
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

Signature of Senior Officer or Designee:

Date:

X
Colette Pollard, Departmental Reports Management Officer
Office of Chief Information Officer

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification

1. The Family Self-Sufficiency (FSS) Program is authorized under Section 23 of the United States Housing Act of 1937. The purpose of the FSS program is to develop local strategies to coordinate the use of public housing and Section 8 housing choice voucher rental assistance with support services provided by public and private resources to enable families to achieve economic independence and self-sufficiency.
2. Each Public Housing Agency (PHA) carrying-out a local FSS Program must enter into a Contract of Participation (Form HUD-52650) with each eligible family that opts to participate in the program. The contract enumerates the services of the local FSS Program that are made available to tenants, as well as the responsibilities and obligations of the participating family. The Contract of Participation is required by law (Section 23(c) of the U. S. Housing Act of 1937, as added by Section 554 of the Cranston-Gonzales National Affordable Housing Act, P.L. 101-625).

Each PHA must consult with local officials to develop an Action Plan containing descriptions of the size, characteristics, and needs of the population to be served by its proposed self-sufficiency program; the services and activities to be provided by both public and private resources to FSS families; how the program will be implemented; a time-table for implementation; a certification of coordination in the development of the services and activities; and other information necessary for HUD to determine the soundness of the PHA's proposed FSS program. The Plan will be submitted to HUD as required by law (Section 23 (g) of the U. S. Housing Act of 1937 as added by Section 554 of the Cranston-Gonzalez National Affordable Housing Act, P.L. 101-625).

PHAs must establish an FSS escrow account for each family participating in the program. The amount of the escrow credit is based on increases in the family's total tenant payment resulting from increases in the family's earned income during the term of the FSS contract. PHAs may use Form HUD-52652, FSS Escrow Account Credit Worksheet, to determine escrow credit for each participating family.

Submittal of annual reports to HUD is required by law (Section 23(1) of the U. S. Housing Act of 1937, as added by Section 554 of the Cranston-Gonzalez National Affordable Housing Act, P. L. 101-625). PHAs generally fulfill their annual FSS reporting requirements by completion of the FSS addendum to the Form HUD-50058. The burden hours for the reporting through the HUD-50058 are covered under OMB control number 2577-0083.

The application form, HUD-52651, for FSS Program Coordinator funding is necessary to ensure compliance with Section 102 of the Department of Housing and Urban Development Reform Act of 1989 (42 U.S.C. 3545) (HUD Reform Act) and the regulations codified in 24 CFR part 4, subpart A which contain provisions to ensure greater accountability and integrity in provision of assistance administered by HUD. Additional forms used in the application package are the SF-424, OMB approval # 0348-0043; SF-LLL, OMB approval # 0348-0046, and HUD-96011, OMB # 2535-0114.

3. As part of the ongoing implementation of the Electronic Government (E-Government) component of the President's Management Agenda, all application packages for funding of salaries for Housing Choice Voucher and Public Housing Family Self-Sufficiency coordinators are submitted to HUD electronically by PHAs. In addition, information from each family's Escrow Credit Worksheet, HUD-52652, and FSS Contract of Participation, HUD-52650, is submitted to HUD electronically by PHAs using the HUD-50058, Family Report.
4. There is no duplication of effort. Information collected is unique to each participant and does not duplicate any similar information.
5. The information being collected has no significant impact on small businesses or other small entities. The burden associated with such collection of information is the minimum needed for program monitoring.
6. Federal program requirements, policy activities and statutory mandates would not be met if the collection is not conducted, or is conducted less frequently. This information must be collected so that funds for the salaries of FSS coordinators may be awarded timely to qualified applicants.

7. There are no special circumstances that would cause information collection to be conducted inappropriately.
8. This information collection was announced in the *Federal Register*, Volume 78, Page 45257, on July 26, 2013. No comments were received.
9. No payment or gifts to respondents are provided.
10. Assurance of confidentiality is neither provided nor needed.
11. No sensitive questions are being asked.
12. Estimated Annual Reporting and Recordkeeping Burden

Description of Information Collection	Number of Respondents	Responses per Year	Total Annual Responses	Hrs per Response	Total Hours
SF424 - Application for Federal Assistance	1,000	1	1,000	0.75	750
SF LLL - Disclosure of Lobbying Activities	40	1	40	0.17	7
HUD 2880- Applicant/Recipient/Disclosure/Update Form (OMB No. 2510-0011)	1,000	1	1,000	0	0
HUD 96011 - Facsimile Transmittal (OMB No. 2535-0118)	1,000	1	1,000	0	0
HUD-2991 - Certification of Consistency with the Consolidated Plan (OMB No. 2506-0112)	1,000	1	1,000	0	0
HUD 52752 - Certification of Consistency with the Indian Housing Plan	15	1	15	0.25	4
HUD-52755 - Sample Contract Admin. Partnership Agreement	40	1	40	0.17	7
HUD-2994 - A You are Our Client (OMB no: 2535-0116)	750	1	750	0	0
HUD-52651 - FSS Application	1,000	1	1,000	1	1,000
HUD 96010 - Logic Model (OMB No. 2535-0114)	1,000	1	1,000	0	0
Subtotal (Application)				2.1	1,768

Action Plan	10	1	10	10	100
HUD-52650 - Contract of Participation	900	10	9,000	.25	2,250
HUD-52652 - Escrow Account Credit Worksheet	750	50	37,500	.85	31,875
HUD-1044 – Grant Agreement*	250	1	250	N/A	N/A
Annual Report (Narrative)	900	1	900	1	900
HUD 96010 - Logic Model (OMB No. 2535-0114)	900	1	900	0	0
HUD-50058 – Family Report (OMB No. 2577-0083)	900	50	45,000	0	0
Subtotal (Program Reporting/Recordkeeping)				12.1	35,125
Total				14.2	36,893

*HUD-1044, Award/Amendment is completed by HUD staff, signed by the recipient of the grant, and returned to HUD. This form is a certification and HUD ascribes no burden to its use.

Burden hours for forms showing zero burden hours in this collection are reflected in the OMB approval number cited or do not have a reportable burden.

The estimate of the total annual cost burden to respondents/recordkeepers resulting from the collection of this information is: 36,492.4 burden hours x \$28.88 per hour = \$1,053,901; assuming an hourly rate at the GS-12/Step 1 level.

13. There are no additional costs to the respondents.

14. Estimated annualized cost to the Federal Government for this collection:

	No. of Responses	Hrs. Per Response	Annual Hrs	Cost Per Hr.	Cost to Fed/yr
Action Plan	5	2	10	\$28.88*	\$289
Reporting	950	0.5	475	\$28.88	\$13,718
Funding Application	1,000	4	4,000	\$28.88	\$115,520
Total Cost					\$129,527

*Assumes an hourly rate at the GS-12/Step1 level.

15. The Department is seeking to establish an FSS collection that encompasses both the Public Housing and Housing Choice Voucher FSS programs. Because PHAs who administer the Public Housing FSS program were covered under a different collection (OMB No. 2577-0229) the Department is incorporating these PHAs and any applicable forms into this collection, and will be making appropriate revisions to OMB No. 2577-0229. Additionally, changes were made to the content of form HUD-52651, and consequently, the burden hours were increased from 0.75 to 1 hour per response.

16. The information collection results will not be published; the funded grant awards will be published as required by the HUD Reform Act.

17. The expiration date and the OMB approval number will be displayed in the Notice of Funding Availability and on all related forms.

18. There are no exceptions to the certification statement identified in item 19.

B. Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methods.