# **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.

Agency/Subagency Originating Request:     U.S. Department of Housing and Urban Development	2. OMB Control Number: b. None
Office of Public and Indian Housing Real Estate Assessment Center	a. <b>2577-0271</b>
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  c. Delegated  5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities?  Yes X No  6. Requested expiration date:  a. Three years from approval date b. Other (specify)
7. Title: Training Evaluation Form	
8. Agency form number(s): (if applicable) HUD 50945	
9. Keywords: Training, Public Housing, Housing	
10. Abstract:	rovided to public housing agencies, the public, and other stakeholders can be stary.
11. Affected public: (mark primary with "P" and all others that apply with "X")     a. Individuals or households	12. Obligation to respond: (mark primary with "P" and all others that apply with "X")     a. P Voluntary     b. Required to obtain or retain benefits     c. Mandatory
13. Annual reporting and recordkeeping hour burden:  a. Number of respondents 64,590 b. Total annual responses 64,590 Percentage of these responses collected electronically c. Total annual hours requested 2,132 d. Current OMB inventory 2,120 e. Difference (+,-) +12 f. Explanation of difference: 1. Program change: 2. Adjustment: X	14. Annual reporting and recordkeeping cost burden: (in thousands of dollars) Do not include costs based on the hours in item 13. a. Total annualized capital/startup costs  b. Total annual costs (O&M)  c. Total annualized cost requested d. Current OMB inventory e. Difference 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. Application for benefits e. Program planning or management b. P Program evaluation f. Research c. General purpose statistics g. Regulatory or compliance d. Audit	16. Frequency of recordkeeping or reporting: (check all that apply)  a. Recordkeeping b. Third party disclosure  c. X Reporting:  1. On occasion 2. Weekly 3. Monthly  4. Quarterly 5. Semi-annually 6. Annually  7. Biennually 8. Other (describe) When training is completed.
Does this information collection employ statistical methods?	Leency contact: (person who can best answer questions regarding the content of this imission) me: Jennifer Read one: 202-475-7852

## 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:

, Departmental Reports Management Officer 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 Donald J. La Voy, Deputy Assistant Secretary Real Estate Assessment Center	
Signature of Senior Officer or Designee:	Date:
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## **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.

Executive Order 13571, "Streamlining Service Delivery and Improving Customer Service" (Exhibit A), issued April 27, 2011, provides: "The public deserves competent, efficient, and responsive service from the Federal Government. Executive departments and agencies (agencies) must continuously evaluate their performance in meeting this standard and work to improve it." Executive Order 12862, "Setting Customer Service Standards" (Exhibit B), issued on September 11, 1993, requires agencies that provide significant services directly to the public to identify and survey their customers, establish service standards and track performance against those standards, and benchmark customer service performance against the best in business. The Office of Public and Indian Housing (PIH) will use this form as a standardized way of evaluating learners' reactions to training or technical assistance programs. The information collected will allow PIH to measure, evaluate, and compare the performance of its training programs over time. The design of this form follows industry-accepted best practices, allowing additional comparisons to other training programs in business and government.

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 Training Evaluation Form (Exhibit C which includes the PRA Disclosure Statement) is a standardized from that will be used by PIH to determine how online or traditional classroom training and technical assistance programs can be improved to meet learners' needs. By using a standardized training assessment instrument that is completed at the end of a course, comparisons can be made across initiatives allowing PIH to improve the quality of all its training programs. Although the same form will be used for all types of training evaluation, for computer-based training, certain questions such as those in Section III of the form may not be displayed.

Below are some examples of how this training evaluation is currently being used and will be used.

- Uniform Physical Condition Standards (UPCS) inspection training. Prospective HUD contract
  property inspectors must successfully complete HUD UPCS training in order to inspect HUD insured
  and assisted properties. The training consists of a computer-based component followed by an
  instructor-led training session.
- Uniform Physical Condition Standards (UPCS) inspection training for property owners and agents
  (POAs). Public Housing Agency (PHA) employees and Multifamily POAs take a computer-based or
  in-person UPCS training course to become familiar with the UPCS inspection process and
  requirements, facilitating and enhancing maintenance of properties and preparation for upcoming
  contract inspections.
- Uniform Physical Condition Standards for Vouchers (UPCS-V) inspection training. The form will be used to evaluate training offered to contract inspectors who will perform Uniform Physical Conditions Standards Voucher (UPSC-V) inspections.
- Other Training. PIH will use the training form for other training offered to PIH program participants and stakeholders, like, for example, training and information on major regulatory changes. These

sessions may be in the form of technical assistance seminars, conferences, briefings, or online webinars.

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.

Respondents will voluntarily complete the training assessment form in one of two ways depending on the training. For web-based training, the form will be completed electronically at the completion of each course. For on-site seminars and technical assistance, the form will be completed manually.

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.

There is no duplication of information associated with this collection. The information obtained through the Training Evaluation Form upon completion of the trainings offered by PIH is not collected through any other feedback mechanism.

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.

The information being collected has no significant impact on small businesses or other small entities.

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.

If HUD does not administer the Training Evaluation Form, it will not be able to evaluate and improve the quality of its training programs for inspectors, PHAs, boards of commissioners, program participants, and other members of the public who take a PIH-sponsored training course.

- 7. Explain any special circumstances that would cause an information collection to be conducted 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-inaid, 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**

There are no special circumstances that require the collection of information to be inconsistent with the guidelines in 5 CFR § 1320.6.

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 for Public Comments in the <u>Federal Register</u>, Volume 81, No., 186; Page 66070, on September 26, 2016. The public was given until November 25, 2016 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 are provided to respondents.* 

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

Assurances of confidentiality are neither provided nor needed because respondents will submit this information anonymously.

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.

*No sensitive questions are being asked.* 

- 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 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; and
- 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 total estimated numbers of annual respondents is 64,590. The number of respondents for a. and b. is based on the average number of trainees per year over the past three years. The number of respondents for c. and d. is based on estimates of the number of trainees expected to be trained annually.

- a. UPCS computer-based training 660 (prospective UPCS inspectors and PHA POA employees)
- b. UPCS instructor-led training 85 (85 of the prospective UPCS inspectors will, after successfully completing the UPCS computer based training, attend UPCS instructor-led training)
- c. UPCS-V instructor-led training 5,000 UPCS-V inspectors
- d. Other training 3,923 PHAs with an average of three trainees per session, with five sessions conducted each year.

The annual burden for completing the Training Evaluation Form based on actual experience is estimated to be 2 minutes per respondent, for a total of 2,132 hours.

Training	Respondents	Number of Respondents	X	Frequency of Response	Total Responses	X	Estimated Hours	=	Total Annual Burden Hours
UPCS Web- Based	Prospective Inspector Candidates & PHA/POA Staff	660		1	660		.033		22
UPCS Instructor- Led	Prospective Inspector Candidates	85		1	85		.033		3
UPCS-V Instructor- Led	Prospective Inspector Candidates	5,000		1	5,000		.033		165
Other Training	PHA Staff and PIH Stakeholders	3,923 x 3 x 5 = 58,845		1	58,845		.033		1,942
Totals		64,590					.033		2,132

The estimated annual cost to respondents are provided in the table below and assume an administrative assistant's salary of \$51,811 per year at a GS-11/1 level rate (Salary Table 2016-GS), or an hourly rate of \$24.83.

Estimated Annual Costs to Respondents							
Number of	Number of Total Burden		Hourly	_	Annualized		
Responses	Hours	Λ	Rate	_	Cost		
64,590	2,132		\$24.83		\$52,937		

- 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). The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;
  - If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
  - Generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

*No other costs are associated with the collection of this information.* 

14. Provide estimates of annualized cost 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 expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

There is no cost to the Federal government.

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

The change in the burden hours reflects changes in the number of trainees for the different types of training for which the collection instrument will be completed.

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. 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.

This information will not be published.

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 not display the expiration date of the OMB approval. The OMB approval number and expiration date will appear on the Training Evaluation Form.

18. Explain each exception to the certification statement identified in item 19.

There are no exceptions to the certification statement identified in item 19 of the OMB 83-I.

- **B.** Collections of Information Employing Statistical Methods— You should be prepared to justify a decision not to use statistical methods in any case where such methods might reduce burden or improve the accuracy of results. When Item 17 of the OMB 83-I is checked "Yes", the following documentation should be provided to the extent that it applies to the methods proposed.
  - Describe (including a numerical estimate) the potential respondent and any sampling or other respondent selection method to be used. Data on the number of entities (e.g. establishments, State and local governmental units, households, or persons).

N/A