

## Supporting Statement (Part A)

### U.S. Department of Housing and Urban Development Office of Policy Development and Research

Information Collection to Establish a Baseline Assessment of the Renewable Energy Capacity within HUD's Public Housing and Multifamily-assisted Housing Stock

Note: This submission is presented as an application for a new collection of information.

**A.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 of each regulation mandating or authorizing the collection of information.**

In June 2013, President Obama put forward a Climate Action Plan (CAP) that is comprised of actions to reduce the amount of energy consumed and greenhouse gases emitted by Americans. As part of CAP, the Treasury Department (LIHTC properties), USDA (Rural Development properties), HUD (public housing and multifamily-assisted properties) have been charged with installing 100 megawatts (MW) of renewable energy capacity by 2020 within the federally assisted housing stock. HUD does not currently collect the necessary information to support an initiative of this kind.

This information collection effort will assist the Department in establishing a baseline assessment of the renewable energy capacity within its public housing and multifamily-assisted housing portfolios. It is proposed that the actual collection will be performed through a contract and analyze and final reporting will be conducted by HUD staff.

Following collection and analysis, HUD will publish the results of the collection effort for all interested parties (independent of participation in the collection) to use. The published data will consist of aggregated results and not contain information that can be used to identify specific housing authorities or multifamily properties.

**A.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 collection will be a one-time effort. Information will be collected to develop the final report and such effort is not expected to be repeated.

Employees of Public Housing Agencies (PHA) and Multifamily-Assisted Housing (MFH) Properties will be asked to identify the capacity and uses of the renewable energy systems within their agencies and properties, respectively. Specifically, the survey will target conventional<sup>1</sup>

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<sup>1</sup> Conventional public housing agencies are housing developments that are publicly owned and provide decent and safe rental housing for eligible low-income families, the elderly, and person with disabilities.

(low-income) public housing agencies, and HUD/FHA-insured<sup>2</sup>, HUD-assisted<sup>3</sup> (subsidized), and Section 202/811<sup>4</sup> multifamily properties.

In an effort to minimize the overall burden placed on targeted participants and increase response rate, the proposed collection effort will be administered through a two-phase approach. It is anticipated that only a small percentage (~ 1%) of the HUD housing stock will have installed renewable energy systems. The primary focus of this data collection effort is to gather information related to the installed renewable energy systems with the Department's housing stock. A description of the two phases is below.

The initial phase will consist of a brief questionnaire that will be sent to all targeted participants (N ≈ 33,100). The purpose of this phase is to get a snapshot of the agencies and properties that have, do not have, and/or plan to install renewable energy systems in the future. In addition, this questionnaire will inquire about the barriers and/or challenges that may have been faced regarding these systems. This phase will only consist of a web-based data collection effort. No follow-up phone calls will be made to non-respondents. It is anticipated that this questionnaire will consist of approx. 8-10 questions and can be completed within 5 minutes.

The second phase will be more in-depth and target the participants who specified that they have (or there is informal evidence indicating that they have) installed renewable energy systems. These questions will focus on the type, capacity, and financing and costs associated with the installed renewable energy systems. This phase will consist of a web-based data collection effort and follow-up phone calls to non-respondents. It is anticipated that the second phase will consist of appropriately 400 parties and can be completed within 10-15 minutes.

To maximize survey response, telephone calls will be made to a subset of non-respondents to encourage them to complete the survey. The results of this collection effort will then be made available to the targeted participants, other federal government agencies, and general public.

This is a new collection.

**A.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. Also describe any consideration of using information technology to reduce burden.**

The collection of information will include information technology collection techniques (i.e., web-based survey) and telephone calls. All responses to this study will be collected through the web-based survey. The proposed web technology will allow respondents to proceed more quickly and accurately through the collection instrument, and serves to improve data quality through more uniform administration of survey questions and more accurate implementation of skip questions. Follow-up telephone calls to a subset of non-respondents will direct them to the

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<sup>2</sup> HUD/FHA-insured properties are entities with mortgages insured by HUD/FHA that have neither rental assistance nor mortgage interest subsidies.

<sup>3</sup> HUD-assisted properties are entities that are either insured under a HUD/FHA mortgage insurance program that includes a mortgage subsidy or provided with some form of HUD rental assistance.

<sup>4</sup> Section 202 and Section 811 properties are entities that provide supportive services to elderly persons and persons with disabilities, respectively.

administered survey and any subsequent responses will be collected through the online collection instrument. This multifaceted approach is expected to make response more rapid and less burdensome to the targeted participants.

**A.4 Describe efforts to identify duplication. Show specifically why similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

There are no current information sources available which would provide this information. There are no programs in the Department (or elsewhere in the Federal Government) for similar efforts. In order to avoid duplicate data collection and data entry, the research team will use HUD administrative data regarding the public housing and multifamily-assisted housing portfolios.

**A.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.**

Given that it is anticipated that a portion of the respondents to this survey will be small housing agencies and multifamily-assisted rental properties, the research team has designed the questionnaire with these participants in mind. Great care will be taken to ensure minimal burden of participating small businesses or small entities.

**A.6 Describe the consequences 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.**

If the collection effort is not conducted, HUD will be unable to assess the existing renewable energy capacity within its housing portfolios. The Department would be forced to develop plans to meet the President's renewable energy capacity goal with less information than will be available as a result of this collection. As a result, the developed plans may be unrealistic and produce a more costly and less effective solution. The targeted participants may also attempt to collect this information independently, resulting in multiple, locally funded collection efforts and far greater costs to the PHA and MFH entities.

**A.7 Explain any special circumstances that would cause an information collection to be conducted in a specific manner.**

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320.6 (Controlling Paperwork Burden on the Public, General Information Collection Guidelines). There are no circumstances that require deviation from these guidelines.

**A.8 If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, as required by 5 CFR 1320.8(3), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and actions by the agency.**

In accordance with the Paperwork Reduction Act of 1995, the Department of Housing and Urban Development (HUD) published a notice (60 day) in the Federal Register on January 21, 2014. The docket number is FR-5758-N-01 and the Federal Register Notice appears on page 3396.

The only response to that notice was from an organization that owns multiple HUD-assisted properties, which offered comments related to the survey's questionnaire. No other comments were received.

The 30-day Federal Register notice was published on April 11, 2014. The docket number is FR-5752-N-37 and the Federal Register Notice appears on page 20220.

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

The respondents to the PHA and MFH web-based survey will not receive payments for completing the survey because the response burden is minimal and respondents are staff of the targeted entities.

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

Because of the nature of the information collected from study participants, and more significantly the method being used (via the Internet) to gather information, strict confidentiality procedures will be followed for this study. The information requested under this collection will be used for research purposes only and will NOT be used for compliance monitoring. The publicly released data will consist of aggregated results and not contain information that can be used to identify specific housing agencies or multifamily properties.

The Department is interested in highlighting the efforts and benefits that some agencies and properties have had with renewable energy systems. At the conclusion of this study, HUD may contact some participants in an effort to develop case studies documenting their successes with renewable energy systems. Participation in the development of case studies will be voluntary on the part of the agencies and properties.

**A.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 information collection of PHAs and MFH properties does not include any questions of a sensitive nature.

**A.12 Provide estimates of the hour burden of the collection of information.**

The study's intention is to gather data from all PHAs and MFH properties, as described in the response to item A.2 above. In total, approximately 33,100 entities (~3,100 PHAs and ~30,000 MFHs) will be targeted to participate, and follow-up phone calls to a subset of non-respondents will be conducted to maximize the response.

Both the PHA and MFH surveys are designed to send a survey invitation to each entity within the respective dataset. For both surveys, the research team is aware that many Executive Directors and Property Managers (or Property Owners) who are associated with more than one agency and federally-assisted property, respectively. Those who fall into this category will receive multiple invitations to participate in the surveys because, as mentioned earlier, every entity within the respective dataset will be sent an invite. Thus, in an effort to minimize the response burden placed on this subset of Executive Directors and Property Managers (or Property Owners), the research team has constructed the surveys to provide participants the option of responding to one survey for multiple agencies and properties.

The research team cannot guarantee that every Executive Director and Property Manager (or Property Owner) who is associated more than one agency and property, respectively, will only respond to the survey once thus, the estimated hour burden for both portfolios is based upon a response from every entity within the two datasets (~33,100).

Exhibit A.12.1 illustrates the respondent burden with 100 percent participation, for the two-phase collection effort, to be 2,885 hours; however, it is more likely that around 80 percent of the surveyed entities will actually complete the survey, in whole or in part. The total burden for the two-phase study is 2,305 hours, based on 80 percent response to the PHA and MFH surveys.

**Exhibit A.12.1: Burden Hours**

<b>Respondents</b>	<b>Projected Response</b>	<b>Number of Entities</b>	<b>Responses Per Entity</b>	<b>Burden Hour Per Response</b>	<b>Annual Burden Hours</b>
Maximum burden based on 100% response	100%	33,500	1	0.086	2,885
Likely burden based on 80% response	80%	26,800	1	0.086	2,308

**A.13 Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.**

This data collection effort involves no recordkeeping or reporting costs for respondents, other than the time burden to respond to questions on the data collection instruments as described in item A.12 above. There is no known cost burden to the respondents.

It is expected that most respondents will be able answer the questions from their knowledge and involvement and there will be little or no requirement for records review or internal data collection.

**A.14 Provide estimates of annualized cost to the Federal government.**

The total amount for this research effort is estimated to be \$130,000 (based on an 80 percent response).

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

This submission to OMB is a new request for approval; there is no change in burden.

**A.16 For collections of information whose results will be published, outline plans for tabulation and publications.**

This information collection request focuses on a web-based survey of renewable energy capacity within all PHAs and MFHs. Specifically, the survey will target conventional (low-income) public housing agencies (~3,100), and FHA-insured, HUD-assisted (subsidized), and Section 202/811 multifamily properties (~30,000). The specific use of the data collected through these surveys is described below.

Following data cleaning and production of an analysis file of the web surveys data, the research team will produce a report describing frequencies and descriptive statistics on the answers to each of the survey questions. For numerical answers, the team will produce means, medians, and distributions.

After reviewing those tables, the research team will define categories and data filtering rules in order to produce cross tabulations that provide a comprehensive picture of the renewable energy capacity within HUD's housing stock.

A separate report may also be produced that includes case studies documenting the success and benefits that some agencies and properties have experienced with renewable energy systems. This report will be published by HUD and available to the public.

**A.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.**

The Department is not seeking approval to not display the expiration date on the information collection documents.

**A.18 Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I, Certification for Paperwork Reduction Act Submission.**

This submission describing data collection requests no exceptions to the certification statement identified in Item 19 of OMB Form 83-I, Certification for Paperwork Reduction Act Submission.