# **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.  XXXX-XXXX b. ⊠ None
<ul> <li>3. Type of information collection: (check one)</li> <li>a. New Collection</li> <li>b. Revision of a currently approved collection</li> <li>c. Extension of a currently approved collection</li> <li>d. Reinstatement, without change, of previously approved collection for which approval has expired</li> <li>e. Reinstatement, with change, of previously approved collection for which approval has expired</li> <li>f. Existing collection in use without an OMB control number</li> <li>For b-f, note item A2 of Supporting Statement instructions.</li> </ul>	4. Type of review requested: (check one)  a.
7. Title: Title: Voucher Management System (VMS) 8. Agency form number(s): HUD-52681, HUD-52681-B, HUD-5267	2, HUD-52673, HUD 52663.
and management functions performed by the Financial Management (Public and Indian Housing and the Real Estate Assessment Center (PI monitor and manage the Public Housing Agency (PHAs) use of vouch budget implementation. The VMS collects PHAs' actual cost data that	ystem (VMS), voucher program, Section 8, Section Eight information management needs of the Housing Choice Voucher (HCV) Program Center (FMC) and the Financial Management Division (FMD) of the Office of H-REAC). This system's primary purpose is to provide a central system to ners and expenditure of program funds, and is the base for budget formulation and tenables HUD to perform and control cash management activities; the costs rance disbursements in a timely manner, and reconciliations for overages and
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. X Not-for-profit institutions  g. P State, Local or Tribal Government	12. Obligation to respond: (mark primary with "P" and all others that apply with "X")  a. Voluntary  b. <b>X</b> Required to obtain or retain benefits  c. <b>P</b> Mandatory
13. Annual reporting and recordkeeping hour burden:  a. Number of respondents  b. Total annual responses  28,99  Percentage of these responses collected electronically  c. Total annual hours requested  d. Current OMB inventory  e. Difference (+,-)  f. Explanation of difference:  1. Program change:  2. Adjustment:	a. Total annualized capital/startup costs b. Total annual costs (O&M)
15. Purpose of Information collection: (mark primary with "P" and all others that apply "X")  a. Application for benefits b. Program evaluation c. General purpose statistics d. Audit  (mark primary with "P" and all others that apply "B" and "P" and all others that apply "P" and "P"	a. Recordkeeping b. Third party disclosure
17. Statistical methods:  Does this information collection employ statistical methods?  Yes x No	18. Agency contact: (person who can best answer questions regarding the content of this submission)  Name: Bernice Unland and Debra Hamblin  Phone: (202) 402-7383 and (515) 284-4499

## 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;

Signature of Program Official:

Office of the Chief Information Officer

- (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.

Date:

X Milan M. Ozdinec, Deputy Assistant Secretary, Office of Public Housing and Voucher Programs, PIH, HUD	
Signature of Senior Officer or Designee:	Date:
X Colette Pollard, Departmental Records Management Officer,	

## **Supporting Statement for Paperwork Reduction Act Submissions**

## 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. The Housing Choice Voucher (HCV) Program is the federal government's major program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Since housing assistance is provided on behalf of the family or individual, participants are able to find their own housing, including single-family homes, townhouses and apartments. The participant is free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects.

HCVs are administered locally by public housing agencies (PHAs). The PHAs receive federal funds from the U.S. Department of Housing and Urban Development (HUD) to administer the voucher program. The Voucher Management System (VMS) is HUD's main data system in terms of supporting program management. HUD uses VMS data as submitted by the PHAs to recalculate program renewal funding for each PHA each calendar year, to calculate the administrative fees earned by PHAs, to monitor program performance, to anticipate potential problems such as funding shortfalls at particular PHAs, and to inform research on various aspects of the program. Due to new statutory and regulatory rules and guidance, new program management needs, and the need to clarify past reporting guidelines, HUD is requesting approval for several additions and changes to the VMS reporting requirements to which all PHAs operating the HCV Program are subject. Without approval, HUD will not be able to collect new data crucial to funding calculation, program oversight, etc., and PHAs will continue to submit incorrect data in fields that need clarification, furthering hampering HUD's management and oversight efforts regarding the HCV Program.

Authorities for the information collection under this PRA are: USHA of 1937 (42 U.S.C. 1437 et.seq); Housing and Community Development Act of 1987 (42 U.S.C. 3543); Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d); Fair Housing Act (42 U.S.C. 3601-19); Section 904 of the Section 904 of the Stewart B. McKinney Homeless Assistance Amendments Act of 1988, as amended by Section 903 of the Housing and Community Development Act of 1992 and Section 3003 of the Omnibus Budget Reconciliation Act of 1993 (42 U.S.C. 3544).

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.** The requested information requirements (how, by whom and for what purpose the information is to be used) for the voucher program consists of the following:

### **Information Collections Required of PHAs**

Financial Forms, HUD- 52672, 52681, 52681-B, 52663 and 52673. Originally, the HCV Financials were included in OMB Collection 2577-0169. Regulatory References 982.157 and 982.158. PHAs that administer the HCV program are required to maintain financial reports in accordance with accepted accounting standards in order to permit timely and effective audits. The HUD-52672 (Supporting Data for Annual Contributions Estimates Section 8 Housing Assistance Payments Program) and 52681 (Voucher for Payment of Annual Contributions and Operating Statement Housing Assistance Payments Program) financial records identify the amount of annual contributions that are received and disbursed by the PHA and are used by PHAs that administer the five-year Mainstream Program, MOD Rehab, and Single Room Occupancy. Form HUD-52663 (Suggested Format for Requisition for Partial Payment of Annual Contributions Section 8 Housing Assistance Payments Program) provides for PHAs to indicate requested funds and monthly amounts. Form HUD-52673 (Estimate of Total Required Annual Contributions Section 8 Housing Assistance Payments Program) allows PHAs to estimate their total required annual contributions. The required financial statements are similar to those prepared by any responsible business or organization.

The automated form HUD-52681-B (Voucher for Payment of Annual Contributions and Operating Statement Housing Assistance Payments Program Supplemental Reporting Form) is entered by the PHA into the Voucher Management System (VMS) on a monthly basis during each calendar year to track leasing and HAP expenses by voucher category,

as well as data concerning fraud recovery, Family Self-Sufficiency escrow accounts, PHA-held equity, etc. The inclusion, change, and deletion of the fields mentioned below will improve the allocation of funds and allow the PHAs and the Department to realize a more complete picture of the PHAs' resources and program activities, promote financial accountability, and improve the PHAs' ability to provide assistance to as many households as possible while maximizing budgets. In addition, the fields will be crucial to the identification of actual or incipient financial problems that will ultimately affect funding for program participants. The automated form HUD-52681-B is also utilized by the same programs as the manual forms.

#### Fields with changes/updates:

**CURRENT CHANGES IN GENERALLY ACCEPTED ACCOUNTING PRINCIPLES AS PROMULGATED BY THE GASB** - GASB Statement No. 63, *Financial Reporting of Deferred Outflows of Resources, Deferred Inflows of Resources, and Net Position*, which establishes guidance for reporting deferred outflows of resources, deferred inflows of resources, and net position in a statement of financial position is effective for financial statements with fiscal year ends of 12/31/2012 and after. Cash management became effective as of January 1, 2012. As it relates to cash management and GASB Statement No. 63, one of the major changes is the use of new required terminology. Specifically, Net Restricted Assets under GASB Statement No. 63 will be now referred to as Net Restricted Position; Unrestricted Net Assets will be referred to as Unrestricted Net Position.

Unrestricted Net Assets (UNP (FORMERLY UNA)): The industry groups and PHAs have asked for clarification for reporting this field, as a similar balance must be reported to HUD in the FASS system as part of the annual audit submission. The current definition in the VMS User's Manual requires the PHA to report the UNP (FORMERLY UNA) as the amount in the Memo Accounts on line 11170 of the Income Statement. This field may not accurately represent the PHA's UNP (FORMERLY UNA) balance as it could include the amount on line 508.1, Invested in Capital Assets, Net of Related Debt , which are not liquid or nearly liquid assets available to the PHA to operate their program. In order to provide the proper the guidance the definition is revised to state that the UNP (FORMERLY UNA) reported is line 512.4, Unrestricted Net Assets on Balance Sheet.

Revised Name: One Year Mainstream 1 – MTW (currently known as 1 Year Mainstream): Per Notice 2011-32, PHAs are requested to consolidate the reporting of MS1 and NED HAP and Leasing information and report in the NED field only. MTW PHAs require separate fields to capture this information separately by sub-program for purposes of calculating Administrative Fees. This field will be used to capture MS1 data for MTW PHAs only.

Revised Name: Non-Elderly Disabled 2008/Forward – MTW (currently known as Non-Elderly Disabled 2008/2009): Per Notice 2011-32, PHAs are requested to consolidate the reporting of MS1 and NED HAP and Leasing information and report in the NED field only. MTW PHAs require separate fields to capture this information separately by subprogram for purposes of calculating Administrative Fees. This field will be used to capture NED data for MTW PHAs only.

Revised Name: Non-Elderly Disabled - Non MTW (replaces fields formerly known as 1 Year Mainstream and Non-Elderly Disabled 2008/2009): Per Notice 2011-32, PHAs are requested to consolidate the reporting of MS1 and NED HAP and Leasing information and report in the NED field only. This field will be used to capture NED and MS1 data for all non-MTW PHAs.

Revised Name: Family Unification Pre 2008 – MTW (formerly known as 2008-2009 FUP and Family Unification): Per Notice 2011-52, PHAs are requested to consolidate the reporting of all FUP HAP and Leasing information and report in one FUP field. MTW PHAs must continue to separate their pre-2008 FUP information for purposes of calculating Administrative Fees. This field will be used to capture all pre 2008 FUP information for MTW PHAs only.

Revised Name: Family Unification 2008/Forward - MTW (formerly known as 2008-2009 FUP and Family Unification): Per Notice 2011-52, PHAs are requested to consolidate the reporting of all FUP HAP and Leasing information and report in one FUP field. MTW PHAs must continue to separate their pre-2008 FUP information for purposes of calculating Administrative Fees. This field will be used to capture all 2008 and forward FUP information for MTW PHAs.

Revised Name: Family Unification - Non MTW (formerly 2008-2009 FUP and Family Unification): Per Notice 2011-52, PHAs are requested to consolidate the reporting of all FUP HAP and Leasing information and report in one FUP field. This field will be used to capture all FUP information for non-MTW PHAs.

In summary of the above:

At present there are the following HAP and Leasing fields, for all PHAs:

One-Year Mainstream

Non-Elderly Disabled 2008/2009

Family Unification

Family Unification 2008/2009

Henceforth there will be the following HAP and Leasing fields for non-MTW PHAs:

Non-Elderly Disabled - Non MTW

Family Unification – Non-MTW

Henceforth there will be the following HAP and Leasing fields for MTW PHAs:

One-Year Mainstream – MTW

Non-Elderly Disabled 2008/Forward – MTW

Family Unification pre-2008 – MTW

Family Unification 2008/Forward - MTW

NRP (revision): Add the collection of VASH NRP (formerly NRA) to NRP (formerly NRA) field. This additional reporting will actually reduce the burden hours of the PHA as they have been required to maintain separate balances. This revision will also ensure consistent reporting between the VMS and FASS. In addition to the inclusion of the VASH NRP (formerly NRA) balances, effective 1/1/12 PHAs should no longer include the interest earned in this balance as those funds will not become a part of their NRP (formerly NRA) balance but instead will be returned to Treasury.

#### **New Fields:**

Rental Assistance Demonstration Component 1 – Leasing: Need to capture the UMLS and HAP Expenses for this new category due to its implementation. This is per notice PIH 12-32

Rental Assistance Demonstration Component 1 - HAP Expenses: Need to capture the UMLS and HAP Expenses for this new category due to its implementation.

Rental Assistance Demonstration Component 2 - Leasing: Need to capture the UMLS and HAP Expenses for this new category due to its implementation. This is per notice PIH 12-32

Rental Assistance Demonstration Component 2 – HAP Expenses: Need to capture the UMLS and HAP Expenses for this new category due to its implementation.

Project-Based Vouchers Under HAP Contract, Unleased: VMS categories capture vouchers under lease; this field is needed to collect data on project-based units that are under HAP contract but are <u>not</u> leased for the month being reported, because PHAs are eligible to earn administrative fees for the related vouchers and they are currently not reported.

Number of PBVs under AHAP

Number of PBVs under HAP and leased

Number of PBVs under HAP not leased with vacancy payments

Family Unification 2008/Forward HAP Expenses After the First of the Month – MTW: Currently all HAP costs incurred for period after the first of the month are reported in a single field of that name; those costs incurred by MTW agencies are needed separately as they are used for the renewal calculations while the other costs after the first of the month typically are already covered by the MTW block grant.

Non-Elderly Disabled 2008/Forward HAP Expenses After the First of the Month – MTW: Currently all HAP costs incurred for period after the first of the month are reported in a single field of that name; those costs incurred by MTW

agencies are needed separately as they are used for the renewal calculations while the other costs after the first of the month typically are already covered by the MTW block grant.

VASH HAP Expenses After the First of the Month – MTW: Currently all HAP costs incurred for period after the first of the month are reported in a single field of that name; those costs incurred by MTW agencies are needed separately as they are used for the renewal calculations while the other costs after the first of the month typically are already covered by the MTW block grant.

One Year Mainstream After the First of the Month – MTW: Currently all HAP costs incurred for period after the first of the month are reported in a single field of that name; those costs incurred by MTW agencies are needed separately as they are used for the renewal calculations while the other costs after the first of the month typically are already covered by the MTW block grant

Family Unification Pre-2008 After the First of the Month – MTW: Currently all HAP costs incurred for period after the first of the month are reported in a single field of that name; those costs incurred by MTW agencies are needed separately as they are used for the renewal calculations while the other costs after the first of the month typically are already covered by the MTW block grant

MTW Fields: MTW PHAs are permitted to expend HAP funds for eligible non-HAP expenses. Currently VMS has no reporting fields for these expenses. The fields identified below represent the most common uses of HAP funds for non-HAP expenses and will be added to capture this data. Under cash management procedures, each PHA's advance of funds on the first of the month is based on HAP expenses reported in VMS only. These same fields will be used by the PHAs off-line to request additional funds each month for their non-HAP expenses. For both reporting costs and requesting funds advances, each field will have a comment box:

MTW – HCV Administrative Expenses: HAP funds used to support PHA costs of administering the HCVP will be reported here

MTW – Public Housing Rehabilitation Expenses: HAP funds used to support public housing rehabilitation expenses will be reported here

MTW – Debt Service Repayment Expenses: HAP funds used to support debt service repayment expenses will be reported here

MTW – Development Activities: HAP funds used to support for PHA housing development activities will be reported here

MTW – Local Housing Program Expenses: HAP funds used to support other local housing program expenses will be reported here

MTW – Other (PHA to identify the type of expense incurred): PHA will identify other specific uses of HAP funds, reporting the type of use and the cost

MTW – Other (PHA to identify the type of expense incurred): PHA will identify other specific uses of HAP funds, reporting the type of use and the cost

MTW – Other (PHA to identify the type of expense incurred): PHA will identify other specific uses of HAP funds, reporting the type of use and the cost

Unspent Fund Source (HCV, CAP, OP, MTW)

Type Of Account

Activity

Funds Committed

Type Of Commitment

**Date Of Commitment** 

**Funds Obligated** 

Type Of Obligation

Date Of Obligation

Funds Expended From Commitment/Obligation

Projected Date Of Full Expenditure

Sandy Field: this is for informational purposes only as it only impacts one PHA.

**Deletions:** The following fields are no longer needed and will be removed in order to continue streamlining the VMS input process and minimize the burden hours on the PHAs:

Temporary Housing Units to HCV Conversion - UMLs Temporary Housing Units to HCV Conversion – HAP

(The Following fields constitute the entire Disaster tab):

DVP Families Assisted – UMLs
DVP Families Assisted - New This Month
DVP Homeless Families Assisted – UMLs
DVP Homeless Families Assisted - New This Month
DVP – HAP
DVP Homeless Families - HAP

DHAP (DHAP Katrina/Rita) Families Assisted – UML, DHAP (DHAP Katrina/Rita) Families Assisted – HAP DHAP (DHAP Katrina/Rita) Families Assisted - New This Month

DHAP-Ike Families Assisted (Ike/Gustav) – UML, DHAP-Ike Families Assisted (Ike/Gustav) – HAP, DHAP-Ike Families Assisted - New This Month – UML, DHAP-Ike Families Assisted - New This Month – HAP, DHAP-Ike Utility Deposits Paid – HAP DHAP-Ike Security Deposits Returned – HAP DHAP-Ike Utility Deposits Returned – HAP

Non-KDHAP Portable Units Administered – UML Non-KDHAP Portable Units Administered – HAP

- 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, 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. Financial Form HUD-52681-B has been automated; submissions are manually keyed to the data entry forms monthly and electronically uploaded to VMS.
- **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.** Due to the separation of the HCV financials from collection 2577-0169, this information may be found within its original collection of 2577-0169 it's approved changes are publically available.
- 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. No.
- **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.** The burden associated with Parts 982 and 983 is the minimum needed for program monitoring and implementation and incorporates program applications for funding, program financial reporting, and contractual and other documents necessary to program administration and implementation. The information cannot be collected less frequently because it is either (1) information necessary for HUD to carry out its budget, allocation, oversight, and cash management functions or (2) information necessary for PHAs to comply with contractual arrangements or a statutory mandate.
- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner. PHAs will submit data in the VMS for each month, but will submit the data after the end of each month. Validation

will occur online as the PHA prepares its submission. Items that fail specified edit checks will be immediately identified and the PHA will review and either correct or confirm the data.

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.

HUD published a Notice of Proposed Information Collection in the *Federal Register*, Volume 80, No. 71, page 20009 on April 14, 2015. The public was given until June 15, 2015 to submit comments on the proposed information collection. HUD received no comments on this proposed collection.

- **9.** Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees. No payments or gifts to respondents are provided.
- **10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy.** N/A. Information collected does not apply to individuals or any information covered by the Personal Identifiable information covered under the Privacy Act of 1974 (U.S.C. 552.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 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. N/A. VMS does not collect any such information.
- 12. Provide estimates of the hour burden of the collection of information.

Description	Number of	Responses	Total Annual	Hours per	Total Hours	Regulatory
	Respondents	per	Responses	Response		Reference
	1	Respondent	1			
Financial Forms (HUD- 52681-B)	2,350	12	28,200	2	56,400	982.157, 982.158
Financial Forms (HUD- 52672)	190	1	190	1.5	285	982.157, 982.158
Financial Form (HUD-52681)	190	1	190	1.5	285	982.157, 982.158
Financial Form (HUD-52673)	190	1	190	1.5	285	982.157, 982.158
Financial Form (HUD-52663)	190	1	190	1.5	285	982.157, 982.158
Totals	3,110		28,960		57,540	

**Estimated annual cost.** 57,540 hours times average hourly costs of \$30 = \$1,726,200.

3,110 PHAs x \$30 per hour for PHA staff members inputting information

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). None

### 14. Provide estimates of annualized cost to the Federal government.

Estimated annualized cost is \$30 per hour, based on the 2014 General Pay Scale for a GS-11 Step 1, which represents the HUD field staff reviewing required information into VMS.

#### **Federal Government Costs**

Financial Forms	57,540	\$30.00	\$1,726,200
Financial Forms	57,540	\$30.00	\$1,726,200

- 15. Explain the reasons for any program changes or adjustments reported in Items 13 and 14 of the OMB Form 83-I. N/A
- 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. Information will be published to HUD.gov
- 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 seeking approval to avoid displaying the OMB expiration date.
- 18. Explain each exception to the certification statement identified in item 19. N/A
- **B.** Collection of Information Employing Statistical Methods:

Section B is not applicable since statistical methods are not used.