



---

## 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:

Date:

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

---

Signature of Senior Officer or Designee:

Date:

X  
Colette Pollard, Departmental Records 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.

Section 7 of the United States Housing Act of 1937 (42 U.S.C. 1427e) requires a public housing agency (PHA) to submit a proposal Designated Housing Plan (Plan), which provides information on the developments and their occupants which the PHA intends to designate for occupancy by elderly families, disabled families, or elderly families and disabled families and a description of the supportive services that will be made available to them; see Section 7(d) (1)(c) of the Act. If the agency wishes to designate a project(s) for elderly families, disabled families, or elderly families and disabled families they must submit a Plan

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 information collected is used by HUD to determine if a PHA's Plan complies with statutory requirements. The information collection is performed at the initiative of the PHA. It is submitted once. Section 7(f)(2) states that PHAs may renew their initial Plans after an initial period of five years by submitting the information that is needed to update their Plans to HUD. (Thereafter, they may renew their Plans every two years.) PHAs may also submit requests to amend their initial Plan as needed.

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.

Plans contain information about the PHA's developments, tenant body, and waiting list that the PHA has gathered already as part of its day-to-day operations. Most of these records are maintained electronically. The other information it needs (excerpts from the local jurisdiction's Consolidated Plan and alternative resources for non-designated families) can be obtained from other local public or private organizations. PIH accepts both mailed and electronic submissions of Plans. A PHA can submit an electronic copy of the Plan to PIH via email. PIH also emails and mails Plan approvals and denials.

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 since it is an original Plan produced by the PHA.

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.

This information collection will not have a significant economic impact on the PHA.

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.

A PHA wishing to designate housing for a specific population is required by Section 7 to submit a Plan to HUD. If A Plan is not submitted, HUD will not be able to determine if the Plan for housing designation complies with statutory requirements or is consistent with the local jurisdiction's Consolidated Plan. The initial Plan is submitted once and, therefore, cannot be submitted less frequently.

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**

Most PHAs keep data on their projects, tenants, and applicants for longer than three years to support effective and efficient management operations. PHAs that don't normally do so, and that wish to renew their Plans, may have to retain the information required by the statute for five years. The other items are not applicable.

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.
  - Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.

HUD published a Notice of Proposed Information Collection for Public Comments in the *Federal Register*, Volume 82; Page 27859, on June 19, 2017. The public have until August 18, 2017, to submit comments on the proposed information collection. HUD Received no comments on this proposed information collection.

9. Explain any decision to provide any payment or gift to respondents, other than reenumeration of contractors or grantees.

No payment or gift will be made to respondents.

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

Information about elderly families or disabled families from the PHA's records, the Consolidated Plan, and from outside sources will be presented as aggregated information in the PHA's Plan, which is a public document.

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.

There are no questions of a sensitive nature.

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.

Variations affecting Specific burden estimated among PHAs:

- \*Size of the PHA.
- \*Size and type (urban, rural, etc.) of the jurisdiction in which the PHA is located.
- \*Organizational structure of the PHA.
- \*Number of current developments the PHA has housing elderly, disabled, and/or elderly families and disabled families.
- \*Number of developments the PHA plans to designate.
- \*The PHA’s management of information pertaining to its developments, facilities and services, tenant body, and waiting list.
- \*Local availability of alternative housing in the PHA’s Jurisdiction for low-income elderly, low-income disabled, and low-income elderly and disabled families.

Estimated average burden:

Projects Designated for:	No. of Rspndnts	Annual Rspns	Hrs per Rspns	Total Hrs	
Elderly Families	25	1	15	375	
Disabled Families	1	1	15	15	
Elderly and Disabled Families	13	1	15	195	
Total	39	1	15	585	
Estimated Annualized Costs:					585 x \$30.00 = \$17,550

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers 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.

There are no additonal costs to PHAs.

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.

Each Plan is reviewed by the Office of Public Housing Programs, Field Office of Public Housing and by the Office of Fair Housing and Equal Opportunity in Headquarters and the Field. A complete review for each Plan submitted requires an estimated 21 hours (analysis consultation with other HUD staff, preparation of approval/disapproval letters, producing a PHA-profile with tenant data from HUD’s PIH Information Center (PIC), packaging the HUD response for signature, preparing a periodic report on the status of the Plans, reviewing the material prepared by the analyst and support staff prior to signing the letter to the PHA, administrative/operational activities, etc.).

Estimated Annualized Costs:

43 x 21 = 903 hours of staff time

903 x \$30.00 = \$27,090

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

Changes are reported in items 13 and 14 of the OMB Form 83-I. This change is based on the expectation that the number of respondents will increase based on current records, the upward trend in senior demographics and the increased use of Low-Income Housing Tax Credits (LIHTC) to finance mixed developments that include senior units by Public Housing Agencies (PHAs).

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.

There will be no publication of information collections.

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.

The OMB Number and Expiration Date will be added in the HUD Notice which will extend the requirements for designation of public housing projects.

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**

This collection of information will not be used for statistical purposes.