
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 Milan Ozdinec, Deputy Assistant Secretary, Office of Public Housing and Voucher Programs, PE	Date:
Signature of Senior Officer or Designee: X Colette Pollard, Departmental Reports Management Officer Office of the Chief Information Officer	Date:

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification

1. What information is being collected, from whom, and why is it needed? Explain what the information is and why it's necessary. Identify any legal or administrative requirements that necessitate the collection.

This information collection is necessary to comply with the requirements of 24 CFR Part 965, Subpart C, which implements HUD policies in support of national energy conservation goals by requiring Public Housing Agencies (PHAs) to conduct energy audits and undertake certain cost-effective energy conservation measures. All PHAs shall complete an energy audit for each PHA-owned project under management, not less than once every five years. Solicitations for energy performance contracting are optional, but when undertaken shall be submitted to the HUD Field Office for review and approval prior to contract award. A benefit/cost analysis shall be made to determine whether a change from a master-metering system to individual meters will be cost effective.

Additionally, 24 CFR Part 965, Subpart E, requires PHAs to establish, review and revise utility allowances for PHA-furnished utilities for all check-metered utilities and allowances for resident-purchased utilities for all utilities purchased directly by residents from the utilities suppliers. The PHA shall maintain a record that documents the basis on which allowances and scheduled surcharges, and revisions thereof, are established and revised. Such record shall be available for inspection by residents.

The PHA shall review, at least annually, the basis on which utility allowances have been established and, if reasonably required in order to continue adherence to the standards stated in 24 § 965.505.

2. What's it for; and for whom? What information is collected and how is it collected. Explain how the information is to be used; for what purpose and by whom.

PHAs establish utility allowances, conduct energy audits and conduct a benefit/cost analysis for master-metering system versus check-metered utilities as required by statute and HUD regulations. PHAs optionally solicit for energy performance contracts. The data collected is a compilation of facility and utility usage data for each PHA-owned project. PHAs are required to maintain records for establishing annual utility allowances for HUD and resident inspection/review.

3. Is the information submitted electronically? Will it ultimately reside in an automated system?

This collection of information does not require the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

4. Is this information collected elsewhere? Also, review current information collection packages for potential consolidation.

No, the information is not collected elsewhere.

5. Does the collection of information impact small business or small entities (item 5 of OMB form 83-I)? Describe any methods used to minimize burden.

If a small PHA cannot develop the required utility allowance information, HUD regulations allow them to use information from other sources.

6. Why can't the information be collected less frequently – or not at all?

The regulations at 24 CFR 965 require that PHAs complete an Energy Audit once every five years. The utility allowances are required to be established, reviewed and updated at least annually as required by 24 CFR 965, Subpart E.

7. Explain any special circumstance requiring:

- **respondents to report information more than quarterly;**
- **a written response in fewer than 30 days;**
- **more than an original and two copies of any document;**
- **respondents to retain records other than health, medical government contract, grant-in-aid, or tax records for more than three years.**
- **a statistical survey not designed to produce results than can be generalized to the universe of study;**
- **the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **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 data with other agencies for compatible confidential use; or**
- **respondents to submit proprietary trade secret, or other confidential information.**

There are no special circumstances as described above that relate to this information collection.

8. Identify the date and page number of the *Federal Register* notice (and provide a copy) soliciting comments on the information. Summarize public comments and describe actions taken by the agency in response to these comments. Describe all efforts to consult with persons outside the agency to obtain their input.

HUD published a Notice of Proposed Information Collection for public comments in the *Federal Register*, Volume 78; No. 238; Page 75366, on December 11, 2013. The public was given until January 10, 2014, to submit comments on the proposed information collection. HUD received no comments on this proposed collection.

9. Explain any payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts to respondents are provided.

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

No assurance of confidentiality is provided to respondents.

11. Justify any questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private.

The information collection does not contain questions of a sensitive nature.

12. Estimate public burden: number of respondents, frequency of responses, annual hour burden. Read the complete instruction form 83i. Explain how the burden was estimated. Generally estimates should not include burden hours for customary and usual business practices;

- if this collection uses more than one form, provide separate estimates for each form and aggregate the hour burdens in item 13 of OMB Form 83i; and
- 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 and paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

a. The burden of the information collections was calculated as follows:

Section Reference	Number of Respondents	Number of Responses Per Respondent	Estimated Average Time for Requirement (in hours)	Estimated Annual Burden (in hours)	Estimated Annual Costs
965.302 – Energy Audits	620	1	46	28,520	\$8,006,875
965.308-Energy Performance Contracts	22	1	100	2200	\$101,936
965.402-Benefit/Cost Analysis	5	1	3	15	
965.502-Establish utility allowances	5	1	20	100	\$4,633
965.507-Review utility allowances	3100 ¹	1	2	6200	\$287,263
965.507-Revise utility allowances	1240 ²	1	20	24,800	\$1,148,984
965.506-Establishment of Surcharges for Excess Consumption	200	1	1	200	
965-508-Individual Relief Criteria	1000	1	1	1000	
Total Paperwork Burden for OMB Control #2577-0062				63,035	

b. Energy Audits will typically be performed by contracted providers. HUD estimates that audits would cost \$33 per public housing unit resulting in an annual cost estimated at \$8,006,875 (1,213,163 X \$33) (divided by 5 years).

¹ This is the total number of PHAs covered under this statute.

² This number reflects 40% of all Public Housing Agencies; this is the estimated number of housing agencies that revise their utility allowances, annually

- c. The establishment, review and revision of Utility Allowances would likely be performed by contracted providers. The skill set for this work is estimated at the equivalent of a GS 14 step 1 in the Federal government pay scale resulting in an hourly cost of \$46.33 as stated in the 2012 General Schedule Locality Pay Tables, using the locality “Rest of United States.” As a result, the cost for each utility allowance process would be as listed below:
 - i. Establishment utility allowances: $(\$46.33 \times 20) \times 5 = \$4,633$
 - ii. Review of utility allowances: $(\$46.33 \times 2) \times 3,100 = \$287,263$
 - iii. Revision of utility allowances: $(\$46.33 \times 20) \times 1,240 = \$1,148,984$

13. Estimate of the annual cost to respondents or recordkeepers (do not include the cost of hour burden shown in Item 12 and 14). Read the complete instructions on the form 83i.

There are no specialized material or equipment costs associated with this information collection.

14. Estimate annualized costs to the Federal government.

Estimated annual cost to the Federal government is estimated as the cost for field offices to receive and review each submission at 4 hours per each respondent’s Energy Audit. The skill set for this work is estimated at the equivalent of a GS 14 step 1 in the Federal government pay scale resulting in an hourly cost of \$46.33 as stated in the 2012 General Schedule Locality Pay Tables, using the locality “Rest of United States.” Also, Energy Performance Contracts require 22 hours of staff review time, by employees with a similar skill set. The annualized cost for the federal government is \$101,936. $(2200 \times \$ 46.33 = \$101,936)$

15. ** Explain any program changes or adjustments reported in items 13 and 14 of the OMB Form 83i.

The number of respondents was changed to reflect the current number of PHAs as well as the number of respondents used in the calculation. Also, the numbers used to calculate the burden hours were updated to reflect current practices. Specifically, HUD has examined the practices for energy audits, energy performance contracts, and revising utility allowances and updated the number of responses and the hours necessary to complete these tasks.

16. If the information will be published, outline plans for tabulation and publication.

The information results will not be published.

17. Explain any request to not display the expiration date.

HUD is not seeking approval to not display the expiration date of the OMB approval.

18. Explain each exception to the certification statement identified in item 19.

There are no exceptions to the certifications statement identified in item 19, OMB 83-I.

B. Collection of Information Employing Statistical Methods

This collection of information will not employ statistical methods.