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
Public and Indian Housing

2. OMB Control Number:
a.2577-0216
b. ☐ None

3. Type of information collection: (check one)
a. ☐ New Collection
b. ☐ Revision of a currently approved collection
c. ☐ Extension of a currently approved collection
d. ☐ Reinstatement, **without change**, of previously approved collection for which approval has expired
e. ☒ Reinstatement, **with change**, of previously approved collection for which approval has expired
f. ☐ 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. ☒ Regular
b. ☐ Emergency - Approval requested by
c. ☐ Delegated

5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities?
☐ Yes ☒ No

6. Requested expiration date:
a. ☒ Three years form approval date b. ☐ Other (specify)

7. Title:
Moving to Work Demonstration

8. Agency form number(s): (if applicable)
HUD Form 50900 Elements for the Annual MTW Plan and Annual MTW Report

9. Keywords:
'Housing, public housing, public housing authorities, MTW, Moving to Work, fungible'

10. Abstract:
MTW is a long term demonstration program authorized in 1996 and recently expanded in 2016, which permits select PHAs to implement certain programmatic flexibilities to address local needs. PHAs submit application materials to HUD requesting authorization and describing their plans to implement MTW flexibilities. All PHAs are required to submit annual plans to HUD, however, PHAs with a Moving to Work demonstration designation, (39 at the time of submission of this request) must submit an Annual MTW Plan and Annual MTW Report in lieu of the standard 5-year plan and annual update. In 2013, revisions were made to this 50900 form to streamline the process of Agencies submitting required Annual Plan and Report Data to HUD so that the Department is able to better respond to Congressional and other inquiries regarding outcome measures obtained and promising practices learned throughout the duration of the demonstration. This 2016 revision of the Form makes a variety of minor refinements to improve clarity and usability, based on the experiences of HUD and PHAs with the form over the last 3 years. The form is also being updated also to implement provisions of the Department's affirmatively furthering fair housing (AFFH) rule (24 CFR 5.150-5.180).

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. Not-for-profit institutions
e. Farms
f. Federal Government
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. **P** Required to obtain or retain benefits
c. Mandatory

13. Annual reporting and recordkeeping hour burden:

a. Number of respondents	89
b. Total annual responses	518
Percentage of these responses collected electronically	100%
c. Total annual hours requested	5680
d. Current OMB inventory	4320
e. Difference (+,-)	
f. Explanation of difference	
1. Program Change: 0	
2. Adjustment:	+1360

14. Annual reporting and recordkeeping cost burden: (in thousands of dollars)

a. Total annualized capital/startup costs	0
b. Total annual costs (O&M)	
c. Total annualized cost requested	
d. Total annual cost requested	
e. Current OMB inventory	
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. **X** Application for benefits
b. **X** Program evaluation
c. General purpose statistics
d. Audit
e. **P** Program planning or management
f. Research
g. **X** Regulatory or compliance

16. Frequency of recordkeeping or reporting: (check all that apply)
a. ☐ Recordkeeping b. ☐ Third party disclosure
b. ☒ Reporting:
1. ☐ On occasion 2. ☐ Weekly 3. ☐ Monthly
4. ☐ Quarterly 5. ☐ Semi-annually 6. ☒ Annually
7. ☐ Biannually 8. ☐ Other (describe)

17. Statistical methods: Does this information collection employ statistical methods? ☐ Yes ☒ No	18. Agency contact: (person who can best answer questions regarding the content of this submission) Name: Alison Smith Phone: (202) 402-6231

19. Certification for Paperwork Reduction Act Submissions

On behalf of this Federal Agency, 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.

Marianne Nazzaro, MTW Director

Signature of Program Official: X Dominique Blom, Deputy Assistant Secretary, Office of Public Housing Investments	Date:
Signature of Senior Officer or Designee: X Colette Pollard, Departmental Reports Management Officer Office of the Chief Information Officer	Date:

Supporting Statement for Paperwork Reduction Act Submissions

Information Collection:

A. Justification

1. The following information collections are required to administer the MTW program.

All public housing authorities (PHA) are required to submit a five (5) year plan and annual plans as stated in Section 5A of the 1937 Act, as amended; however, for PHAs with specific types of Moving to Work (MTW) demonstration agreements (39 at the time of submission of this request) the Annual MTW Plan and Annual MTW Report are submitted in lieu of the standard annual and 5 year PHA plans.

The MTW Demonstration was authorized under Section 204 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996 (Public Law 104-134, 110 Stat 1321), dated April 26, 1996. The original MTW Demonstration statute permitted up to 30 PHAs to participate in the demonstration program. Nineteen PHAs were selected for participation in the MTW demonstration in response to a HUD Notice published in the Federal Register on December 18, 1996 and five of the 30 slots were filled through the Jobs-Plus Community Response Initiative.

Additional MTW 'slots' have been added by Congress over time through appropriations statutes. Two PHAs were specifically named and authorized to join the demonstration in 1999 under the VA, HUD, and Independent Agencies Appropriations Act of 1999 (Pub L. 105-276, 112 Stat. 2461), dated October 21, 1998. A Public and Indian Housing Notice (PIH Notice 2000-52) issued December 13, 2000 allowed up to an additional 6 PHAs to participate in the MTW demonstration. The Consolidated Appropriations Act, 2008 (Pub L. 110-161, 121 Stat. 1844) added four named PHAs to the Moving to Work demonstration program.

Subsequent appropriations Acts for 2009, 2010, and 2011 authorized a total of 12 additional MTW slots. As part of HUD's 2009 budget appropriation (Section 236, title II, division I of the Omnibus Appropriations Act, 2009, enacted March 11, 2009), Congress directed HUD to add three agencies to the MTW program. As part of HUD's 2010 budget appropriation (Section 232, title II, division A of the Consolidated Appropriations Act, 2010, enacted December 16, 2009), Congress authorized HUD to add three agencies to the MTW demonstration. In 2011, Congress again authorized HUD to add three MTW PHAs pursuant to the 2010 Congressional requirements.

A Standard MTW Agreement (Standard Agreement) was developed in 2007, and was transmitted to the existing MTW agencies in January, 2008. As additional MTW PHAs were selected they too were provided with the Standard Agreement. All 39 existing MTW agencies operate under this agreement, which authorizes participation in the demonstration through each agency's 2018 fiscal year. HUD is currently working on an extension of the Standard Agreement to 2028, as required by the Consolidated Appropriations Act, 2016.

Under the Standard Agreement, all MTW sites are authorized to combine their operating, modernization and housing choice voucher funding into a single "block" grant. Because they cannot conform with the requirement for the regular PHA annual and 5 year plans, and because HUD requires different information from these PHAs for program oversight purposes, these sites are required to submit an annual MTW Plan and an annual MTW Report in accordance with their MTW Agreement, in lieu of the regular PHA annual and 5 year plans.

Through the MTW Annual Plan and Report, each MTW site will inform HUD, its residents and the public of the PHA's mission for serving the needs of low-income and very low-income families, and the PHA's strategy for addressing those needs. The MTW Annual Plan, like the Annual PHA Plan, provides an easily identifiable source by which residents, participants in tenant-based programs, and other members of the public may locate policies, rules, and requirements concerning the PHA's operations, programs, and services.

Revisions are being made to this 50900 form to improve its usability and to address minor issues identified by HUD and the MTW PHAs over time.

The appropriations act in 2016 authorized an additional 100 MTW slots and additional slots may be added through future appropriations acts. Eligible applicants interested in obtaining MTW designation are required to submit applications to HUD, as explained in the applicable HUD Notice. The information collection covers the information needed from applicants to determine which applicants should be selected. The information provided demonstrates the applicants' plans to implement a local MTW program, and includes related applicant history. The application includes such information as narrative exhibits, certifications, data forms, and supporting documentation. The information will be used by HUD staff to evaluate threshold requirements and review applications.

2. How, by whom, and for what purpose the information collection is to be used

A current listing of the 39 active MTW sites can be found on the Public and Indian Housing website at http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/ph/mtw/history. The 2009, 2010 and 2011 Appropriations included language to add an additional 3 agencies in each year. Participating MTW sites will submit both a hard copy and an electronic version. After submission copies of the documents are distributed to headquarters and field staff who participate in the monitoring and evaluation of the MTW demonstration. As indicated above, the information collection is used to provide a framework for local accountability and to the extent possible, an easily identifiable source by which public housing residents, housing choice voucher participants, and other members of the public may locate basic PHA policies, rules and requirements concerning its operations, programs and services, as well as planned changes to policies, procedures and activities for the coming year.

3. Technology applied to the collection:

Under the Standard Agreement, the MTW agencies will submit electronic copies (one to headquarters, one to the field office) of the Annual MTW Plan and Report to HUD annually. After receipt, MTW Plans and Reports are posted to the MTW Website within the PIH HUD Website. Applications will be submitted electronically.

4. Duplication of Effort:

There is no duplication of effort. Information collected is unique to this collection and to each PHA and does not duplicate any similar information or method.

5. Impact on Small Business and Small Entities:

This information collection has no impact on small businesses or other entities.

6. Consequence of Less Frequent Collection:

The 1996 Appropriations Act requires each PHA participating in MTW to keep records and submit reports to HUD that document the PHA's use of program funds, provide data to assist HUD in assessing the MTW demonstration, and describe and analyze the effect of the PHA's activities in addressing the objectives of the PHA's MTW plan. This information collection permits HUD to track the use of Federal funds spent by MTW Demonstration sites and to monitor this complex demonstration.

The Federal statutory mandate contained in Section 204 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996 (Public Law 104-134, 110 Stat 1321), dated April 26, 1996 would not be met if the collection were not conducted. The information collection is necessary to the continuation of the MTW program and so that the available funds are used to meet the stated purpose of the MTW Demonstration.

7. Special Circumstances for Information Collection:

There are no special circumstances that would cause this information collection to be conducted more often than quarterly, in fewer than 30 days, or more than one hard-copy original and two electronic copies.

- requiring respondents to report information to the agency more than quarterly;
  Not Applicable
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
  Not Applicable
- requiring respondents to submit more than an original and two copies of any document;
  Not Applicable
- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
  Not Applicable
- in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of the study;
  Not Applicable
- requiring the use of statistical data classification that has not been reviewed and approved by OMB;
  Not Applicable
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
  Not Applicable
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.
- **Not Applicable**

8. Federal Register Notice and Public Comments:

This information collection was announced in the *Federal Register*, Volume 81, Page 10647, on March 01, 2016. The public was given until May 02, 2016, to submit comments on the proposed information collection. HUD received various comments on this proposed collection.

9. Payment/Gifts to Respondents:

No payments or gifts are provided to respondents for any of this information collection.

10. Assurances of Confidentiality:

The Annual MTW Plan and Report and application submitted to HUD are public information and do not lend themselves to confidentiality.

11. Questions of a Sensitive Nature:

No sensitive questions are being asked for in the MTW plans and reports.

12. Estimate of Annual Burden Hours for Information Collection:

We estimate that costs to the respondents to complete this information collection will not exceed those incurred by regular grant administration, planning and management and may bring a cost savings to the respondents.

The chart below outlines the burden associated with the various aspects of the MTW application, plan and reports. Each of the items listed is a category within the list of items that must be submitted for the MTW plans and reports. All elements are included in the plan and the report. In the plan the PHA outlines the approaches that they will be utilizing during the new fiscal year and include any data or information appropriate to explain their plans, then the report draws directly from the plan when the PHA outlines their actual experiences and accomplishments during the year and explains any differences between the plan submission and the reported accomplishments.

	Respondents	Annual responses/ Respondent	Total responses per year	Burden per year per Respondent	Total burden hours	Cost Burden
Program Information						
Application	50	1	50	20	1000	$17,000
50900 "Annual MTW Plan and Report Elements"						
Introduction	39	2[1]	78	1	78	$1,326
General Housing Authority Information	39	2*	78	8	624	$10,608
Proposed MTW Activities	39	1[2]	39	37	1443	$24,531
Ongoing MTW Activities	39	2*	78	15	1170	$19,890
Sources and Uses of Funding	39	2*	78	8	624	$10,608
Administrative	39	2*	78	7[3]	546	$9,282
Certifications of Compliance	39	1[4]	39	5	195	$3,315
Total Burden	**89 total**	**varies**	**518**	**81**	**5,680**	**$96,560**[5]

13. Cost Burden of Information Collection:

There is no cost burden to respondents aside from the time burden referenced in 12 above.

14. Annualized Cost to Federal Government:

We do not estimate that there will be any additional costs to the Federal government for any of

[1] Submits 2 responses each year: once in Annual MTW Plan, once in Annual MTW Report
[2] Submits 1 response each year: once in Annual MTW Plan
[3] MTW Agencies do not have to submit HUD form 50077, Plan certification, and elements of this form have been included in this collection process and the total number of burden hours has been adjusted accordingly.

[4] Submits one response each year: in Annual MTW Report
[5] 4680 hours times average hourly cost of $17 = $79,560

this information collection. Staff assigned to review the MTW plan and report would have previously been reviewing the five (5) year plan and standard PHA plan for each of these sites. The average grade for the staff working on MTW is GS-14, and they spend approximately 10 hours reviewing and exchanging information with the sites for each plan and report. This translates to 10 hours for 39 reports and 39 plans (780 hours) at the average wage of a GS-14 - $46.45 per hour (step 5). Total cost = $36,231.

15. Changes or Adjustments to OMB Form 83-I:

This is a reinstatement, with change, of a previously approved collection. Through this reinstatement HUD is adjusting the total burden hours estimate to incorporate 3 additional PHAs that have been added since the last approval of this Form and additional applicants to the program resulting from the 2016 appropriations act. This 2016 reinstatement of the Form also makes a variety of minor refinements to improve clarity and usability, based on the experiences of HUD and PHAs with the Form over the last 3 years. Examples of these minor refinements include: additional entries in the "General Information" section to improve clarity, elimination of the requirement to submit tables in multiple formats, layout improvements to sections/tables to improve readability, and text corrections to improve term consistency. The form is also being updated also to implement provisions of the Department's affirmatively furthering fair housing (AFFH) rule (24 CFR 5.150-5.180).

As stated above, all PHAs are required to submit a five (5) year plan and annual plans as required by Section 5A of the 1937 Act, as amended, however, MTW PHAs submit the MTW annual plan and annual report in lieu of the standard annual and 5 year PHA plans. OMB approval for an alternate submission was sought and approved and the current 50900 form expires on December 31, 2011. However, at this time in the demonstration it is necessary to update the form to provide more uniform data collection across agencies. This will assist ingathering the most accurate, comparable data so the Department is able to better respond to Congressional and other inquiries regarding outcome measures obtained and promising practices learned throughout the duration of the demonstration. Through the revised form, respondents will report outcome information to accurately evaluate the effects of MTW policy changes on residents, the agency's operations and the local community.

16. Publication of Information Collection Results:

Information collection results are not tabulated and published in the traditional sense, however, plans and reports are converted to Adobe Acrobat files and posted to the Moving to Work web site on an ongoing basis, as they are submitted.

17. Expiration Date:

The OMB approval number and date will appear on the HUD-prescribed forms.

18. Exceptions to Certification Statement:

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

B. Collections of Information Employing Statistical Methods

There are no collections of information that employ statistical methods.