
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:

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

Date:

Signature of Senior Officer or Designee:

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

Date:

A. JUSTIFICATION

1. **Reason for collection.** Program regulations at 24 CFR Part 985 set forth the requirements of the Section Eight Management Assessment Program (SEMAP) that includes a certification of indicators reflecting performance similar to the Public Housing Assessment System (PHAS) for public housing. Through this assessment HUD can improve oversight of the housing choice voucher (HCV) program and target monitoring and assistance to public housing agencies (PHA) that need the most improvement and pose the greatest risk.

Authority: 42 U.S.C. 1437a, 1437c, 1437f, and 3535(d).

2. **Use of information.** On an annual basis (or every two years for small agencies) PHAs are required to submit a SEMAP certification (form HUD-52648) electronically into the Information Management System/Public and Indian Housing Information Center (IMS/PIC). There is a maximum of 15 indicators that are either verified through PIC data or an on-site or off-site confirmatory review. HUD uses the PHA's SEMAP certification, together with other available data, to assess PHA management capabilities and deficiencies, and to assign an overall performance rating to each PHA administering a HCV program. HUD rates a PHA on each SEMAP indicator, completes a PHA SEMAP profile identifying any program management deficiencies and assigns an overall performance rating. A PHA's written report of correction of a SEMAP deficiency is used as documentation that the PHA has taken action to address identified program weaknesses. Where HUD assigns an overall performance rating of troubled, the PHA's corrective action plan is used to monitor the PHA's progress on program improvements.
3. **Use of automated collection techniques.** The Department has developed the IMS/PIC for electronic submission and scoring of SEMAP certifications via the Internet. Since December 2000, PHAs have been submitting and HUD field offices have been scoring, SEMAP certifications.
4. **Efforts to identify duplication.** The information collection on the SEMAP certification does not duplicate any currently collected information.
5. **Methods to minimize the burden on small entities.** HUD published its final rule regarding the Deregulation for Small Public Housing Agencies in the Federal Register on June 24, 2003. This rule streamlines HUD's regulatory requirements for small PHAs that administer the public housing and voucher assistance programs under the United States Housing Act of 1937. The final rule deregulated the assessment and scoring of small PHAs under 250 voucher units to a biennial (every two years), rather than annual basis. In accordance with this final rule, the burden is the least necessary to accomplish the Department's purpose.
6. **Consequences if collected less frequently.** Assessing PHA program performance less than annually (or biennially for small PHAs) can result in poor performance going unchecked for longer periods and may result in more ineligible families being assisted, housing quality standards not being sufficiently monitored, or more incorrect subsidies being paid.
7. **Special circumstances.** There are no special circumstances that would cause this information collection to be conducted more than quarterly based on the fiscal year-end date of the PHA or for PHAs to submit their certifications more than annually.
 - 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. HUD published a Notice of Proposed Information Collection for Public Comments in the *Federal Register*. Volume 81; No. 161; Page 55472, on August 19, 2016. The public was given until October 18, 2016 to submit comments on the Proposed Information Collection. HUD received no comments on this proposed collection. However, any proposed changes to SEMAP will be shared with industry groups.

9. **Payment to respondents.** No payment or gift is provided to respondents.

10. **Assurance of confidentiality.** There are no assurances of confidentiality provided to respondents.

11. **Questions of a sensitive nature.** There are no questions of a sensitive nature.

12. **Estimated hour burden.** The data below changes from year to year based on the number of PHAs that are required to submit a SEMAP certification. However, the changes in the number of PHAs required to submit SEMAP certifications dropped from 2,302 to 2,207 since the last submission due to transfers and consolidations of PHAs. In addition, 40 Moving to Work PHAs were eliminated since these agencies do not have to submit SEMAP certifications. Small deregulated PHAs were included in the burden hours although they only have to submit a SEMAP certification every other year. From recent IMS/PIC data for calendar year 2015, it is estimated that approximately 80 PHAs will be troubled each year and will require a Corrective Action Plan. It is also estimated that approximately 25 percent will not be troubled, but will require a Correction of SEMAP Deficiency for a failed indicator/s.

| Information Collection | No. of Respondents | Responses Per Respondent | Total Annual Responses | Hrs per Response | Total Hrs | Regulatory Reference |
|--|--------------------|--------------------------|------------------------|------------------|---------------|----------------------|
| SEMAP Certification | 2,167 | 1 | 2,167 | 12 | 26,004 | 985.101 |
| Corrective Action Plan | 80 | 1 | 80 | 10 | 800 | 985.107(c) |
| Report on Correction of SEMAP Deficiency | 542 | 1 | 542 | 2 | 1,084 | 985.106 |
| TOTAL ANNUAL BURDEN | | | | | 27,888 | |

Estimated annualized cost to respondents. 27,888 total hours x \$20/hr. = \$557,760/ 2,167 respondents = \$257 per respondent.

13. **Estimated annual cost.** No additional cost to respondents.

14. **Annualized cost to Federal government.** None.

15. **Reasons for program changes.** There have been no program changes since the last justification submission with the exception of 95 fewer PHAs and the elimination of 40 MTW PHAs since they are not required to submit SEMAP certifications. The 80 anticipated troubled PHAs and non-troubled PHAs (25 percent) requiring a Correction of SEMAP Deficiency for a failed indicator/s has not changed.
16. **Plans for publication of information collected.** The information collection results will not be published.
17. **Approval to not display expiration date for OMB approval.** HUD is not seeking approval to avoid displaying the OMB expiration date.
18. **Exceptions to certification.** There are no exceptions to the certification statement identified in item 19, OMB 83-i.

B. COLLECTIONS EMPLOYING STATISTICAL METHODS.

The Department's collection of information for SEMAP does not employ statistical methods.

