

# 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/Sub-agency Originating Request: <b>U.S. Department of Housing and Urban Development</b> Office of Public and Indian Housing, Real Estate Assessment Center		2. OMB Control Number: a. <b>2577-0241</b> b. <input type="checkbox"/> None	
3. Type of information collection: (check one) a. <input type="checkbox"/> New Collection b. <input type="checkbox"/> Revision of a currently approved collection c. <input checked="" type="checkbox"/> Extension of a currently approved collection d. <input type="checkbox"/> Reinstatement, <b>without change</b> , of previously approved collection for which approval has expired e. <input type="checkbox"/> Reinstatement, <b>with change</b> , of previously approved collection for which approval has expired f. <input type="checkbox"/> 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. <input checked="" type="checkbox"/> Regular b. <input type="checkbox"/> Emergency - Approval requested by c. <input type="checkbox"/> Delegated 5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 6. Requested expiration date: a. <input checked="" type="checkbox"/> Three years from approval date    b. <input type="checkbox"/> Other (specify)	
7. Title: <b>Exigent Health and Safety Deficiency Correction Certification</b>			
8. Agency form number(s): (if applicable) None			
9. Keywords: Housing, Safety, Health			
10. Abstract: Public Housing Agencies (PHAs) correct/mitigate exigent health and safety (EHS) deficiencies cited in property inspections conducted pursuant to HUD's Uniform Physical Condition Standards (UPCS) inspection protocol. Through the web-based template, PHAs electronically certify that they have corrected/mitigated the EHS deficiencies.			
11. Affected public: (mark primary with "P" and all others that apply with "X") a. Individuals or households      e. Farms b. <input checked="" type="checkbox"/> Business or other for-profit      f. Federal Government c. Not-for-profit institutions      g. <input checked="" type="checkbox"/> 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. <input checked="" type="checkbox"/> Mandatory	
13. Annual reporting and record keeping hour burden: a. Number of respondents      1,134 b. Total annual responses      1,134 c. Percentage of these responses collected electronically      100% d. Total annual hours requested      346.29 e. Current OMB inventory      333.57 f. Difference (+,-)      +12.71 g. Explanation of difference: 1. Program change: 2. Adjustment:      +12.71		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      Not Applicable b. Total annual costs (O&M)      \$0.00 c. Total annualized cost requested      \$0.00 d. Total annual cost requested      \$0.00 e. Current OMB inventory      0 f. Explanation of difference: 1. Program change: 2. Adjustment:	
15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X") a. Application for benefits      e. Program planning or management b. <input checked="" type="checkbox"/> Program evaluation      f. Research c. General purpose statistics      g. <input checked="" type="checkbox"/> Regulatory or compliance d. Audit		16. Frequency of recordkeeping or reporting: (check all that apply) a. <input type="checkbox"/> Recordkeeping      b. <input type="checkbox"/> Third party disclosure c. <input checked="" type="checkbox"/> Reporting: 1. <input type="checkbox"/> On occasion      2. <input type="checkbox"/> Weekly      3. <input type="checkbox"/> Monthly 4. <input type="checkbox"/> Quarterly      5. <input type="checkbox"/> Semi-annually      6. <input checked="" type="checkbox"/> Annually 7. <input type="checkbox"/> Biennially      8. <input type="checkbox"/> Other (describe)	
17. Statistical methods: Does this information collection employ statistical methods? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		18. Agency contact: (person who can best answer questions regarding the content of this submission) Name: <b>Claudia J. Yarus</b> Phone: (202) 475-8830	

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## 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 record keeping 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.

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Signature of Program Official:

Date:

Donald J. La Voy, Deputy Assistant Secretary  
Real Estate Assessment Center

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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 Submissions

## A. Justification

1. The Department's Uniform Physical Condition Standards (UPCS) regulation (24 CFR part 5, subpart G) provides that HUD housing must be decent, safe, sanitary, and in good repair. The UPCS regulation also provides that all area and components of the housing must be free of health and safety hazards.

HUD conducts physical inspections of the HUD-funded housing, and in particular public housing, to determine if the UPCS standards are being met. Pursuant to the UPCS inspection protocol, at the end of the inspection (or at the end of each day of a multi-day inspection) the inspector provides the property representative with a copy of the "Notification of Exigent and Fire Safety Hazards Observed" form. Each exigent health and safety (EHS) deficiency that the inspector observed that day is listed on the form. The property representative signs the form acknowledging receipt.

Public housing agencies, (PHAs) are required to correct, remedy or act to abate EHS deficiencies within 24 hours (Public Housing Assessment System (PHAS) regulation at 24 CFR part 902.21; **Exhibit A**). PHAs also are to notify the Department within three business days of the date of inspection, which is the date the PHA was provided notice of these deficiencies, that the deficiencies were corrected/remedied/acted on to abate within the prescribed time frame.

2. HUD uses the data it collects to monitor compliance with regulatory requirements and to assist in ensuring the correction of EHS deficiencies on HUD assisted properties. HUD staff reviews the certifications and conducts applicable follow-up activities.

Attached and labeled **Exhibit B** is a copy of the templates PHAs complete on line, via the internet, to certify to the correction, remedy or actions taken to abate the EHS deficiencies cited in the inspection reports. Upon completion of all of the required screens, the PHA transmits the data to HUD. The required OMB Disclosure appears on the screen when the PHAs enter the system to complete and submit the EHS Certificate, see page 5 of **Exhibit B**.

3. The requested data is transmitted to HUD electronically, increasing data accuracy and reducing respondent burden. Should a PHA not be able to submit this information electronically due to an administrative or cost burden, the PHA may be approved to submit the required information manually.
4. There will be no duplication of information. There is no similar information already available that could be used or modified.
5. The only entities that possibly may be adversely impacted by any costs associated with HUD's electronic reporting requirement are small PHAs that do not have any, or have limited, web access and computer experience. Any possible adverse impact is lessened due to the frequency of when inspections are conducted, as set forth in Sections 902.13 of the PHAS rule. The Department has guides available on the HUD website, provides training, and offers other technical assistance on this process.
6. PHAS requires that PHAs correct/remedy/act to abate EHS deficiencies within 24 contiguous hours of the notice of the deficiency and that PHAs certify to HUD within three business days that the EHS deficiencies have been corrected/remedied/acted upon to abate within that 24 hour period. Without this information, HUD's interest (as well as the interest of taxpayers) will be unprotected and HUD will not be able to identify the risks due to neglected maintenance of HUD assisted property. Because the deficiencies are life threatening it is in the best interest of the residents that the PHAs ensure all identified EHS deficiencies are immediately corrected/remedied/or acted on to abate. The evaluation of this data may impact funds used to achieve HUD program obligations, or to detect fraud, waste and abuse.

7. Because the electronic submission process requires respondents to submit confidential data, HUD has provided each program participant with a unique user identification code, limited the information available via its assessment system to employees with approved security access to the system, and allowed submitters “read-only” capability that will allow them to view their submitted data via the Internet.
8. The Department published a Notice of Proposed Information Collection for Public Comment in the *Federal Register*, Volume 78, Page 78376, on December 26, 2013. (**Exhibit C**) The public was given until February 24, 2014 to submit comments. HUD received no comments.
9. No payments or gifts are provided.
10. All data that can be linked to a particular PHA is secured from public access. When a PHA submits data electronically to HUD, security prevents users outside of HUD from intercepting this data. HUD’s web access security system ensures that all management data is secure. The authorities or justifications for the security system are: the Information Security HUD Handbook 2400.24, the Computer Security Act of 1987, the Clinger-Cohen Act of 1996, OMB Circular A-130 part 3, and the Government Information Security Reform Act of 2000 (GISRA). The Department's web access security system allows users to apply online for an ID and password and to reset a forgotten password. It also controls and limits access to systems for authorized users by managing the roles and responsibilities for each user of each system.

There are primary and secondary users. Secondary users are granted read-only access to the system. (This is similar to the access that users submitting information have; however, the user only is able to see his/her submission.) HUD authorized primary users (i.e., selected staff) have security access to update the information, with strict controls of the tasks that they may perform.

11. No such questions are asked.
12. The estimated burden hours for the collection of this data are provided in the tables below. The annual burden hours are calculated using the average number of PHAs that will respond each year. Only PHAs that have EHS deficiencies observed during the physical inspections of their properties enter information in this system. And, pursuant to Sections 902.13(a) and (b) of PHAS rule, not all public housing properties are inspected annually.

The burden hour calculations are based on the number of EHS deficiencies identified during the inspection of all of the properties operated by a PHA. All of the calculations assume that the time to complete the template depends on the number of EHS deficiencies because PHAs are required to input data for each observed EHS deficiency.

**Total Annual Burden Hour Estimates for PHAs**

<b>Number of EHS Deficiencies</b>	<b>Number of Respondents</b>	<b>Frequency of Requirement</b>	<b>X</b>	<b>Est. Avg. Time for Requirement (Hours)</b>	<b>=</b>	<b>Est. Annual Burden (Hours)</b>
1 - 2	553	1		0.12		66.36
3 - 5	286	1		0.17		48.62
6 - 10	169	1		0.33		55.77
11 - 20	98	1		0.83		81.34
21 - 50	58	1		1.0		52.20
51 +	28	1		1.5		42.0
<b>Subtotals</b>	<b>1134</b>					<b>346.29</b>

<b>Total Estimated Annual Costs to Respondents</b>						
	<b>Number of Respondents</b>	<b>Total Burden Hours</b>	<b>X</b>	<b>Hourly Rate</b>	<b>=</b>	<b>Annualized Cost</b>
<b>PHA Submissions</b>	1134	346.29		\$28.88*		\$10,000.86
* Hourly cost for response assuming a GS-12, Step 1 (\$60,575), Analyst or Manager, hourly rate is \$28.88.						

13. There are no additional costs to respondents.

14. The estimated annualized costs to the federal government, based on a GS-12, Step 1 rate are provided below. A GS-12 Step 1 rate is the average salary for a Field Office Analyst/Manager.

<b>Total Estimated Annual Costs to the Federal Government</b>						
	<b>Number of Respondents</b>	<b>Total Burden Hours</b>	<b>X</b>	<b>Hourly Rate</b>	<b>=</b>	<b>Annualized Cost</b>
<b>PHA Submissions</b>	1134	178.8		\$28.88 *		\$5163.74
* Hourly cost for response assuming a GS-12, Step 1 (\$60,575), Analyst or Manager; hourly rate is \$28.88.						

15. The negligible adjustment (increase) in the annual burden hours is due to the redistribution of the number of EHS deficiencies per PHA based on a review of the most recent four years of inspection data. The adjustment (reduction) in the number of annual respondents is based on the frequency of assessments and physical inspections established in the PHAS rule.

16. None of the information collected will be published.

17. HUD is not seeking approval to not display the expiration date of the OMB approval. The OMB number and the new expiration date will be displayed on a “Disclosure Statement” that will be the first screen that is viewed on the automated form after OMB approval is received.

18. There are no exceptions to item 19 of the OMB 83-I.

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

There are no collections of information employing statistical methods.