

## **Justification for changes to HUD-50075-ST, 50075-HCV, 50075-SM-HP Forms.**

The Office of Public and Indian Housing is requesting minor revisions to forms the Office of Management and Budget (OMB) approved in May of 2013, in order to have them conform to HUD regulations and guidance. HUD did not issue the forms OMB approved in May 2013 due to: 1) expectations that the final Capital Fund Rule de-coupling CFP form submissions from the PHA Plan templates would soon be issued and create confusion for PHAs about when forms were due and what forms were required to be submitted with PHA Plans, 2) management concerns about whether the burden of PHA Plan submissions could be reduced given HUD's efforts to eliminate the Plan requirements legislatively, 3) internal deliberations about whether the requirement for PHAs administering less than 550 public housing units and Housing Choice Vouchers to submit the form HUD-50075-QA complied with the burden relief provided through the Housing and Economic Recovery Act's (HERA) Small PHA Paperwork Reduction Act of 2008, and 4) a further proofreading and editing of the details of each form to ensure a thorough match of the form language with the PHA Plan and other existing or emerging program regulations and requirements (e.g. RAD conversions, units removed from inventory for modernization purposes). The basis for and/or a summary of the current proposed changes is outlined below:

**Definitions**, page 1 of all forms – The Definitions were revised and/or modified to conform to the PHA Plan regulations within 24 CFR 903, the Capital Fund Program Final Rule published October 24, 2013, and proposed guidance on the availability of new and revised Public Housing Agency (PHA) Five-Year and Annual Plan templates and other forms.

**Section B.2- New Activities**, page 2 of all forms, except the Streamlined Annual Plan for Housing Choice Voucher (HCV) Only PHAs and the Five-Year Plan. The addition of the activity "Conversion of Public Housing to Project-Based Assistance under RAD" was necessary to conform to the requirements of HUD Notice PIH-2012-32 (HA). The activity "Units with Approved Vacancies for Modernization" was added as a result of the decoupling of the Capital Fund Plan from the PHA plan. Further, 24 CFR § 990.145 requires that this activity be included in a PHA's Annual Plan.

**Purpose Statement** - A statement explaining the purpose and benefits of the Annual and 5-Year PHA Plans was added to the cover page of each form except the 5-Year PHA Plan template.

**Significant Amendment/Substantial Deviation (5-Year Plan)** – This component is also required for 5-Year PHA Plans and was added to the template, including an add-on that units taken off-line for modernization activities requires that PHAs amend their plans.

**Removal of Forms** – Due to the publication of the Capital Fund Rule, the forms 50075.1 and 50075.2 are approved, but no longer needed as part of the submission of a PHA Plan. Such forms are needed, however for separate submissions of documents necessary for PHAs to obtain annual CFP funding. HUD's intent is for the burden hours for these forms to be transferred to the Capital Fund Program information collection at a later date.

**Other Form Changes** - Other minor changes to the subject forms and accompanying instructions are illustrated in the redline versions of the forms provided in the supplemental documents section to this change request. These redline forms show the differences between the forms approved in May 2013 and the proposed revisions to the forms submitted with this change request.