

Supporting Statements for Paperwork Reduction Act Submission

HUD Housing Assistance Policy Division

OMB 2502-0587

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 Section 8 Renewal Policy Guide implements Section 524 of the Multifamily Housing Reform and Affordability Act of 1997 (MAHRA) (public law 105-65, enacted on October 27, 1997), which governs how expiring Section 8 project-based assistance contracts are renewed. The Section 8 contract renewal process is an essential component to preserving low income rental housing affordability and availability, while reducing long-term costs of project-based assistance. Project-based assistance contracts are renewed under MAHRA to protect tenants and preserve affordable housing for low and very low-income tenants. The Section 8 contract renewal process will provide housing protection for the low and very low-income tenants living in various United States communities. The Section 8 Renewal Policy Guide sets forth six renewal options from which project Owners may choose when renewing their expiring Section 8 contracts.

- Option One (Mark -Up- To-Market)
- Option Two (Contract Renewals for Other Projects with Current Rents at or Below Comparable Market Rents)
- Option Three (Referral to the Office of Affordable Housing Preservation (OAHP))
- Option Four (Renewal of Projects Exempted from Office of Affordable Housing Preservation (OAHP))
- Option Five (Renewal of Portfolio Reengineering Demonstration or Preservation Projects)
- Option Six (Opt-Outs)

At 120 days prior to contract expiration, the Owner must submit the Contract Renewal Request Form (HUD-9624) and additional information as described below selecting from among the following six options, depending upon what the project is eligible for. The Owner must certify that neither they, nor any of their affiliates, are suspended or debarred and that the information in the contract renewal request is true and complete.

### Option One (Mark -Up- To-Market)

Owners must include a Rent Comparability Study (RCS) (HUD 92273 S8) and a completed Contract Renewal Request Form (HUD 9624) to determine eligibility for Mark-Up-To-Market renewal. Based on the RCS and the Contract Renewal Request Form, Owners must certify on the worksheet section of the HUD-9624 that the Comparable Market Rent Potential is at or above 100 per cent of the published FMR; that the eligibility criteria are waived; or that the Department should use its discretionary authority to mark rents up to market to facilitate a change in ownership to an eligible unaffiliated nonprofit owner. The Owner must also certify that the property does not have low or moderate-income use restrictions that can be eliminated by unilateral action by the Owner. Under Mark-Up-To-Market, Owners must renew the Section 8 contract for a minimum five-year term, subject to annual appropriations.

### Option Two – (Contract Renewals for Other Projects with Current Rents at or Below Comparable Market Rents)

Owners must indicate the term they are requesting e.g., (five years, ten years or twenty years) and that the current contract rent potential of the project is less than or equal to the market rent potential of the comparable market rents. Owners must include a RCS, and a completed Contract Renewal Request Form (HUD 9624), if he/she desires to use such non-Section 8 units in the project as a market ceiling instead of performing a traditional RCS. However, if the Owner requests to renew the Section 8 contract using 75 percent of the FMRs as a market rent ceiling, then no RCS needs to be submitted for an Option Two renewal. The Owner must certify that the project rents do not exceed comparable market rents.

### Option Three – (Referral to the Office of Affordable Housing Preservation (OAHP))

Project owners of eligible FHA-insured or HUD-held mortgages whose current rent levels exceed market rents must submit, within 120 days of the expiration of their Section 8 renewal contract, a HUD Form 9624 requesting renewal under Option 3. Owners, who make an Option 3 election, must select to renew their contracts under Option 3A, Reduction of Section 8 Rents to Comparable Market Rents without Restructuring (Lite), or an Option 3B, Restructure of the mortgage and reduction of Section 8 rents to Comparable Market Rents (Full). Any Option 3A election must also include a rent comparability study. Owners also certify on the Renewal Worksheet for an Option 3A or Option 3B that the project rents exceed comparable market rents; the project currently has a HUD-insured (or HUD-held)

mortgage; neither the owner, or any of their affiliates, are suspended or debarred; and that the information provided is true and correct. Under the Mark-to-Market Program (M2M), owners may be issued an interim M2M HAP Contract (HUD 9640 or HUD 9641) at the current above market rents for up to one year while their renewal request is being processed. A HUD authorized representative must also sign and date the Option 3 Renewal Worksheet to evidence a binding commitment for purposes of Section 579(b) of the Multifamily Assisted Housing Reform and Affordability Act of 1997.

#### Option Four – (Renewal of Projects Exempted from Office of Affordable Housing Preservation (OAHP))

Certain projects, referred to as “exception projects” are exempted from debt restructuring through OAHP pursuant to 514(b) of MAHRA because they are not an “eligible multifamily housing project” as defined in 512(2) of MAHRA. Such projects are: 1) Section 202/8 projects currently financed under Section 202 of the Housing Act of 1959; 2) Section 515/8 projects financed under Section 515 of the Housing Act of 1949; 3) SRO Mod Rehab projects; and 4) projects for which the primary financing or mortgage insurance was provided through the state or local government. Since rents may be renewed above market for these projects, the Owner does not have to submit a RCS with its Contract Renewal Request form (HUD 9624). An Owner of a project that has FHA mortgage insurance or is HUD-held with rents at or below comparable market rents may renew under Option 4 but they must submit a RCS to claim eligibility. If Owners elect to submit a budget-based rent adjustment request in years other than contract renewal, they must also submit a RCS should the property not have a current RCS.

#### Option Five - (Renewal of Portfolio Reengineering Demonstration or Preservation Projects)

Owners requesting a renewal of a Portfolio Reengineering Demonstration or Preservation Project must indicate on the HUD-9624 whether the project has had either a mortgage restructuring, and/or had the rents reduced to market. If the project is a Preservation Project as defined by the Low-Income Housing Preservation and Resident Homeownership Act (LIHPRA) or the Emergency Low Income Housing Preservation Homeownership Act (ELIHPA), the Owner should indicate such on the Contract Renewal Request form HUD-9624.

#### Option Six - (Opt-Outs)

On the Contract Renewal Request form (HUD-9624), the Owner must certify that the required written notification was provided to the tenants living in the project. If the Owner has provided the one-year written notification to the tenants and to the Department, and does not intend to renew the contract, but a full year has not elapsed, the Owner should indicate that he/she agrees to execute a contract renewal for a term that will fulfill the entire one year notification requirement. The Owner must certify that the property does not have any effective Use Agreement, and agree to honor the tenants' right to remain at the property, provided that the Public Housing Agency (PHA) approves a rent equal to the new rent charged for the unit. Owners must include certain information in a notification letter. In order to meet the legal requirements for the notification, examples of the letter are provided in the Section 8 Renewal Policy Guide.

### Automatic OCAF Process

The purpose for the Amend Rents Auto OCAF enhancements to the integrated Real Estate Management System (iREMS) is to provide Owners of project-based Section 8 housing that have a multi-year Section 8 contract with automatically calculated annual OCAF rent increases where applicable. iREMS electronically notifies HUD Asset Management in advance of a property's annual OCAF rent increase due date; which is the Housing Assistance Payments contract anniversary date. The iREMS system calculates the new OCAF rent increases; the calculated rents are sent to the Owners for acceptance. The Auto-OCAF Letter Option One and Three (HUD - 9626), or Auto-OCAF Letter Option Two and Four (HUD - 9627), and Exhibit A of the Multifamily Housing Assistance Payments Basic Renewal Contract will reflect the new Amend Rents for the property. The Auto-OCAF Letter Option One and Three (HUD - 9626), letter will be mailed to the Owner that is not eligible to submit a budget-based rent increase and Auto-OCAF Letter Option Two and Four (HUD - 9627), will be mailed to the Owner that is eligible to submit a budget-based rent increase. The project Owner must also sign and date the form, validate/certify the debt service and non-Section 8 rent potential, and return to the HUD/CA office. The process utilizes the subject forms by streamlining rent adjustment processing by eliminating duplicate processes and significantly reducing paperwork. Costs related to time and materials have been reduced for HUD/CA and the Owner's/Agent's staff members. Owners/Agents benefit from receiving one of the subject letters as opposed to completing an entire OCAF Worksheet (HUD 9625).

**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.**

When the Department provides benefits to owners who repair older Section 8 projects, the Department requires the owner to sign a 20-year HAP contract. However, if an owner fails to comply with the provisions of the contract or other requirements of the Department, then the Department might be forced to abate or terminate the contract, thereby allowing the owner to void his responsibility to provide affordable housing for the 20-year life of the contract. The Use Agreement requires the owner to abide by the requirement to provide affordable housing through the end of the original HAP contract. The Department has research indicating that rents in owner supplied rent comparability studies (RCS) may be inflated. To reduce the chance that rents are inflated, the Department is proposing to require additional justification if rents in the RCS exceed a certain threshold. This information will not be included in a new form but will be part of the RCS prepared by the appraiser. In addition, the Department needs an attachment to the Section 8 contract that provides an agreement which owners will follow as they repair aging Section 8 projects.

The listed documents are used to establish market rents, amend rents and request renewal of a Section 8 contract under Section 524 of the Multifamily Housing Reform and Affordability Act of 1997 (MAHRA):

Project-Based Section 8 Housing Assistance Payments – Addendum to Renewal Contract for Capital Repairs” (HUD-93181) This addendum requires an owner of a Section 8 development agrees to abide by certain conditions during the rehabilitation of the Section 8 project.

Project-Based Section 8 Housing Assistance Payments – Addendum to Renewal Contract for Capital Repairs---Post Rehabilitation Rents at Closing (HUD-93182) This addendum requires an owner of a Section 8 development agrees to abide by certain conditions during the rehabilitation of the Section 8 project and allows the Department to require repayment of certain rental amounts should the final rehabilitation no conform with the original scope of work.

Rider to Original Section 8 Housing Assistance Payments Contract (HUD-93184) This rider places certain requirements on an owner if the Department will agree to the early termination of a Section 8 original term HAP contract. allows the early termination of a pre-MAHRA.

Use Agreement (HUD-90055) This use agreement requires the owner, in exchange for increased rents to pay for repairs, to agree to maintain the project as affordable housing for 20 years.

Contract Renewal Request Form (HUD - 9624) This form is used by the Owner to submit a request for renewal of the project's Section 8 contract. It identifies which option is being requested and contains a worksheet for each option; the one corresponding to the option selected must be completed by the Owner.

OCAF Rent Adjustment Worksheet (HUD - 9625) This form must be completed to calculate the amount of the OCAF rent adjustment for projects eligible for this type of rent increase.

Amend Rents Auto OCAF- Part A (HUD - 9626) This form is completed electronically by the Contract Administrator and sent to the Owner of a project only eligible for an OCAF rent increase under Option One and Option Three. Owners no longer need to submit HUD – 9624 and HUD – 9625.

Amend Rents Auto OCAF- Part B (HUD - 9627) This form is completed electronically by the Contract Administrator and sent to the Owner of a project eligible for a budget-based rent increase or OCAF rent increase under Option Two and Option Four. Owners no longer need to submit HUD – 9624 and HUD – 9625.

Request to Renew Using Non-Section 8 Units in the Section 8 Project as a Market Rent Ceiling, Appendix 9-6 (HUD-9629) This form is used when an owner has made a request to HUD to renew the above Section 8 contract(s) under Option 2 (Chapter Four of this Guide), using the non-Section 8 units in that project as a market rent ceiling instead of performing a traditional rent comparability study.

Request to Renew Using Fair Market Rents (FMRs) as a Market Ceiling, Appendix 9-7a (HUD - 9630) This form is used by the Owner to request that the HAP contract be renewed under Option Two, using 75 percent of Fair Market Rents (FMRs) as a market rent ceiling instead of performing a rent comparability study.

Use Agreement (HUD - 9634) This form is an agreement entered when an Owner chooses to Mark-up-to-Market where a for-profit Owner is transferring the property to a non-profit Owner or is doing a budget-based rent increase for capital repairs for a non-profit Owner.

Projects Preparing a Budget-Based Rent Increase, Attachment 5 (HUD - 9635) This form is to be used by the Owner to calculate the initial Owner equity in the project when preparing a budget-based rent increase.

Basic Renewal Contract – One Year Term (HUD - 9636) This form is the Section 8 contract for a one year term. During the term of the renewal contract, the Contract Administrator shall make housing assistance payments to the Owner in accordance with the provisions of the renewal contract.

Basic Renewal Contract –Multi - Year Term (HUD - 9637) This form is the Section 8 contract for a multi - year term. During the term of the renewal contract, the Contract Administrator shall make housing assistance payments to the Owner in accordance with the provisions of the renewal contract.

Renewal Contract for Mark-Up-To-Market Project (HUD - 9638) This form is the Section 8 contract to be used when the project rents are being marked-up-to-market. During the term of the renewal contract, the Contract Administrator shall make housing assistance payments to the Owner in accordance with the provisions of the renewal contract.

Housing Assistance Payments Preservation Renewal Contract (HUD - 9639) This form is the Section 8 contract for a Preservation project. During the term of the renewal contract, the Contract Administrator shall make housing assistance payments to the Owner in accordance with the provisions of the renewal contract. Such payments provide to the Owner rent benefits comparable to those provided under the Plan of Action in accordance with section 524(e)(1) of the MAHRA.

Interim (Full) Mark-To-Market Renewal Contract (HUD - 9640) This form is the Section 8 contract used for a project that is eligible for Mark-to-Market where debt restructuring is necessary. The renewal contract constitutes a binding commitment for purposes of Section 579(b) of MAHRA. During the term of the renewal contract, the Contract Administrator shall make housing assistance payments to the Owner in accordance with the provisions of the renewal contract.

Interim (Lite) Mark-To-Market Renewal Contract (HUD - 9641) This form is the Section 8 contract used for a project that is eligible for Mark-to –Market where the project will be viable without debt restructuring. The renewal contract constitutes a binding commitment for purposes of Section 579(b) of MAHRA. During the term of the renewal contract, the

Contract Administrator shall make housing assistance payments to the Owner in accordance with the provisions of the renewal contract.

Full Mark-To-Market Renewal Contract (HUD - 9642) This form is the Section 8 contract used for a project where the debt has been restructured. During the term of the renewal contract, the Contract Administrator shall make housing assistance payments to the Owner in accordance with the provisions of the renewal contract.

Watch List Renewal Contract (HUD - 9643) This form is the Section 8 contract used for a project that initially entered an interim contract (HUD -9641 or HUD-9642) but later elects not to restructure the debt. During the term of the renewal contract, the Contract Administrator shall make housing assistance payments to the Owner in accordance with the provisions of the renewal contract.

Project Based Assistance Payments Amendment Contract Moderate Rehabilitation (HUD-9644) This form is an agreement to enter into Housing Assistance Payments Contract and a Housing Assistance Payments Contract with the Owner. Upon satisfactory completion of the rehabilitation in accordance with requirements specified in the Agreement, the PHA will enter into a Housing Assistance Payments Contract with the Owner.

Consent to Assignment of HAP Contract for Freddie Mac Financing (HUD 9648A) This form is used when an owner has advised the contract administrator (HUD or a public housing agency (PHA) acting as contract administrator under annual contributions contract (ACC) with HUD) that the owner wants to assign the owner's interest in the HAP Contract to the lender, as security for a loan by the lender to the owner, and that the lender will assign the loan to Freddie Mac.

Consent to Assignment of HAP Contract as Security to FNMA as Security for FNMA Credit Enhancement (HUD-9648D) This form is used when an owner has advised the contract administrator that the owner wants to grant the FNMA a security interest in the HAP Contract, as security for the obligations of the owner to FNMA on account of FNMA's credit enhancement of a loan to the owner.

Consent to Assignment of HAP Contract as Security for Financing (HUD-9649) This form is used when an owner has advised the contract administrator that the owner wants to grant the lender a security interest in the HAP Contract, as security for a loan by the lender to the owner with respect to the project.

Consent to Assignment of HAP Contract as Security for FNMA Financing (HUD-9651) This form is used when an owner has advised HUD that the owner wants to assign the owner's interest in the HAP Contract to the lender, as security for a loan by the lender to the owner, and that the lender will assign the loan to FNMA



**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 information is submitted individually by project Owners on an annual and case-by-case basis. HUD has considered the use of improved electronic technology in collecting information; however, there are no funds to upgrade the electronic submission system. Presently the HUD Office's staff enters and updates the Owner's contract information into the HUD integrated Real Estate Management System (iREMS).

**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.**

Duplication would occur depending on the contract expiration date. Other parts of the collection may have to be completed more than once when the contract is a multi-year contract.

**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 collection involves small businesses, which are small for profit and non-profit organizations.

**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.**

This collection needs to be conducted for the owner to be able to continue to be eligible and provide for terminating (non-MAHRA) contracts early and have renewal options available, otherwise the owners would not be adhering to MAHRA policy guidelines.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner: (PLEASE ANSWER EACH BULLET SEPARATELY)**

**\* requiring respondents to report information to the agency more often than quarterly;**

There is no requirement for respondents to report the information more than quarterly.

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

There is no requirement for respondents to prepare a written response to this collection in fewer than 30 days.

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

There is no requirement for respondents to submit more than an original and two copies of this document.

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

There is no requirement for respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

**\* 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;**

This collection is not made in connection with a statistical survey.

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

There is no use of a statistical data classifications with this collection.

**\* 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;**

There is no pledge of confidentiality that is not supported by authority established in statute or regulation.

**\* 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.**

There is no requirement for respondents to submit proprietary trade secrets, or other confidential information.

**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.**

In accordance with 5 CFR 1320.8(d), the Agency's notice soliciting public comments, was announced in the Federal Register on May 11, 2017 (Volume 82, No. 90, Page 22015).  
( No comments were received)

Federal Register/Consultation outside the Agency

The following Code of Federal Regulations:

Section 524 of MAHRA

The Agency's notice soliciting both regulations to public for comments.

**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 provided to the respondents.

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

Please refer to the HUD\_PTA\_Template\_2017\_S8 Policy

**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.**

No questions of a sensitive nature are included in this collection. This PRA is for the forms needed for assisted housing owners to submit renewal requests for their expiring Section 8 contracts. All the data and information provided on the forms pertain to the project, it's financial status, and the status of the expiring Section 8 contract. No resident information is collected on any of these forms.

**12. Provide estimates of the hourly burden of the collection of information.**

Information Collection		Number of Respondents	Total Annual Responses	Burden Hours per Response	Total Annual Burden Hrs.	Hourly Cost	Total Annual Cost
1. Contract Renewal Request Form (HUD-9624)	E	11428	11428	1	11428	\$38.20	\$436,549.60
2. OCAF Rent Adjustment Worksheet (HUD-9625)	E	7957	7957	1	7957	\$38.20	\$303,957.40
3. Amend Rents Auto OCAF Part A (HUD- 9626)		419	419	0.5	209.5	\$38.20	\$8,002.90
					0	\$38.20	\$0.00
					0	\$38.20	\$0.00
4. Amend Rents Auto OCAF Part B (HUD- 9627)	E	1801	1801	0.5	900.5	\$38.20	\$34,399.10
5. Request to Renew Using Non-Section 8 Units in the Section 8 Project as a Market Rent Ceiling (HUD-9629)	E	10	10	0.5	5	\$38.20	\$191.00
6. Request to Renew Using FMR's as Market Ceiling (HUD-9630)	E	88	88	0.5	44	\$38.20	\$1,680.80

7. Owners Notification that it will Not Renew contract (HUD-9631)		1000	1000	0.5	500	\$38.20	\$19,100.00
8. Owner Notification that it will Renew contract (HUD-9632)		800	800	0.5	400	\$38.20	\$15,280.00
9. Use Agreement Capital Repairs (HUD-9634)		55	55	1	55	\$38.20	\$2,101.00
10. Project Preparing a budget based Rent increase (HUD-9635)	E	1697	1697	1.5	2545.5	\$38.20	\$97,238.10
11. Basic Renew Contract - one year term (HUD-9636)		892	892	0.75	669	\$38.20	\$25,555.80
12. Basic Renew Contract -Multi - Year Term (HUD -9637)		69	69	0.75	51.75	\$38.20	\$1,976.85
13. Renewal Contract for Mark-Up-To-Market Project (HUD - 9638)		169	169	0.75	126.75	\$38.20	\$4,841.85
14. Housing Assistance Payments Preservation Renewal Contract (HUD-9639)		213	213	0.75	159.75	\$38.20	\$6,102.45
15. Interim (Full) Mark-To-Market Renewal Contract (HUD - 9640)		53	53	0.75	39.75	\$38.20	\$1,518.45
16. Interim (Lite) Mark-To-Market Renewal Contract (HUD - 9641)		68	68	0.75	51	\$38.20	\$1,948.20
17. Full Mark-To-Market Renewal Contract (HUD - 9642)		63	63	0.75	47.25	\$38.20	\$1,804.95
18. Watch List Renewal Contract (HUD - 9643)		117	117	0.75	87.75	\$38.20	\$3,352.05

19. <u>Project Based Assistance Payments Amendment Contract Moderate Rehabilitation (HUD-9644)</u>	25	25	1	25	\$38.20	\$955.00
20. HFA Original Term Contract Extension (HUD-9647)	10	10	1	10	\$38.20	\$382.00
21. Consent to Assignment of HAP Contract for Freddie Mac Financing (HUD 9648A)	50	50	1	50	\$38.20	\$1,910.00
22. Consent to Assignment of HAP Contract as Security to FNMA as Security for FNMA Credit Enhancement (HUD-9648D)	50	50	1	50	\$38.20	\$1,910.00
23. Consent to Assignment of HAP Contract as Security for Financing (HUD-9649)	50	50	1	50	\$38.20	\$1,910.00
24. Consent to Assignment of HAP Contract as Security for FNMA Financing (HUD-9651)	50	50	1	50	\$38.20	\$1,910.00
25. Project-Based Section 8 Housing Assistance Payments - Addendum to Renewal Contract for Capital Repairs" (HUD-93181)	25	25	0.5	12.5	\$38.20	\$477.50
26. Project-Based Section 8 Housing Assistance Payments - Addendum to Renewal Contract for Capital Repairs---Post Rehabilitation Rents at Closing (HUD-93182)	50	50	0.5	25	\$38.20	\$955.00
27. Rider to Original Section 8 Housing Assistance Payments Contract (HUD-93184)	20	20	0.5	10	\$38.20	\$382.00
28. Housing Assistance Payments Contract (HUD 52522a and b)	20	20	0.5	10	\$38.20	\$382.00

29. Amendment to Section 8 HAP Contract pursuant to 8(bb) HUD-93185	60	60	0.5	30	\$38.20	\$1,146.00
30. Use Agreement (HUD-90055)	75	75	0.5	37.5	\$38.20	\$1,432.50
Totals	27,384	27,384		25,638		\$979,352.50

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.** There are no additional costs to respondents.

**14. Provide estimates of annualized cost to the Federal Government.**

The majority of the work involves reviewing of the Owner's contract submission and/ rent adjustment and updating the HUD systems with the contract data information. The HUD staff will process the funding and release funds after approval funding in LOCCS is reviewed. PBCA staff vouchers for the funds through a HUD approved process. The Treasury Department issues funds/checks through the direct deposit process. The cost is reflective of the federal fiscal year 2017 hourly rates for a federal employee equivalent to a GS-12 and HUD Appraiser equivalent to a GS-13 grade level.

Information Collection	Number of Responses	Hours per Response	Total Annual Hours	Hourly Cost	Total Annual Cost
HUD-9624 and Other Documents	25,226	1	25,226	\$38.20	\$963,633.20
RCS Associated Documents	98	2	196	\$45.42	\$8,902.32
Total Documents	25324		25422		\$972,535.52

Operation Cost to Federal Government:

Other Cost: Postage	<u>\$3.00 x 25,439</u>
Total Postage	\$76,317
Total Annual Cost	\$972,536
<u>Total Postage and Annual Cost to the Federal Government: \$1,048,853</u>	

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

Due to the explanation below, the number of estimated respondents increased from 25,514 to 27,384, with a difference of 1,870 additional respondents. Since respondents increased, the total burden hours also increased, from 24,718 to 25638 hours. This is a net increase of 920 hours.

This package is a revision of a currently approved collection resulting in program changes. The Mark-To-Market statute requires owners who have undergone loan restructuring to accept renewal of the section 8 contract on terms and conditions listed in the Restructuring Commitment. When the contracts were revised in 2007 a specific sentence holding the owner to that statutory requirement was inadvertently left out of the contract. It has now been added in Section 2.d. of the contract. This sentence does not create any additional reporting burden on the owner, nor does it impact the number of MTM contracts that would be signed.

The other forms have in the past been sample forms for use by the field offices but the Department now feels that these forms should be converted to formal documents. In the case of forms HUD-93181 and 93182, the Department has undertaken this safeguard to help ensure that owners who have secured rent increases to pay for repairs to a project do in fact complete the repairs that are acceptable to the Department. In the case of HUD-93184 the Department wanted to formally place certain requirements on an owner if the Department will agree to the early termination of a Section 8 original term HAP contract. This is part of the Department's efforts to preserve affordable housing. Last, in the case of HUD-90055 (a use agreement), the Department wants to require an owner to continue providing housing for low income households even if the Department finds that the property, through owner neglect, no longer qualifies for rental assistance. The Department uses other use agreements in similar transactions to ensure long-term housing.



**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.**

Results 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 requesting approval to avoid displaying the expiration date.

**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 the certification statement identified in Item #19 on form OMB 83-I, "Certification for Paperwork Reduction Act Submissions."

**B. Collections of Information Employing Statistical Methods**

This information collection does not employ statistical methods.