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
Office of Public Housing and Voucher Programs

2. OMB Control Number: a. **2577-0267** b. ☐ None

3. Type of information collection: (check one)
- a. ☐ New 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:
Enterprise Income Verification (EIV) System User Access Authorization Form and Rules of Behavior and User Agreement

8. Agency form number(s): (if applicable)
Form HUD-52676 I and Form HUD 52676

9. Keywords:
Housing, EIV System, Access Authorization Form, Rules of Behavior

10. Abstract:
The Federal Privacy Act, 5 USC 552a, as amended, requires HUD to identify all individuals who access and use personally identifiable information (PII) maintained in HUD systems. This information collection identifies the individuals at public housing agencies that will access PII from HUD's Public and Indian Housing EIV System.

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. Required to obtain or retain benefits
- c. **X** Mandatory

13. Annual reporting and recordkeeping hour burden:

a. Number of respondents	13,107
b. Total annual responses	13,607
Percentage of these responses collected electronically	100%
c. Total annual hours requested	10,736
d. Current OMB inventory	18,288
e. Difference (+,-)	-7552
f. Explanation of difference:	
1. Program change:	0
2. Adjustment:	-7552

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
b. Total annual costs (O&M)	0
c. Total annualized cost requested	0
d. Current OMB inventory	0
e. Difference	0
f. Explanation of difference:	
1. Program change:	0
2. Adjustment:	0

15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X")
- a. Application for benefits
- b. Program evaluation
- c. General purpose statistics
- d. Audit
- e. **X** Program planning or management
- f. Research
- g. **P** 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. ☐ Biennially 8. ☐ Other (describe)

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: Nelson Stephens
Phone: (202) 475-8601

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.

N/A

Signature of Program Official:	Date:
X Delton Nichols, Deputy Director Office of Public and Indian Housing, Real Estate Assessment Center	

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): Enterprise Income Verification (EIV) System – User Access Authorization Form and Rules of Behavior/User Agreement

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.

HUD's regulations at 24 CFR §§5.216, 5.218, and 5.233, and 24 CFR §908.101, require PHAs to use the Enterprise Income Verification (EIV) system in its entirety to verify tenant employment and income information during mandatory reexaminations of family composition and income, and to reduce administrative and subsidy payment errors in accordance with 24 CFR §5.236 and administrative guidance issued by HUD.

Using EIV as an upfront income verification technique, PHAs can identify, recover, and prevent improper payments before they occur consistent with the *Improper Payments Elimination and Recovery Act of 2010*, 31 U.S.C. 3321, and President Barack Obama's Executive Order 13520, *Reducing Improper Payments and Eliminating Waste in Federal Programs*, issued November 20, 2009.

The Federal Privacy Act (5 USC 552a, as amended), requires that (1) HUD have appropriate safeguards to protect the information contained in the EIV system (5 USC 552a(e)); and (2) keep an accurate accounting of data disclosed from this system of records; more specifically, the date, nature, and purpose of each disclosure of record to any person or to another agency, and the name and address of the person or agency to whom the disclosure is made (5 USC 552a(c)).

See Exhibits A1 through A8.

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.

The authorizing official (the PHA Executive Director or designee) determines which staff need access to the EIV system based upon staff responsibilities and duties. Prior to granting public housing agency (PHA) staff access to the EIV system or authorization to view system-generated content, HUD requires each individual to complete a PDF or Microsoft Word fillable Form HUD 52676. This form enables HUD to: 1) identify the user; 2) verify the type of system access requested; 3) provide the user with HUD's Rules of Behavior for system usage and information about the user responsibilities to protect data protected under the Federal Privacy Act (5 USC 552a) after access is granted; and 4) obtain the signature of the user certifying the user's agreement to the Rules of Behavior and responsibilities associated with his/her use of the EIV system.

For users requesting access to the EIV system, the PHA submits the form via email, fax, or U.S. mail to the designated HUD EIV Coordinator who grants access to the EIV System. For users who will not have access to the EIV system, but who will view system generated information in hard or electronic copy, the form is not sent to the HUD EIV Coordinator for processing, but is kept of file at the PHA.

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 is collected on a PDF-fillable or Microsoft Word-fillable copy of the Form HUD 52676 document and includes a certification to applicable training and agreeing to the Rules of Behavior. For those individuals who will have access to the EIV system, the form is then emailed, faxed, or mailed to HUD. See Exhibits B1 and B2. At this time, because PHAs must retain a signed and dated copy of each completed Form HUD 52676 in their files, no changes to the method of collection are being considered.

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 because no similar information is collected.

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.

The information being collection has no significant impact on small businesses.

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.

This information is collect to ensure that only authorized individuals have access to the EIV System. If this information is not collected, HUD will not be in compliance with the Federal Privacy Act.

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;**

If an EIV System user's level of access to EIV System changes, the user must provide the PHA with updated information in certain sections of the Form HUD 52676.

*** 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;**

This collection of information does not require the uses of a statistical survey.

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

This collection of information does not require the use of a statistical data classification.

***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.**

Not applicable

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 in the *Federal Register*, Volume78, No.58, Page 18362, on March 26, 2013. No comments were received

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

No payment or gift will be provided to respondents.

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

No assurance of confidentiality is needed nor are any provided.

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 questions are being asked.

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.**

Estimate of the Hour Burden of the Collection of Information	
Number of respondents	13,607
Frequency of Response	On occasion
Annual Hour Burden	10,736
Estimated Annual Cost to Respondents	$ 212,895

The annual burden was calculated from the following:

1. The number of actual PHA staff EIV system users as of March, 12, 2013, which is **22,655**.

2. The number of PHA staff who may view or handle EIV information without direct system access, which is approximately **29,000**. This number is based on the PHA's program size, including the size of both the public housing program and the Section 8 program.
3. The number of individuals at PHAs requesting system access for the first time. In 2011 that was 4,668 and in 2012 that was 3,867, for an average of **4,268** new system users annually. This is approximately 19% of the total number of actual system users in number 1. above.
4. The estimated annual number of PHA staff who for the first time, will only view or handle EIV information but not access the system. This is calculated by taking the total of view/handle only users in number 2. above multiplied by the same rate as those requesting access for the first time in number 3. above. This is 29,000 X 19% = **5,510** users.
5. The estimated number of current PIH EIV system users who will need to modify their system access once annually. In 2011, this was 3,197 and in 2012 this was 3,461, for an average of **3,329** modifications annually.
6. The number of respondents is the sum of numbers 3., 4., and 5. above. This is 4,268 + 5,510 + 3,329, which equals **13,107**.
7. The number of new and current EIV system users who will need to modify their system access two or three times annually, which is estimated to be 10% of PHA staff who are system users under number 5. above, for an average of 1.5 new responses each. This is 333 x 1.5 = **500.**
8. The total number of annual responses is the sum of line 6. + line 7, which equals **13,607**.
9. The estimated amount of time it takes for the respondent to read and complete the Form HUD 52676, including the Form Instructions, is approximately:
    a. 1.0 hour for each initial submission; and
    b. 0.25 hours for each subsequent, occasional submission.
10. Initial and subsequent periodic collections:
    a. Annual hour burden for initial collections is the product of line 9a times [line 3 + line 4]. This is 1.0 x 9778, which equals **9778 hours.**
    b. Annual hour burden for subsequent periodic collections is the product of [line 9b times line 5] + [line 9b times line 7]. This is [.25 x 3,329] + [.25 x 500], which equals **958 hours**.
    c. Total annual hour burden is the sum of lines 10a and 10b above, which equals **10,736** hours.

The estimated annual cost to respondents is determined by multiplying the annual hour burden by $19.83 per hour, which is the 2011 median rate of pay for community and social service occupations, according to the Department of Labor's Bureau of Labor Statistics.

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

There is no additional annual cost burden to respondents or record-keepers resulting from this collection of information.

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 costs to the federal government, based on a GS-13/1 rate, are provided in the table below. The GS-13/1 rate is the average salary for a Program Analyst/Public Housing Revitalization Specialist/Portfolio Management Specialist. The hourly cost for cost is assuming an analyst's annual salary of $71,674 or an hourly rate of $34.34. The average amount of time it takes to review the Form HUD 52676 and grant access to the EIV System is approximately 15 minutes. The average amount of time it takes to review a modified access submission and modify the access in the EIV system is approximately 10 minutes.

Total Estimated Annual Costs to the Federal Government:

52676 Submission	Number of Respondents	Total Burden Hours	X	Hourly Rate	Annualized Costs
Initial Submission	4268	1067		$ 34.34	$ 36,641
Modified Access Submission	3829	639		$ 34.34	$ 21,944
Totals	**8097**	**1706**			**$ 58,585**

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

The estimated burden hours reported on Item 13 have been updated from the 2010 PRA submission
to reflect: 1) the 2011 average annual salary and hourly rate for community and social service occupations; 2) a decrease in the number of respondents requesting access or modification of system access based on actual responds received during the past two years; and 3) the estimate of the burden hours imposed on non-system users. Except for these items, no other adjustments have been made to the estimated burden hours because no significant revisions have been made to the data collection template.

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 information collected is not 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.

HUD will display the OMB control number and new expiration date on all collection instruments. See Exhibit B1 and B2.

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.