD-50058 and Form HUD-50058 MTW Family Reports do not collect information of a sensitive nature such as sexual behavior and attitudes or religious beliefs. Private information such as income, social security numbers and public benefits however, is required. This information is required for proper administration of the assisted housing programs and for monitoring program performance. This information is used to determine the amount of subsidy for which each participant household is eligible. Without this information, HUD and PHAs cannot determine program eligibility and the amount of federal subsidy each PHA is to receive in order to continue to operate the public housing and housing choice voucher programs. Please refer to section ten for steps taken to attain the consent of residents to collect such information.

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.**

Summary:

Estimate of the Hour Burden of the Collection of Information

Number of responses	2,874,934
Frequency of Response	Annually
Annual Hour Burden	1,081,685
Estimated Annual Cost to Respondents	\$18,923,433

It takes approximately 40 minutes for PHA field officers to collect and input new admission data into each Form HUD-50058 and Form HUD-50058 MTW Family Reports record. Only a portion of the data fields are filled out at each time the form is completed. The fields that are filled are dependent upon the action type or reason for the form's completion. After the initial year of the forms' use, the action type for the form will be recertification rather than new submission. The time it takes to complete a recertification is approximately half that of a new submission. Pre-entry of key information from the previous year is responsible for this time reduction.

Through consultation with financial experts in HUD-HHQ Office Field Operations, an amount of \$17.50 has been approximated to represent the national average as well as the average of the hourly rate for a clerical data entry as well as quality control on the entries.

Detailed:

Information Collection	Number of Respondents (PHA) (with Responses)	*Average Number of Responses per Respondent (with Responses)	Total Annual Responses	Minutes per Response	Total Hours	Regulatory Reference (24 CFR) *See Attached
Form HUD-50058 New Admission	4,114	87	355,984	40	237,323	908.101
Form HUD-50058 Recertification	4,114	583	2,398,340	20	799,447	908.101
Form HUD-50058 MTW New Admission	35	529	13,515	40	3,010	908.101
Form HUD-50058 Recertification MTW	35	4,018	140,630	20	46,876	908.101

4,149 Total Responses: 2,874,934 Total Hours: 1,081,685

**Average Number of Responses per Respondents = Total Annual Responses / Number of Respondents*

Estimated annualized hourly cost to respondents (PHA); Form HUD-50058: To report using Form HUD-50058 Family Report, it will cost the average PHA \$1,051 annually to enter and submit all data for New Admission and \$3,483 annually for Recertification.

- Total Cost for all PHAs; Form HUD-50058 Family Report New Admissions=
 - o 237,323 Total Hours X \$17.50/hour = \$4,153,152.50
- Cost per PHA= \$4,153,152.50 Total cost for all PHAs ÷ 3,953 PHAs (with responses) =\$1,051 per PHA annually
- Total Cost for all PHAs; Form HUD -50058 Family Report Recertification =
 - o 799,447 Total Hours X \$17.50/hour= \$13,990,322.50

- Cost per PHA=\$13,990,322.50 Total cost for all PHAs ÷ 4,017 PHAs (with responses) = \$3,483 per PHA annually

Estimated annualized hourly cost to respondents (PHA); Form HUD-50058 MTW: To report using Form HUD-50058 Family Report, it will cost the average PHA \$6,177 annually to enter and submit all data for New Admissions and \$23,437 annually for Recertification.

The annual burden is calculated by determining the following:

- Total Cost for all PHAs; Form HUD-50058 MTW Family Report New Admission =
 - o 3,010 Total Hours X \$17.50/hour= \$52,675
- Cost per PHA = \$52,675 Total cost for all PHAs ÷35 PHAs (with responses) = \$ 1,505 per PHA annually
- Total Cost for all PHAs; Form HUD-50058 MTW Family Report Recertification =
 - o 46,876 Total Hours X \$17.50/hour= \$820,330
- Cost per PHA =\$820,330 Total cost for all PHAs ÷35 PHAs (with responses) = \$23,438 per PHA annually

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).

Total annual capital and startup cost burden to PHA:

Estimating annual capital and startup cost burdens to PHAs is difficult to determine. Most respondents (PHAs) utilize automated software for the collection, transmission and storage of Form HUD-50058 and Form HUD-50058 MTW Family Reports. Several vendors provide software services to PHAs however, the software is used for several day-to-day business functions not, exclusively form reporting.

Additionally, HUD provides all PHAs with free Family Reporting Software (FRS). PHAs can use this software to electronically submit Form HUD-50058 and Form HUD-50058 MTW Family Reports data to PIC.

Total operation and maintenance of services components:

Estimating the cost to PHAs for the transmission of the Family Reports is difficult to estimate because of the difference in PHA, size, organization structure and administrative capability. A significant cost factor that can be tracked is the time involved to collect the date, fill out the form and electronically submit the data. This information is provided in section 12.

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.

The estimated annualized cost to the Federal government is \$3,143,000. Approximated on current, 2009 information, the total annual cost to maintain the PIC system, which includes the Form HUD-50058 and Form HUD-50058 MTW Family Reports module, is \$893,000. The developmental cost is \$1,700,000. The cost to HUD headquarters staff to monitor the system is \$150,000 (5%-6% of contractor cost). HUD estimates that contractors and HUD staff spend 40% of their time on maintenance and monitoring the Form HUD-50058 and Form HUD-50058 MTW Family Reports Module. The annual cost of HUD headquarters staff labor to monitor the module is approximately \$100,000. The annual cost of HUD headquarters staff to maintain the module is \$300,000.

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

This is a revision to a currently approved collection.

- The changes in the calculations in #13 and Supporting Statement #12 are due to the MTW Program increasing from 25 participating housing agencies at the time of the last form approval to 35 housing agencies at this time.
- The main reason for the form change is to add the ability to collect information on local, non-traditional families.
 - The current 50058-MTW is not set up to collect this information. Therefore, there are families that MTW agencies are serving that are not being reported on in the PIC system.
 - This is causing an undercounting of families served with MTW funds. Also, there were five MTW agencies added since this form was last updated.
 - This increase in participation in the MTW program has increased the number of respondents and the burden hours. The MTW program has added Tacoma, Orlando, Champaign, Boulder and Lexington-Fayette housing authorities.
- The other minor change is a clarification to add category of H = Traditional Homeownership in Section 1.c. This category is currently accepted and data is collected in Section 22, but is not listed in the choices under 1.C.

The changes to the HUD-50058 MTW form are as follows:

- Create a Local, Non-Traditional Assistance “LN” program code categorization in Section 1.C Form 50058-MTW to track households that are provided assistance through local, non-traditional MTW programs in addition to public housing, tenant-based and project-based assistance.
- Add the categories of H = Traditional Homeownership. This category is currently accepted but is not listed in the choices under 1.C, so this is a clarification.
- Add LH = Local, Non-Traditional Homeownership which is another classification for homeownership assistance that does not fall under Sections 8 and 9 of the 1937 Act and thus needs the Local, Non-Traditional categorization.
- Add Local, Non-Traditional Assistance to the heading of Section 21 of Form 50058-MTW to allow detailed reporting on this type of assistance.
- Add LH = Local, Non-Traditional Homeownership to Section 22 of Form 50058-MTW to allow detailed reporting on this type of assistance.

There are no changes to the standard 50058 form.

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.

The PIC system captures the information from Form HUD-50058 and Form HUD-50058 MTW Family Reports and creates monthly reports such as the Resident Characteristics Report which is available to the public on the HUD website. It provides demographic and income statistics about tenant families that participate in the Housing Programs.

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.

Not applicable. HUD will display the OMB control number and expiration date on the form.

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

This collection of information does not employ statistical methods.