

**Supporting Statement for Paperwork Reduction Act Submissions**  
**HUD Multifamily Energy Assessment**  
**HUD-9614**

**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.**

Section 154 of the Energy Policy Act of 2005 directs HUD to develop and implement an integrated strategy to reduce utility expenses through cost-effective energy conservation and efficiency measures and design, and construction of public and assisted housing. In support of these requirements, HUD has revised its administrative requirements in Chapter 12, "Energy Conservation" of HUD Handbook 4350.1 REV-2. Additionally, the chapter supports HUD's Energy Strategy as reported to Congress in August 2012 and the Memorandum of Understanding entered into by HUD, The U.S. Environmental Protection Agency, and the U.S. Department of Energy in 2002.

**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 will be used by owners and managers of multifamily housing projects to assist with determining reasonable and necessary upgrades to their property to meet cost-effective energy efficiency standards.

**3. Describe whether, and to what extent the collections of information involves the use of automated, electronic, mechanical, or other the 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.**

Automation of this information collection is not feasible because the energy assessment requires owner staff to physically walk through the project and assess energy improvement needs. In cases where the owner requests a conversion from master metered utilities to individually metered (tenant paid) utilities, the owner must provide documentation, including a statement from the utility company, a copy of the project's latest form of compliance documentation and time frames, and comments received during the tenant review process.

**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 other sources for this information, and the information collected on form HUD-9614 by the owner is not directly provided to HUD.

**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 collection of information does not involve small business 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.**

Owners are expected to certify that they are in compliance with the requirements and recommendations of Chapter 12 “Energy Conservation” of HUD Handbook 4350.1 *Multifamily Asset Management*. HUD would be in noncompliance with Section 154 of the Energy Policy Act of 2005 by failing to encourage the efficient use of energy in multifamily properties.

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

There are no special circumstances for respondents.

**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. Specifically address comments received on cost and hour burden.**

- **Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported.**
- **Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every**

**three years – even if the collection of information activity is the same as in prior periods. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.**

Information collected is conducted in a manner consistent with the guidelines of 5 CFR 1320.8(d). The Notice announcing this collection of information appeared in the *Federal Register* on December 11, 2013, Vol. 78, No. 238, page 75368. No comments were received.

In addition, the property managers of three owners of subsidized properties were contacted in conjunction with this Paperwork Reduction Act submission.

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

There are no payments or gifts to respondents.

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

No assurance of confidentiality, statute, regulation, or agency is 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.**

There are no questions of a sensitive nature.

**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 burden hours, and explain the reasons for the variance. Generally estimates should not include burden hours for customary and usual business practices;**
- **if this request covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of form OMB 83-I; 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 or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

### Estimates of the Hour burden of the Collection of Information

Information Collection	Number of Respondents	Frequency of Response	Total Annual Responses	Burden Hours per Response	Annual Burden Hours	Hourly Cost	Total Annual Cost
HUD-9614	12,290	1	12,290	8	98,320	\$ 17.00	\$ 1,671,440
Certification of Compliance	6,145	1	6,145	0.25	1,536	\$ 17.00	\$ 26,116
Total	18,435		18,435		99,856		\$ 1,697,556

Estimated number of responses for Certification of Compliance is based on 5% of total respondents that may request a budget based rent increase and as a result will be required to provide a certification of compliance with HUD Handbook 4350.1, Chapter 12.

Hourly cost is based on an estimate of the owner or owner's staff to perform the energy assessment and prepare the necessary documents if developing an energy conservation plan, or requesting a utility conversion. Estimated hourly costs were obtained from payscale.com.

**13. Provide an estimate of 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).**

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for**

**reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There are no additional costs to respondents.

**14. Provide estimates of annualized cost 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 also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

**Estimates of Annualized Cost to the Federal Government**

<b>Total Annual Responses</b>	<b>Burden Hours per Response</b>	<b>Total Annual Burden Hours</b>	<b>Hourly Cost</b>	<b>Total Annual Cost</b>
12,290	1	12,290	\$ 28.88	\$ 354,935
6 ,145	0.25	1,536	\$ 28.88	\$ 44,367
623,893	1.25	13,826		\$ 399,302

\*Estimated cost per hour for HUD staff (GS-12) to review and process the documents for this collection

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

This is an extension of a currently approved collection. There are no program changes or adjustments. This collection represents the time and cost burden for projects requesting rent increases and compliance with other requirements of Chapter 12 in HUD Handbook 4350.1. Owners may use alternative methods of gathering energy use data, and the submissions are not recorded electronically; consequently, the Estimated number of responses for Certification of Compliance is based on 5% of total respondents that may request a budget based rent increase and as a result will be required to provide a certification of compliance. The results here represent an increase in the number of owners requesting rent increases.

At the initial request for OMB approval in 2007 the form had not been in use, and an estimate of time to complete was essentially an estimated guess. Later actual application of the form showed the need for more time, and the estimate was increased with this submission.

**16. For collection 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 results of this collection 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.**

HUD is not requesting approval to not display the expiration date.

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

There are no exceptions to the certification statement identified in Item #19 on form OMB 83i, "Certification for Paperwork Reduction Act Submissions".

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## **B. Collections of Information Employing Statistical Methods**

There are no statistical methods used in this collection.