

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. <input type="checkbox"/> None b. <input checked="" type="checkbox"/> None 2577-XXXX	
3. Type of information collection: (check one) a. <input checked="" type="checkbox"/> New Collection b. <input type="checkbox"/> Revision of a currently approved collection c. <input type="checkbox"/> Extension of a currently approved collection d. <input type="checkbox"/> Reinstatement, without change , of previously approved collection for which approval has expired e. <input type="checkbox"/> Reinstatement, with change , 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: Transfer and Consolidation of Public Housing Programs			
8. Agency form number(s): (if applicable) None			
9. Keywords: Public Housing, Transfer, Consolidation, Public Housing Agency, Housing Authority			
10. Abstract: Public housing agencies (PHAs) that want to transfer all or part of their public housing programs, developments, and units to one or more other PHAs, and two or more PHAs that want to consolidate their public housing programs into one PHA submit a request package to HUD. This package provides HUD with the information needed to make a determination regarding approval of the request.			
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. <input checked="" type="checkbox"/> Not-for-profit institutions		12. Obligation to respond: (mark primary with "P" and all others that apply with "X") a. <input checked="" type="checkbox"/> Voluntary b. <input checked="" type="checkbox"/> Required to obtain or retain benefits c. Mandatory	
13. Annual reporting and recordkeeping hour burden: a. Number of respondents 3,140 b. Total annual responses 10 Percentage of these responses collected electronically 100% c. Total annual hours requested 1520 d. Current OMB inventory 0 e. Difference (+,-) f. Explanation of difference: 1. Program change: 2. Adjustment:		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. <input checked="" type="checkbox"/> Application for benefits b. Program evaluation c. General purpose statistics 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 checked="" 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 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: Kevin J. East Phone: (202) 402-3384	

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.

Signature of Program Official:

Date:

Milan M. Ozdinec, Deputy Assistant Secretary, Office of Public Housing and Voucher Program

Signature of Senior Officer or Designee:

Date:

Colette Pollard, Departmental Records Management Officer,
Office of the Chief Information Officer

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification

1. Public housing agencies (PHAs) are state-chartered entities, authorized for Federal funding under Section 3 of the United States Housing Act of 1937 (“the Act,” 42 USC 1437f) and funded with Federal funds as authorized by Section 9 of the Act. A State, or other properly delegated local authority, such as a city, county, or parish, may periodically act to (1) turn the public housing programs, developments, and units of one PHA over to one or more other PHAs; or (2) combine two or more PHAs into one, multijurisdictional PHA. Because such changes impact all areas of PHA operations and administration, including funding, financial and program audits, assessments, systems, data and files, legal matters, grant awards, contract authority, compliance with civil rights related requirements, and financing requirements, HUD must review these requests and ensure PHAs and HUD take various actions to effectuate the transfer or consolidation. The actions to effectuate, as applicable, include, but are not limited to (1) perfection of security interests in the public housing properties, (2) continued use of the housing units as public housing, (3) execution of Annual Contribution Contracts (ACCs), and (4) accurate payments of Federal funding to the proper PHA.
2. HUD will use the information collected to review the action after which PHAs and HUD will take the necessary actions to finalize the transfer or consolidation. As applicable, PHAs, for example, will: (1) execute new ACCs and amendments, (2) execute grant amendments and Declarations of Trust, (3) take corrective actions to resolve civil rights, environmental or labor infractions, notify residents, (4) provide financial information and close out audits; and (5) make necessary changes to property and tenant and other record in HUD data systems. HUD will, as applicable, modify assessment and funding systems to ensure proper assessments and funding, and provide required documents for execution.
3. PHAs will submit the required documents to HUD electronically.
4. There is no duplication of information as the information required to request a PHA transfer or consolidation is not otherwise available
5. The information being collected has no significant impact on small businesses or other small entities.
6. If the information is not collected, HUD cannot regulate, assess, monitor and fund PHAs in accordance with the Act, implementing regulations and other guidance.
7. There are no special circumstances that require the collection of information to be inconsistent with the guidelines in 5 CFR § 1320.6.
8. HUD published a Notice of Proposed Information Collection for Public Comments in the *Federal Register*, Volume 79; No. 12; Page 3217, on January 17, 2014. The public was given until March 18, 2014, to submit comments on the proposed information collection. HUD received no comments on this proposed collection.
9. No payments or gifts are provided.
10. All of the documents in this information collection, other than banking and financial documents are public documents recorded in units of local government, at the State level, or maintained at HUD. PHA financial and banking documents that show account numbers, any bank or business enterprise account balances are maintained confidentially in accordance with HUD’s regulatory and administrative standards.
11. No sensitive questions are being asked.

12. Of the approximately, 3,140 PHAs operate public housing programs, HUD estimates there will be a total of five (5) transfers or consolidations in any given calendar year. In each “action,” HUD estimates there will be two participant PHAs.

Accordingly, the annual burden hour estimate is based on two PHA respondents in each “action” with each of the PHAs having 350 public housing units.

Total Burden Hour Estimates for PHAs

Action	Number of Respondents	Frequency of Requirement*	X	Est. Avg. Time for Requirement (Hours)	=	Est. Annual Burden (Hours)
3 Transfers	6	1		120		720
2 Consolidations	4	1		200		800
Totals	10			320		1520

* The frequency shown assumes that the receiving or consolidated PHA makes one submission for all other PHAs involved in either the transfer or consolidation.

Total Estimated Annual Costs to Respondents

	Number of Respondents	Total Burden Hours	X	Hourly Rate	=	Annualized Cost
PHA Submissions	10	1520		\$33.41*		\$50,783

* Hourly cost for response assuming a GS-12, Step 1 (\$69,497), Analyst or Manager, hourly rate is \$33.41.

13. There are no additional costs to respondents.
14. The estimated annualized cost to the federal government, based on a GS-13, Step 1 rate are provided below. A GS-13 Step 1 is the average salary for all HUD staff who will review and approve PHA requests for transfers and consolidations.

Total Estimated Annual Costs to the Federal Government

	Number of Respondents	Total Burden Hours	X	Hourly Rate	=	Annualized Cost
PHA Submissions	10	2,250		\$39.73 *		\$89,393

* Hourly cost for response assuming a GS-13, Step 1 (\$82,642), Analyst or Manager; hourly rate is \$39.73.

15. This is a new information requirement.
16. None of the information collected will be published.
17. The OMB collection approval expiration date will be displayed.
18. There are no exceptions.

B. Collections of Information Employing Statistical Methods

Not applicable.