
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: Dominique Blom, Deputy Assistant Secretary Office of Public Housing Investments, PI X	Date:
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Signature of Senior Officer or Designee: X Colette Pollard, Departmental Records Management Officer, Office of the Chief Information Officer	Date:
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Supporting Statement for Paperwork Reduction Act Submissions

A. Justification:

1. Why is this information necessary?

The Department has recognized the need for improving energy efficiency in affordable housing and has prioritized this in Agency Priority Goal # 4, Measure # 13. The energy efficiency data collected through EPIC gives the Department a more comprehensive dataset regarding energy efficiency.

The EPIC data system will gradually automate the collection of the five-year plan and annual statement forms from grantees. These are required forms presently collected in hard copy on Forms 50075.1 and 50075.2 under collection OMB control number 2577-0226. These forms also collect data on the eventual, actual use of funds; this data will be gradually collected electronically through the EPIC data system as well. Electronic collection will enable the Department to aggregate information about the way grantees are using Federal funding. Additionally, PHA grantees will be able to submit Replace Housing Factor fund plans, the mechanism by which PHAs are allowed to accumulate special funds received based on units removed from the inventory from year to year. This information is presently collected in hard copy at the field office level; the EPIC data system will automate and centralize this collection in order to streamline the process and improve transparency.

Furthermore, the EPIC data system will be loaded with Physical Needs Assessment (“PNA”) data. This data being in the system coupled with the electronic planning process will streamline grantee planning.

The EPIC data system will collect information about the Energy Performance Contract (“EPC”) process, including the energy efficiency improvements. As the Department moves to shrink its energy footprint in spite of rising energy costs, clear and comprehensive data on this process will be crucial to its success.

Finally, the Department has prioritized in Agency Performance Goal # 2, Measure # 5 making housing more available for more families. In the light of the recent housing crisis, this goal has become simultaneously more challenging and more important. Tracking of the use of Federal funds paid through the Public Housing Capital Fund, the only Federal funding stream dedicated to the capital needs of the nation’s last resort housing option, is crucial to understanding how the Department can properly and efficiently assist grantees in meeting this goal as well as assessing the Department’s own progress. The EPIC data system will track development of public housing with Federal funds and through other means, including mixed-finance development.

2. How is the data to be used?

The Department has used the EEM data to track progress made toward Agency Priority Goal # 4, Measure 13, to improve the energy efficiency of Public Housing.

The Department will use the newly-collected data to get a real-time picture of the use of funding and the progress made toward meeting the considerable capital needs of the public housing inventory. The Department will gain a better understanding of the problem—both its nature and its scope—through the data collected in the EPIC data system. The electronic collection of the data presently collected through paper Forms 50075.1 and 50075.2 will enable the Department to follow the money from grant to capital improvement and evaluate the successes of the program. This information will bolster the Department’s justification for budget resources for the program which, hopefully, will enable grantees to assist the Department in meeting its mission.

Moreover, the improved data collection around energy efficient improvements will enable the Department to identify areas for increased savings in consumption. The EPC program, in particular, enables grantees to leverage these savings into additional funding for meeting capital needs. The Department will be able to monitor the EPC process and document the energy savings realized through the capital improvements made with the financing

arranged through it. These data points, in conjunction with the PNA data and the energy audit data, will increase transparency in public housing and create a platform for evaluating performance and identifying efficiencies.

Data collected on public housing development will be used to ensure greater accuracy of present data and will be used to identify ways PHA grantees are using both Federal and non-Federal funding sources to meet the affordable housing needs of the American public.

3. Describe whether, and to what extent, the collection of information is automated?

HUD will electronically collect the EEM information online utilizing a web-based application that will be pre-populated with data to the greatest extent possible to minimize data entry. Once the initial file is created, recipients will be able to copy the file forward for editing to the current quarter.

Other data is already collected in a hard copy. For example, PHAs wishing to engage in an EPC will be able to submit many of the required documents electronically. Much of the rest of the process will be automated through the EPIC data system as well. Information on public housing development is collected piecemeal at the field office level in hard copy; the EPIC data system will automate and centralize this data collection. Finally, the Forms 50075.1 and 50075.2 and the RHF plan will be converted from a paper submission to the field office to an electronic submission, standardized and capable of aggregation, that will still be monitored by the field office for compliance.

4. Duplication of Information

This information is not being collected elsewhere. Some of the information to be collected through the EPIC data system is collected through paper submissions presently, but the EPIC data system's electronic collection will completely replace the paper process.

5. Does the collection of information impact small businesses or other small entities?

Many of the recipients of PIH funds subject to this data collection may be small entities, such as a small Public Housing Agency ("PHA"). The impact is expected to be minimal.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

The Public Housing Capital Fund will face increased risk that funds will be misused or used inefficiently without the data collection. Moreover, the Department will be unable to assess this performance or the progress toward reduced energy costs made by PHAs without this data collection.

The Department is considering whether the data could be conducted less frequently without an increase in risk to funds or gaps in data needed to assess the programs. At this submission, the Department feels that the increased risk associated with collections less frequently than quarterly exceeds any the value in any decreased burden imposed on grantees because reporting in the last three quarters of the year involves only minor changes to the first report submitted and subsequently copied forward. The heightened risks involve a lapse of funds by grantees that have not been efficiently and effectively using funds or that these grantees will rush to expend funds on ineligible or inefficient items at the end of the period. Quarterly reporting avoids these risks by identifying potential funds control issues prior to any deadlines so the Department can provide technical assistance to the grantee.

Finally, much of the information to be collected in the EPIC data system will enable grantees to realize benefits. For example, the EPC process, the RHF plan, and the development process require certain Department approvals under the United States Housing Act of 1937.

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

- 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. Identify the date and page number of the Federal Register notice soliciting comments on the information.

This information collection was announced in the *Federal Register*, Volume 81; No. 64; Page 19234, on April 04, 2016. The public was given until June 03, 2016, to submit comments on the proposed information collection. HUD received no comments on this proposed collection.

9. Explain any payments or gifts 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.

Only summary level data will be made available to the public. The EPIC data system does not contain any personally identifiable information and does not involve the collection of any information covered by the Privacy Act. Information at the Grantee level is not sensitive and there is no need for confidentiality.

11. Justify any questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private.

The information collected does not contain questions of a sensitive nature.

12. Annual Reporting Burden

The EEM (“core activity”) data collection will cover 3,150 grantees with 12,600 active PIH grants and that will be reported in EPIC. Average time to complete the survey is 30 minutes. Respondents will be required to submit information under the core activity module quarterly. Each respondent will spend an additional 2.5 hours collecting the data required to complete the survey. The annual reporting burden hours are based on the requirement that each recipient submits a separate report for each active grant. The estimates for labor burden hours are upper limits and PIH anticipates that the actual labor burden will decrease somewhat as the grantee becomes familiar with the EPIC data collection tool. Also, quarterly updates will likely require less labor than the initial submission.

The Forms 50075.1 (the “Annual Statement” and “Performance and Evaluation” or “P&E”) and 50075.2 (the “Five Year Plan”) data will be collected. The Department anticipates each “form,” separated by function in the EPIC data system, will require 2 hours to complete, as broken out in the table below. Data suggest approximately 8,500 open grants at any given point in time for which both the Annual Statement and P&E are required. PHAs are only required to update the Five Year Plan every five years, but many PHAs do so more frequently. The Department anticipates up to 2,000 responses per year through this module. The Department anticipates 30 submittals for EPC financings per year. The hourly burden associated with this process is much higher, but participation in the process is voluntary and at the PHA’s discretion.

The Department anticipates up to 60 new developments per year. These developments may contain varying numbers of units and correspondingly different levels of funding, both Federal and non-Federal. This process also demands a greater burden, but development is at the PHA’s discretion.

The Department anticipates approximately 60 PHAs per year will submit plans through the Mixed Finance Early Warning module. This module will allow a PHA to alert the Department of its intention to propose a mixed-finance transaction as well as various deadlines associated with the non-Federal sources of financing so that the Department can provide technical assistance to the PHA in the planning process.

Pursuant to current regulations, the Department awards Capital Funds based on units removed from the inventory to PHAs for up to 10 years. These Replacement Housing Factor (“RHF”) funds can be accumulated from years 1 to 5 pursuant to an approved RHF Plan. Awards in years 6 to 10 depend upon the PHA’s performance in using the funds from the former 5 years. These funds also can be accumulated pursuant to an approved RHF Plan. Accumulation is in the discretion of the PHA, however, given that funding per unit in any given year is insufficient to replace a single unit and that the time burden associated with creating a feasible plan is relatively low, many PHAs will choose to accumulate these funds. The Department anticipates approximately 50 plans per year with each requiring 30 minutes to prepare.

	Form/ Document	No. of Respondents	Frequency	Total Responses	Hours per Response	Total Hours	Cost per hour	Total Cost
1	Core Activity	12,600	1	12,600	3.0	37,800.00	\$40	\$1,512,000.00
2	5yr plan	2,000	1	2,000	2.0	4,000	\$40	\$160,000.00
3	Annual Stmt budget	8,500	1	8,500	1.0	8,500	\$40	\$340,000.00
4	P&E	8,500	1	8,500	1.0	8,500	\$40	\$340,000.00

5	EPC	30	1	30	120.0	3,600	\$40	\$144,000.00
6	Public Housing Development	60	1	60	120.0	7,200	\$40	\$288,000.00
7	Mixed Finance Early Warning	60	1	60	0.33	19.80	\$40	\$792.00
8	RHF	50	1	50	0.5	25	\$40	\$1,000.00
					Totals	69,645		\$2,785,792.00

PIH estimates that 69,645 hours of labor per year are required for this collection. Based on an estimated labor rate of \$40.10 (GS-13 Step 5 equivalent) the annual labor cost is \$2,792,764.50. Based on the Department's experience, the projected labor burden should steadily decrease as the grantees become familiar with navigating the EPIC system and because submissions after the first reporting cycle for a grant will be an update to the initial submitted report and will require less labor to complete.

13. Additional Cost to Respondents

There are no additional costs to respondents other than what is reported in Item 12.

14. Annualized cost to the Federal Government

Estimated annualized cost for collection of information is \$2,765.00. The assumed hourly cost figure of \$40.10 is equivalent to the hourly (mid-range) salary of an experienced professional (i.e., a GS-13 Step 5 employee). The total estimated hours for the collection is 69,645 hours. The costs for this data collection are PIH project management and administration costs for individual grantees. The annualized cost is funded by the Federal government.

15. Explain any program changes or adjustments.

To reduce the burden on PHAs, HUD is now collecting Core Activity module EEM data on an annual basis rather than a quarterly basis. This reduced the number of responses per year for Core Activity from 50,400 to 12,600 and the number of hours per year from 151,200 to 37,800. The total number of responses was reduced from 69,600 to 31,800 and the total hours from 183,045 to 69,645.

This revision expands the data collected to include the amount and type of Public Housing development, including development in conjunction with Low Income Housing Tax Credits; other planning collections and performance reports presently collected in hard copy; the Physical Needs Assessment; and modernization undertaken by PHAs through Energy Performance Contracts. The EPIC data system is necessary in order to support the Department's Agency Performance Goals (APGs), specifically APG # 4, Measure # 13 which sets numeric targets for completing green retrofits and creating energy efficient units. In addition to the direct support of HUD APG # 4, Measure # 13, the implementation of the EPIC data system will enable HUD to provide reports on the progress of EEMs completed with PIH funding. The EPIC data system will also improve PHA planning by making the five-year plan and annual statement process electronic and also enabling HUD to aggregate this information in order to track APG # 2, Measure # 5, which sets goals for expanding the number of families housed. The EPIC data system will also allow improved tracking of the Energy Performance Contract process and will include the Physical Needs Assessment tool.

16. If the information will be published, outline plans for tabulation and publication.

The data will be tabulated, summarized, and published in various internal and external reports (including annual performance reports), and press releases. The data may also be used by researchers for the production of scholarly articles.

17. OMB Expiration Date

HUD is not seeking approval to avoid displaying the OMB expiration date.

18. Certification of Paperwork Reduction Act Submission

There is no exception to Item # 19 "Certification of Paperwork Reduction Act Submission."

B. Collections of Information Employing Statistical Methods.

The collection of information does not employ statistical methods.