

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.

<p>1. Agency/Sub-agency Originating Request: U.S. Department of Housing and Urban Development Office of Public and Indian Housing, Real Estate Assessment Center</p>		<p>2. OMB Control Number: a. 2577-0241 b. <input type="checkbox"/> None</p>																																			
<p>3. Type of information collection: (check one)</p> <p>a. <input type="checkbox"/> New Collection</p> <p>b. <input type="checkbox"/> Revision of a currently approved collection</p> <p>c. <input type="checkbox"/> Extension of a currently approved collection</p> <p>d. <input type="checkbox"/> Reinstatement, without change, of previously approved collection for which approval has expired</p> <p>e. <input checked="" type="checkbox"/> Reinstatement, with change, of previously approved collection for which approval has expired</p> <p>f. <input type="checkbox"/> Existing collection in use without an OMB control number</p> <p>For b-f, note item A2 of Supporting Statement instructions.</p>		<p>4. Type of review requested: (check one)</p> <p>a. <input checked="" type="checkbox"/> Regular</p> <p>b. <input type="checkbox"/> Emergency - Approval requested by</p> <p>c. <input type="checkbox"/> Delegated</p> <p>5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>6. Requested expiration date: a. <input checked="" type="checkbox"/> Three years from approval date b. <input type="checkbox"/> Other (specify)</p>																																			
<p>7. Title: Exigent Health and Safety Deficiency Correction Certification</p>																																					
<p>8. Agency form number(s): (if applicable) None</p>																																					
<p>9. Keywords: Housing, Safety, Health</p>																																					
<p>10. Abstract: Public Housing Agencies (PHAs) correct/mitigate exigent health and safety (EHS) deficiencies cited in property inspections conducted pursuant to HUD's Uniform Physical Condition Standards (UPCS) inspection protocol. Through the web-based template, PHAs electronically certify that they have corrected/mitigated the EHS deficiencies.</p>																																					
<p>11. Affected public: (mark primary with "P" and all others that apply with "X")</p> <p>a. Individuals or households e. Farms</p> <p>b. X Business or other for-profit f. Federal Government</p> <p>c. Not-for-profit institutions g. P State, Local or Tribal Government</p>		<p>12. Obligation to respond: (mark primary with "P" and all others that apply with "X")</p> <p>a. Voluntary</p> <p>b. Required to obtain or retain benefits</p> <p>c. P Mandatory</p>																																			
<p>13. Annual reporting and record keeping hour burden:</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">a. Number of respondents</td> <td style="text-align: right;">3000</td> </tr> <tr> <td>b. Total annual responses</td> <td style="text-align: right;">971</td> </tr> <tr> <td>Percentage of these responses collected electronically</td> <td style="text-align: right;">100%</td> </tr> <tr> <td>c. Total annual hours requested</td> <td style="text-align: right;">273</td> </tr> <tr> <td>d. Current OMB inventory</td> <td style="text-align: right;">346</td> </tr> <tr> <td>e. Difference (+,-)</td> <td style="text-align: right;">-73.</td> </tr> <tr> <td colspan="2">f. Explanation of difference:</td> </tr> <tr> <td> 1. Program change:</td> <td></td> </tr> <tr> <td> 2. Adjustment:</td> <td style="text-align: right;">-73</td> </tr> </table>		a. Number of respondents	3000	b. Total annual responses	971	Percentage of these responses collected electronically	100%	c. Total annual hours requested	273	d. Current OMB inventory	346	e. Difference (+,-)	-73.	f. Explanation of difference:		1. Program change:		2. Adjustment:	-73	<p>14. Annual reporting and recordkeeping cost burden: (in thousands of dollars) Do not include costs based on the hours in item 13.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">a. Total annualized capital/startup costs</td> <td style="text-align: right;">Not Applicable</td> </tr> <tr> <td>b. Total annual costs (O&M)</td> <td style="text-align: right;">\$0.00</td> </tr> <tr> <td>c. Total annualized cost requested</td> <td style="text-align: right;">\$0.00</td> </tr> <tr> <td>d. Total annual cost requested</td> <td style="text-align: right;">\$0.00</td> </tr> <tr> <td>e. Current OMB inventory</td> <td style="text-align: right;">0</td> </tr> <tr> <td colspan="2">f. Explanation of difference:</td> </tr> <tr> <td> 1. Program change:</td> <td></td> </tr> <tr> <td> 2. Adjustment:</td> <td></td> </tr> </table>		a. Total annualized capital/startup costs	Not Applicable	b. Total annual costs (O&M)	\$0.00	c. Total annualized cost requested	\$0.00	d. Total annual cost requested	\$0.00	e. Current OMB inventory	0	f. Explanation of difference:		1. Program change:		2. Adjustment:	
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<p>15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X")</p> <p>a. Application for benefits e. X Program planning or management</p> <p>b. X Program evaluation f. Research</p> <p>c. General purpose statistics g. P Regulatory or compliance</p> <p>d. Audit</p>		<p>16. Frequency of recordkeeping or reporting: (check all that apply)</p> <p>a. <input type="checkbox"/> Recordkeeping b. <input type="checkbox"/> Third party disclosure</p> <p>c. <input checked="" type="checkbox"/> Reporting:</p> <table style="width: 100%;"> <tr> <td>1. <input type="checkbox"/> On occasion</td> <td>2. <input type="checkbox"/> Weekly</td> <td>3. <input type="checkbox"/> Monthly</td> </tr> <tr> <td>4. <input type="checkbox"/> Quarterly</td> <td>5. <input type="checkbox"/> Semi-annually</td> <td>6. <input checked="" type="checkbox"/> Annually</td> </tr> <tr> <td>7. <input type="checkbox"/> Biennially</td> <td>8. <input type="checkbox"/> Other (describe)</td> <td></td> </tr> </table>		1. <input type="checkbox"/> On occasion	2. <input type="checkbox"/> Weekly	3. <input type="checkbox"/> Monthly	4. <input type="checkbox"/> Quarterly	5. <input type="checkbox"/> Semi-annually	6. <input checked="" type="checkbox"/> Annually	7. <input type="checkbox"/> Biennially	8. <input type="checkbox"/> Other (describe)																										
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<p>17. Statistical methods: Does this information collection employ statistical methods? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>		<p>18. Agency contact: (person who can best answer questions regarding the content of this submission) Name: Claudia J. Yarus Phone: (202) 475-8830</p>																																			

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 record keeping 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:

Donald J. La Voy, Deputy Assistant Secretary
Real Estate Assessment Center

Signature of Senior Officer or Designee:

Date:

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

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.

The Department's Uniform Physical Condition Standards (UPCS) regulation (24 CFR part 5, subpart G) provides that HUD housing must be decent, safe, sanitary, and in good repair. The UPCS regulation also provides that all area and components of the housing must be free of health and safety hazards.

HUD conducts physical inspections of the HUD-funded housing, and in particular public housing, to determine if the UPCS standards are being met. Pursuant to the UPCS inspection protocol, at the end of the inspection (or at the end of each day of a multi-day inspection) the inspector provides the property representative with a copy of the "Notification of Exigent and Fire Safety Hazards Observed" form. Each exigent health and safety (EHS) deficiency that the inspector observed that day is listed on the form. The property representative signs the form acknowledging receipt.

Public housing agencies (PHAs) are required to correct, remedy or act to abate EHS deficiencies within 24 hours (Public Housing Assessment System (PHAS) regulation at 24 CFR part 902.21. Exhibit A)). PHAs also are to notify the Department within three business days of the date the PHA was provided notice of these deficiencies that the deficiencies were corrected/remedied/acted on to abate within the prescribed time frame.

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.

HUD uses the data it collects to monitor compliance with regulatory requirements and to assist in ensuring the correction of EHS deficiencies on HUD assisted properties. HUD staff reviews the certifications and conducts applicable follow-up activities.

Attached is a copy of the templates PHAs complete on line, via the internet, to certify to the correction, remedy or actions taken to abate the EHS deficiencies cited in the inspection reports. (Exhibit B.) Upon completion of all of the required screens, the PHA transmits the data to HUD. The required OMB Disclosure appears when the PHAs enter the system to complete and submit the EHS Certificate.

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.

The requested data is transmitted to HUD electronically, increasing data accuracy and reducing respondent burden. Should a PHA not be able to submit this information electronically due to an administrative or cost burden, the PHA may be approved to submit the required information 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 will be no duplication of information. There is no similar information already available that could be used or modified.

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 only entities that possibly may be adversely impacted by any costs associated with HUD's electronic reporting requirement are small PHAs that do not have any, or have limited, web access and computer experience. Any possible adverse impact is lessened due to the frequency of when inspections are conducted, as set forth in Sections 902.13 of the PHAS rule. The Department has guides available on the HUD website, provides training, and offers other technical assistance on this process.

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.

PHAS requires that PHAs correct/remedy/act to abate EHS deficiencies within 24 contiguous hours of the notice of the deficiency and that PHAs certify to HUD within three business days that the EHS deficiencies have been corrected/remedied/acted upon to abate within that 24-hour period. Without this information, HUD's interest (as well as the interest of taxpayers) will be unprotected and HUD will not be able to identify the risks due to neglected maintenance of HUD assisted property. Because the deficiencies are life threatening it is in the best interest of the residents that the PHAs ensure all identified EHS deficiencies are immediately corrected/remedied/or acted on to abate. The evaluation of this data may impact funds used to achieve HUD program obligations, or to detect fraud, waste and abuse.

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 often than quarterly;**

None – respondents report only after a property inspection which will occur not more frequently than once per year.

*** Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

None

*** Requiring respondents to submit more than an original and two copies of any document;**

None

*** Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**

None

*** In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**

None

*** Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

None

***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**

Because the electronic submission process requires respondents to submit confidential data, HUD has provided each program participant with a unique user identification code, limited the information available via its assessment system to employees with approved security access to the system, and allowed submitters “read-only” capability that will allow them to view their submitted data via the Internet.

*** Requiring respondents to submit proprietary trade secrets, 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.**

None

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.

HUD published a Notice of Proposed Information Collection for Public Comments in the Federal Register, Volume 81; No., 244; Page 92843, on December 20, 2016. The public was given until February 21, 2017, 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.

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

All data that can be linked to a particular PHA is secured from public access. When a PHA submits data electronically to HUD, security prevents users outside of HUD from intercepting this data. HUD’s web access security system ensures that all management data is secure. The authorities or justifications for the security system are: the Information Security HUD Handbook 2400.24, the Computer Security Act of 1987, the Clinger-Cohen Act of 1996, OMB Circular A-130 part 3, and the Government Information Security Reform Act of 2000 (GISRA). The Department's web access security system allows users to apply online for an ID and password and to reset a forgotten password. It also controls and limits access to systems for authorized users by managing the roles and responsibilities for each user of each system.

There are primary and secondary users. Secondary users are granted read-only access to the system. (This is similar to the access that users submitting information have; however, the user only is able to see his/her submission.) HUD authorized primary users (i.e., selected staff) have security access to update the information, with strict controls of the tasks that they may perform.

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 such questions are 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**

The estimated burden hours for the collection of this data are provided in the tables below. The annual burden hours are calculated using the average number of PHAs that will respond each year. Only PHAs that have EHS deficiencies observed during the physical inspections of their properties enter information in this system. And, pursuant to Sections 902.13(a) and (b) of PHAS rule, not all public housing properties are inspected annually.

The burden hour calculations are based on the number of EHS deficiencies identified during the inspection of all of the properties operated by a PHA. All of the calculations assume that the time to complete the template depends on the number of EHS deficiencies because PHAs are required to input data for each observed EHS deficiency.

Total Annual Burden Hour Estimates for PHAs

Number of EHS Deficiencies	Number of Respondents	Frequency of Requirement	X	Est. Avg. Time for Requirement (Hours)	=	Est. Annual Burden (Hours)
1 - 2	454	1		0.12		54.50
3 - 5	256	1		0.17		43.50
6 - 10	123	1		0.33		40.609
11 - 20	80	1		0.83		66.40
21 - 50	38	1		1.0		38.00
51 +	20	1		1.5		30
Subtotals	971					273

Total Estimated Annual Costs to Respondents						
	Number of Respondents	Total Burden Hours	X	Hourly Rate	=	Annualized Cost
PHA Submissions	971	273		\$29.76*		\$8124.48
* Hourly cost for response assuming a GS-12, Step 1 (\$62,101), Analyst or Manager, at the 2016 hourly rate of \$29.76.						

13. Provide an estimate for 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).

There are no additional costs to respondents.

14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The estimated annualized costs to the federal government, based on a GS-12, Step 1 rate are provided below. A GS-12 Step 1 rate is the average salary for a Field Office Analyst/Manager.

Total Estimated Annual Costs to the Federal Government						
	Number of Respondents	Total Burden Hours	X	Hourly Rate	=	Annualized Cost
PHA Submissions	971	140		\$29.76*		\$4066.40
* Hourly cost for response assuming a GS-12, Step 1 (\$62,101, Analyst or Manager at the 2016 hourly rate or \$29.76.						

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

The negligible adjustment (decrease) in the annual burden hours is due to the redistribution of the number of EHS deficiencies per PHA based on a review of the most recent three years of PHA inspection data.

16. For collections 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.

None of the information collected will 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 number and the new expiration date will be displayed on a "Disclosure Statement" that will be the first screen that is viewed on the automated form after OMB approval is received.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to item 19 of the OMB 83-I.

B. Collections of Information Employing Statistical Methods

There are no collections of information employing statistical methods.