
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:

X
Milan Ozdinec, Deputy Assistant Secretary, Office of Public Housing and Voucher Programs
Office of Public and Indian Housing

Signature of Senior Officer or Designee:

Date:

X
Colette Pollard, Departmental Paperwork Reduction Act Officer,
Office of the Chief Information Officer

**Supporting Statement for Paperwork Reduction Act Submissions
Public Housing Agency Plans: OMB Control No. 2577-0226**

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.**

Section 511 of the Quality Housing and Work Responsibility Act of 1998 (P.L. 105-276, 112 Stat. 2461), enacted October 21, 1998 (referred to as the “Public Housing Reform Act”) added Section 5A to the U.S. Housing Act of 1937 [42 U.S.C. 1437 *et seq*; see 1437c-1] that created a requirement that all public housing agencies (PHAs) develop public housing agency plans, consisting of a 5-Year Plan and an Annual Plan. The 5-Year Plan describes the mission of the agency and the agency’s long-range goals and objectives for achieving its mission over the subsequent 5 years. The Annual Plan provides details about the agency’s immediate operations, program participants, programs and services, and the agency’s strategy for handling operational concerns, residents’ concerns and needs, programs and services for the upcoming fiscal year.

Subsequent implementation of the PHA Plan, in accordance with Section 5A [42 U.S.C. 1437c-1(k)], allowed for submission of streamlined plans by high-performing PHAs, small PHAs with less than 250 public housing units that are not designated as troubled, or PHAs that only administer tenant-based assistance and do not own or operate public housing.

HUD’s most recent action in October 2015 was to post a version of this collection which OMB approved as a full revision incorporating public comments in 2013, and with minor changes in late 2014. Public commenters urged HUD to return to earlier multiple versions of PHA Plan templates by specific PHA type instead of a “One-Size Fits All” form. With this current proposed information collection, HUD intends to further modify the HUD-50075-5Y, HUD-50075-ST, HUD-50075-SM, HUD-50075-HCV, HUD-50075-HP templates and HUD-50077 Civil Rights, PHA Plan, Related Regulations, and Consistency with State/local Consolidated Plan certifications in the following manner as needed without a major overhaul as was done for the 2013 approval:

- 1) Additional instructions will be provided to PHA’s planning to convert all ACC units to Project-Based Assistance under RAD resulting in the removal of all ACC units from the PHAs public housing inventory. These PHA’s will be required to provide a plan for disposition of remaining public housing property,
- 2) Incorporated reference to the ‘Sample PHA Plan Amendment’ found in Notice PIH-2012-32, into the Significant Amendment Instructions.
- 3) Modify all forms as needed to reference or otherwise address the new requirements of the Affirmatively Furthering Fair Housing (AFFH) final rule, 80 FR 42271, published in the Federal Register on July 16, 2015.
- 4) Re-introduce as a part of the templates, “Challenged Elements,”
- 5) Remove obsolete references to OMB circulars located in select certification forms that were replaced by OMB’s Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 CFR 200,
- 6) Expand the instructions and template to correct typos as well as missing and incorrect information the current templates,
- 7) Replacing the 50077 form with customized versions to align with streamlined requirements of 24 CFR 903.

Finally, due to the de-coupling of Capital Fund Program activities from PHA Plan submissions, the HUD-50075.1 and HUD-50075.2 Capital Fund Annual Statement/Performance and Evaluation Report and 5-Year Action Plan forms and associated burden hours (10,070) will be removed from the approval for the PHA Plan under OMB no. 2577-0226 and added to the approval for the Capital Fund Program under OMB no. 2577-0157

- 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 from the current collection.**

The PHA Plan ensures that the public housing agency (PHA) is accountable to the local community for choices it makes relative to the housing needs of low-income, very low income, and extremely low-income families. The information is collected from local, regional, or State public housing agencies who receive funds to operate Federal public housing or Section 8 tenant based-assistance (voucher) programs and transmitted to HUD via the Internet for the purpose of providing a comprehensive source document by which the Department, public housing residents, participants in the tenant-based assistance program, and other members of the public, can monitor the basic PHA policies, rules and requirements concerning the PHA’s operations, programs and services (24 CFR 903.3).

- 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.**

The information collection requirements covered by this submission require Non-Qualified and Qualified PHAs to download the consolidated 5-Year and Annual Plan template form HUD-50075, and related forms from HUD's PHA Plan website, fill out the information (5-Year Plan only for Qualified PHAs), attach additional information and certification forms as required, and transmit the documents by mail or electronically with scanned signatures, but electronic submission is encouraged to their local HUD Field Office for review/approval. HUD manually converts a submitted PHA Plan into a uniform readable format and posts it to an internal HUD website so appropriate field offices can review the PHA Plan for compliance. Approved PHA Plans are posted on the HUD website.

- 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.**

The information collected in a 5-Year and Annual PHA Plan is not collected elsewhere. The 5-Year PHA Plan is a narrative of a PHA's mission, goals, and objectives for serving the needs of low, very-low, and extremely-low income families and needs of child and adult victims of domestic violence as required by the Violence Against Women Act (VAWA). Annual PHA Plans include an inventory of the PHA's policies and programs set forth in an abbreviated, but comprehensive format. Current efforts are underway to encourage PHAs to align their five year planning cycle and fiscal year with that of the local jurisdiction's Consolidated Plan and analyses of fair housing impediments in order to achieve more integrated planning across the board.

- 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.**

Public and Indian Housing programs typically define small PHAs as those with less than 250 public housing units or Housing Choice Vouchers. Section 3 [42 U.S.C. 1437a] defines a PHA to mean any State, county, municipality, or other governmental entity or public body (or agency or instrumentality thereof) which is authorized to engage in or assist in the development or operation of public housing. Sections 2701 and 2702 of the Small PHA Paperwork Reduction Act, Title VII of the Housing and Economic Recovery Act (HERA) of 2008, (Public Law 110-289, H.R. 3221) provide Qualified PHAs an exemption from the requirement in Section 5A of the United States Housing Act of 1937, (the Act) to prepare and submit an Annual PHA Plan, including related statements of capital improvements and supersedes the existing regulations on the PHA Plan, 24 CFR § 903, to the extent those regulations require the submission of an Annual PHA Plan by **all** PHAs. A Qualified PHA is defined by HERA as follows:

A public housing agency meeting the following requirements: (1) the sum of public housing dwelling units administered by the agency and the number of vouchers under Section 8(o) of the Act is 550 or fewer and (2) the agency is not designated as troubled under section 6(j) (2) and does not have a failing score under the Section Eight Management Assessment Program (SEMAP) during the prior 12 months.

With the passage of HERA and the Small PHA Paperwork Reduction Act, for purposes of PHA Plans, the universe of "small" PHAs is expanded to those that manage 550 or fewer such units. This collection significantly reduces administrative and paperwork burdens and associated costs for Qualified PHAs which represent approximately 73% of the PHAs that administer public housing programs. Section 2702 of HERA exempts Qualified PHAs from the preparation and filing requirements for the PHA Annual Plan, requiring only the submission of the 5-Year PHA Plan once every five years, unless there are any interim changes to the goals, objectives, and policies of the PHA. Qualified PHAs submit only the 5-Year PHA Plan, and Civil Rights certification, establish one or more Resident Advisory Boards (RAB) and consider their comments and recommendations, and conduct an annual public hearing to discuss changes to the goals, objectives, and policies of the agency, even if the PHA does not propose any changes. The currently revised HUD-50075 forms have been developed into separate versions to reflect only the submission requirements of various types of PHAs, e.g. standard, troubled, small, high performing, and Section 8 or HCV Only. Notwithstanding HERA, the existing regulations in 24 CFR Parts 903.11 and 903.12 permitting submission of streamlined plans still stand. Therefore, HUD has replaced the previous version of the single form HUD-50075, used by all PHAs, with versions of the form that contain only those elements required for submission by PHA type, and eliminate the need for PHAs to read through all elements and accompanying instructions to find those that are applicable.

Accordingly, the Annual PHA Plan submission requirements can be divided into three groups: 1) Standard plan formats for larger PHAs and PHAs designated as troubled, 2) Streamlined plans for small PHAs with less than 250 public housing units and any number of vouchers when combined is greater than 550 units (non-HERA eligible), and 3) Qualified PHAs with 550 or fewer public housing units and vouchers combined.

Standard and Troubled PHAs will complete and submit the 5-Year PHA Plan template (50075-5Y) and submit it every five years unless there are any interim changes to the goals, objectives, and policies of the PHA. Standard and Troubled PHAs will complete the standard Annual PHA Plan template 50075-ST, which includes information on all annual plan components, but retains the feature of the previous template allowing PHAs to identify and submit information only on certain elements that have changed since the last annual plan submission and describe new activities planned for the coming year.

Small PHAs with less than 250 public housing units and any number of vouchers, which when combined exceeds 550 units (non-HERA qualified) will submit the streamlined annual plan template, 50075-SM, which requires reporting of fewer annual plan elements when 5-year PHA Plans are also due, and permits PHAs to certify and describe which plan elements changed from the previous annual plan submission for all other submission years.

Section 8 or HCV Only PHAs that administer more than 550 vouchers will complete and submit the 5-Year PHA Plan template (50075-5Y) and submit it every five years unless there are any interim changes to the goals, objectives, and policies of the PHA. Section 8 or HCV Only PHAs complete the Annual PHA Plan template 50075-HCV, which includes submission of only those annual plan components that are applicable to administration of the Housing Choice Voucher program.

Qualified PHAs will complete the 5-Year PHA Plan template (50075-5Y) and submit it every five years unless there are any interim changes to the goals, objectives, and policies of the PHA. Qualified PHAs will also submit each year the Civil Rights Certification (50077-CR) to confirm their compliance with the civil rights and Resident Advisory Board (RAB) consultation requirements. .

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.

Collection of this information is mandated by statute. The majority of the information collected represents an abbreviated and comprehensive inventory of the policies PHAs employ in their management of public housing and Housing Choice Vouchers that are a routine part of the PHAs day-to-day operations.

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

- **requiring respondents to report information to HUD more than quarterly;**
- **requiring respondents to prepare a written response to a collection of information fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any documents; or**
- **requiring respondents to retain records for more than three (3) years.**

None of the special circumstances above apply to this information collection. The currently proposed form HUD-50075 has been customized into separate versions for use by various types of PHAs – Qualified, high performing, small, standard, troubled, and Section 8 or HCV Only PHAs, Non-Qualified, and troubled.

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. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

This information collection was announced in the *Federal Register*, Volume 80, page 72097, on November 18, 2015. One comment was received from outside the agency via letter expressing views related to the data elements to be recorded in light of the Affirmatively Furthering Fair Housing Final Rule published July 16, 2015. To continue the effort at streamlining and reducing PHA burden, HUD has respectfully declined the commenters request to re-introduce the full list of PHA policy documents as part of the PHA Plan process and require that PHA's list all fair housing goals identified in the local entitlement

jurisdiction's most recent AI or AFH when applicable. However, HUD has agreed and made changes to include in all plan templates, a new section requiring PHA's to provide a statement on strategies and actions for implementation of the goals and priorities as outlined in an approved Assessment of Fair Housing (AFH).

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

No payment or gifts to respondents is involved.

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

The PHA plans submitted to HUD are public information and do not lend themselves to confidentiality.

11. Provide additional justification for any questions of a sensitive nature, such as 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.

The PHA plans are not of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB form 83-I.**

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.

The estimated burden, based on the number of respondents, frequency of response, and annual burden is summarized in the following table:

Form HUD-50075-ST	Number of Respondents	Frequency of Responses	Estimated Annual Burden Hours Per Respondent	TOTAL Annual Burden Hours All Respondents	Total Responses
SECTION A PHA Information, Inventory, Submission Type	183	1	0.06	11	183
SECTION A PHA Consortia	2	1	0.5	1	2
SECTION B Annual Plan Elements:	183	1	2.6	476	183
<ul style="list-style-type: none"> • Statement of Housing Needs and Strategy for Addressing Housing Needs 					
B.1. Revision of PHA Plan Elements	183	1	2	366	183
<ul style="list-style-type: none"> • Deconcentration Policy • Financial Resources • Rent Determination • Operation and Management • Grievance Procedures • Homeownership Programs • Community Service Programs • Safety and Crime Prevention • Pet Policy • Asset Management • Substantial Deviation • Significant Amendment/Modification 					
B.2 New Activities	183	1	2	366	183
<ul style="list-style-type: none"> • Hope VI • Mixed-Finance • Demolition and Disposition • Designated Housing • Conversion of Public Housing to Tenant-Based Assistance • Conversion of Public Housing to Project-Based Assistance under RAD • Occupancy by Over-Income Families • Occupancy by Police Officers • Non-Smoking Policies • Use of Project-Based Vouchers • Units with Approved Vacancies for Modernization. • Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants) 					
B.3 PHA Certifications of Compliance with the PHA Plan and Related Regulations including Required Civil Rights Certifications	183	1	0.1	18	183
Form HUD-50077-ST-HCV-HP					
B.4 Most Recent Fiscal Year Audit	183	1	0.5	92	183
B.5 Progress Report	183	1	0.5	92	183
B.6 Resident Advisory Board Comments	183	1	0.5	92	183
B.9 Form HUD-50077-SL Certification by State or Local Officials	183	1	0.2	37	183
B.10 Troubled PHA Memorandum of Agreement	37	1	0.5	19	183
50075-ST Annual Plan Total Burden Hours	220	1	9.46	1570	183
Form HUD-50075-SM Submitted with 5-Year Plan	Number of Respondents	Frequency of Responses	Estimated Annual Burden Hours Per Respondent	TOTAL Burden Hours All Respondents	Total Responses
SECTION A PHA Information, Inventory, Submission Type	121	1	0.06	7	121
SECTION A - PHA Consortia	2	1	0.5	1	2
SECTION B	121	1	2.6	315	121

Statement of Housing Needs and Strategy for Addressing Housing Needs					
B.1. Revision of PHA Plan Elements <ul style="list-style-type: none"> • Deconcentration Policy, Waiting List Procedures, Eligibility, Selection, Occupancy, Admissions, Unit Assignment Policies • Financial Resources • Rent Determination • Homeownership Programs • Substantial Deviation • Significant Amendment/Modification 	121	1	2	242	121
B.2 New Activities <ul style="list-style-type: none"> • Hope VI • Mixed-Finance • Demolition and Disposition • Conversion of Public Housing to Tenant-Based Assistance • Conversion of Public Housing to Project-Based Assistance under RAD • Project-Based Vouchers • Units with Approved Vacancies for Modernization. • Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants) 	121	1	2	242	121
B.3. Progress Report	121	1	0.5	61	121
SECTION C - See below Form HUD-50075-SM Submitted in Years 1-4			0	0	
SECTION D - Other Document or Certification Requirements for Annual Plan Submissions. Required in ALL submission years. D.1. Civil Rights and Other Certifications Form HUD-50077- CRT-SM, PHA Certifications of Compliance with the PHA Plans and Related Regulations including Civil Rights and PHA Plan Elements that Have Changed	121	1	0.2	24	121
D.2 Resident Advisory Board Comments	121	1	0.5	61	121
D.3. Form HUD-50077-SL, Certification by State or Local Officials,	121	1	0.2	24	121
SECTION E - Reference to most recently approved CFP 5-Year Action Plan (HUD-50075.2)	121	1	0.2	24	121
50075-SM Annual Plan in 5th Year	121	1	8.76	1001	121
TOTAL BURDEN HOURS					
Form HUD-50075-SM Submitted in Years 1-4	Number of Respondents	Frequency of Responses	Estimated Annual Burden Hours Per Respondent	TOTAL Burden Hours All Respondents	Total Responses
SECTION C - Annual Plan Elements Submitted in Years 1-4 C.1. New Activities <ul style="list-style-type: none"> • Hope VI • Mixed-Finance • Demolition and Disposition • Conversion of Public Housing to Tenant-Based Assistance • Conversion of Public Housing to Project-Based Assistance under RAD • Project-Based Vouchers • Units with Approved Vacancies for Modernization. • Other Capital Grant Programs 	121	1	2	242	121

(i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants)					
C.2. Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan <i>Form HUD-50077-CRT-SM, PHA Certifications of Compliance with the PHA Plans and Related Regulations including Civil Rights and PHA Plan Elements that Have Changed</i>	121	1	1	121	121
SECTION D - Other Documents Required for ALL Annual Plan Submissions D.1. Civil Rights and Other Certifications <i>Form HUD-50077-CRT-SM, PHA Certifications of Compliance with the PHA Plans and Related Regulations including Civil Rights and PHA Plan Elements that Have Changed</i>	121	1	0.2	24	121
D.2. Resident Advisory Board Comments	121	1	0.5	61	121
D.3. Form HUD-50077-SL, Certification by State or Local Officials,	121	1	0.2	24	121
SECTION E - Statement of Capital Improvements. Reference to most recently approved CFP 5-Year Action Plan (HUD-50075.2)	121	1	0.2	24	121
50075-SM Annual Plan in Years 1-4	121	1	4.1	496	121
TOTAL BURDEN HOURS					
Form 50075-SM Annual Plan All Years	121	1	5	605	121
AVERAGE ANNUAL TOTAL BURDEN HOURS (4.1*4 +8.76/5)					
Form HUD-50075-HP	Number of Respondents	Frequency of Responses	Estimated Annual Burden Hours Per Respondent	TOTAL Annual Burden Hours All Respondents	Total Responses
SECTION A PHA Information, Inventory, Submission Type	369	1	0.06	22	369
SECTION A PHA Consortia	2	1	0.5	1	2
SECTION B Statement of Housing Needs and Strategy for Addressing Housing Needs	369	1	2.6	959	369
B.1. Revision of PHA Plan Elements <ul style="list-style-type: none"> • Deconcentration Policy • Financial Resources • Rent Determination • Homeownership Programs • Safety and Crime Prevention • Pet Policy • Substantial Deviation • Significant Amendment/Modification 	369	1	2	738	369
B.2 New Activities <ul style="list-style-type: none"> • Hope VI • Mixed-Finance • Demolition and Disposition • Designated Housing • Conversion of Public Housing to Tenant-Based Assistance • Conversion of Public Housing to Project-Based Assistance under RAD • Use of Project-Based Vouchers • Units with Approved Vacancies for Modernization. • Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants) 	369	1	2	738	369

B.3. Progress Report	369	1	0.5	185	369
B.4 Most Recent Fiscal Year Audit	369	1	0.5	185	369
SECTION C - Other Documents and/or Certification Requirements C.1. Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. C.2 Civil Rights Certification Form HUD-50077-ST-HCV-HP, <i>Certification of Compliance with PHA Plans and Related Regulations</i> . This form must be submitted by the PHA as an electronic attachment to the PHA Plan.	369	1	0.2	74	369
C.3 Resident Advisory Board Comments	369	1	0.5	185	369
C.4 Form HUD-50077-SL Certification by State or Local Officials	369	1	0.2	74	369
SECTION D - Statement of Capital Improvements. Reference to most recently approved CFP 5-Year Action Plan (HUD-50075.2)	369	1	0.2	74	369
50075-HP Annual Plan Total Burden Hours	369	1	9.26	3235	369
Form HUD-50075-HCV	Number of Respondents	Frequency	Estimated Annual Burden Hours Per Respondent-	TOTAL Burden Hours All Respondents	Total Responses
SECTION A - PHA Information, Inventory Submission Type	240	1	0.06	14	240
SECTION A - PHA Consortia	2	1	0.5	1	2
SECTION B - Annual Plan B.1. Revision of PHA Plan Elements • Waiting List Procedures, and Eligibility, Selection, Occupancy, and Admissions • Financial Resources • Rent Determination • Operation and Management • Informal Reviews and Hearings • Homeownership Programs • Self Sufficiency Programs • Treatment of Income Changes Resulting from Welfare Program Requirements • Substantial Deviation • Significant Amendment/Modification	240	1	2.5	600	240
B.2. Most Recent Fiscal Year Audit	240	1	0.5	120	240
B.3 Civil Rights Certification Form HUD-50077, <i>Certification of Compliance with PHA Plans and Related Regulations</i>	240	1	0.2	48	240
B.4 Form HUD-50077-SL Certification by State or Local Officials of PHA Plan Consistency with Consolidated Plan	240	1	0.2	48	240
B.5 Progress Report	240	1	0.5	120	240
B.6 RAB Comments (24 CFR 903.13 b(3)) Where tenant-based assistance is 20% or more of assisted families	240	1	0.5	120	240
50075-HCV Annual Plan TOTAL BURDEN HOURS	240	1	4.96	1071	240
Form HUD-50075-5Y	Number of Respondents	Frequency of Responses	Estimated Annual Burden Hours Per Respondent	TOTAL Burden Hours All Respondents	Total Responses
SECTION A - PHA Information, Inventory Submission Type	3819	1	0.06	229	3819
SECTION A - PHA Consortia	8	1	0.5	4	8
SECTION B - Mission, Goals and Objectives, Progress Report, and Violence Against Women Act			0	0	

B.1 Mission	3819	1	0.5	1910	3819
B.2 Goals and Objectives	3819	1	2	7,638	3819
B.3 Progress Report	3819	1	1	3819	3819
B.4 VAWA Goals	3819	1	1	3819	3819
B.5 Significant Amendment or Modification	3819	1	1	3819	3819
B.6 RAB Comments	3819	1	1	3819	3819
B.7 Form HUD - 50077-SL Certification by State or Local Officials of Consistency with Consolidated Plan	3819	1	0.2	764	3819
B.8 Challenged Elements	3819	1	0.5	1910	3819
SECTION C - Affirmatively Furthering Fair Housing			0	0	
C.1 Statement of PHA's strategies and actions for implementation of the goals and priorities as outlined in an approved Assessment of Fair Housing (AFH).	3819	1	2	7,638	3819
5-Year Plan - TOTAL BURDEN HOURS	3819	1	9.76	37,273	3819
5-Year Plan - TOTAL ANNUAL BURDEN HOURS BURDEN HOURS/5	3819	1	1.95	7,455	3819
TOTAL ANNUAL BURDEN HOURS ALL FORMS and WEIGHTED AVG. ANNUAL BURDEN HOURS ALL PHAs for ANNUAL TEMPLATES	3819	1	7.63	14,937	3819

Total Annual Burden Hours for all PHAs for all PHA Plan Templates: 14,937

Calculation of Total Annual Burden Hours: Sum of Annual Plan burden hours for all PHA Plan templates + Average Annual Burden Hours for 5-Year PHA Plan (Total burden hours divided by five-year covered period).

Weighted Average Annual Burden Hours all PHAs for Annual Templates: 7.63 (sum of % of Total PHAs represented by each type of PHA multiplied by annual burden hours for each PHA template type).

Burden Hours by Type of Template	Template Universe/Total # of PHAs	Percent of Total	Applied to Burden Hours	Weighted Average Burden Hours
9.46	220/950	.23	.23 x 9.46	2.17
5	121/950	.127	.127 x 5	.63
9.26	369/950	.388	.388 x 9.26	3.59
4.96	240/950	.25	.25 x 4.96	1.24
				7.63

Burden hour estimates are based on a total of 3,819 PHAs - (2,869 Qualified PHAs, 220 Standard or Troubled PHAs with more than 550 public housing units or vouchers combined, 369 High Performers and 121 Small PHAs with less than 250 public housing units and any number of vouchers that when combined exceeds 550 total units, and 240 Section 8 Only PHAs with more than 550 vouchers or with less than 551 vouchers but SEMAP-Troubled. This data was extracted from HUD's PIC Data Page on 1-19-2016. The 5-Year Plan is completed once every 5 years by all PHAs.

The burden hours reflected in the Burden Worksheet and Supporting Statement represent the average annual burden hours for PHAs to prepare and submit Annual and 5-Year PHA Plan templates, and additional certifications and documents as attachments to the PHA Plan based on such factors as the size and designation of the PHA, and the number of programs administered by the PHA. 5-Year PHA Plans and related certifications and documents only, and (7,638 hours) for Non-Qualified PHAs to complete the Qualified PHAs under HERA submit a template documenting their annual requirements each year and the 5-Year PHA Plan once every 5 years. All other PHAs submit the applicable Annual PHA Plan each year, and the 5-Year Plan every 5 years, unless significant interim changes are made, in which case the 5-Year Plan may be submitted with the Annual Plan in the year in which the changes are made.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

There is no additional cost to respondents for reporting or recordkeeping for collection of this information for the elements: (a) total capital and start-up cost; and (b) total operation and maintenance and purchase of services.

Respondents' costs were covered under the OMB approval for the standard PHA Plan at the time it was originally implemented in 1998. No proposed costs are associated with submission of a further streamlined PHA 5-Year/Annual Plan

submission. Ongoing respondent costs to file and maintain PHA Plan records, schedule public hearings, make documents available to the public, etc. may be estimated as follows:

Total Estimated Annual Costs to Respondents						
	Number of Plans	Average Annual Hours for Staff Time	X	Hourly Rate	=	Annualized Cost
Annual PHA Plan Submissions	950	2		\$23.25*		\$44,175
Five-Year PHA Plan Submissions	3,819	2		\$23.25		\$177,584
TOTAL Estimated Staff Time for Filing and Recordkeeping						4221,758

* Hourly cost for response assuming a GS-9, Step 5 (\$48,531), Executive Assistant, hourly rate is \$33.72.

14. Provide estimates of annualized costs to the Federal Government. Also provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

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.

Total Estimated Annual Costs to the Federal Government						
	Number of Plans	Average Annual Hours for Staff Time to Review and Process Plans	X	Hourly Rate	=	Annualized Cost
Annual PHA Plan Submissions	950	2		\$33.72 *		\$164,068
Five-Year PHA Plan submissions	3,819	2		\$33.72		\$257,553
TOTAL Estimated Annualized Cost						\$421,621.00

* Hourly cost for staff time to review and process annual and 5-Year PHA plans assuming a GS-12, Step 5 (\$70,381), Analyst or Manager; hourly rate is \$33.72.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB form 83-I.

With this revision to the PHA Plan information collection, HUD seeks to address new Rental Assistance Demonstration (RAD) and the Affirmatively Furthering Fair Housing (AFFH) requirements, address new regulatory requirements and include minor edits and additions which were inadvertently omitted from the prior revision of this collection. The new forms include the following features:

- Provided instructions to PHA’s with plans to remove all ACC units from its public housing inventory through RAD
- Incorporated a reference to the ‘Sample PHA Plan Amendment’ found in RAD Notice PIH-2012-32 REV-2, into the Significant Amendment Instructions.
 - o Forms HUD-50075-5Y, HUD-50075-HP, HUD-50075-SM, HUD-50075-ST

- Modified applicable forms as needed to reference or otherwise address the new requirements of the Affirmatively Furthering Fair Housing (AFFH) final rule
 - Forms HUD-50075-5Y, HUD-50075-HCV, HUD-50075-HP, HUD-50075-SM, HUD-50075-ST,
 - HUD-50077-CRT-SM, HUD-50077-ST-HCV-HP, HUD-50077-SL
 - Form HUD 50077-CR remains unchanged
- Re-introduced as a part of the templates, “Challenged Elements”
 - Forms HUD-50075-5Y, HUD-50075-HCV, HUD-50075-HP, HUD-50075-SM, HUD-50075-ST
- Removed obsolete references to OMB circulars located in select certification forms that were replaced by OMB’s Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 CFR 200
 - HUD-50077-CRT-SM, HUD-50077-ST-HCV-HP
- Expanded the instructions and template to correct typos as well as missing and incorrect information in the current templates.
 - Forms HUD-50075-HP, HUD-50075-SM, HUD-50075-ST,
- Removed the HUD-50075.1 and HUD-50075.2 Capital Fund Annual Statement/Performance and Evaluation Report and 5-Year Action Plan forms and associated burden hours (10,070) due to the de-coupling of Capital Fund Program activities from the PHA Plan submissions. The forms and burden hours will be added to the approval for the Capital Fund Program under OMB no. 2577-0157.

The total reduction in annual burden hours reflects a reduction in the current total number of PHAs or respondents from 4,053 to 3,819.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

N/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 expiration date will be displayed on the collection instrument.

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

No exceptions.

B. Collections of Information Employing Statistical Methods

This collection of information will not be used for statistical purposes.