

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.

1. Agency/Sub-agency Originating Request: U.S. Department of Housing and Urban Development (HUD) Office of Public and Indian Housing (PIH) Financial Management Division (FMD)	2. OMB Control Number: a. b. None
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3. Type of information collection: (check one) a. <input checked="" type="checkbox"/> New Collection b. <input type="checkbox"/> Revision of a currently approved collection c. <input type="checkbox"/> Extension of a currently approved collection d. <input type="checkbox"/> Reinstatement, without change , of previously approved collection for which approval has expired e. <input type="checkbox"/> Reinstatement, with change , of previously approved collection for which approval has expired f. <input type="checkbox"/> 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. <input checked="" type="checkbox"/> Regular b. <input type="checkbox"/> Emergency - Approval requested by c. <input type="checkbox"/> Delegated 5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities? — Yes <input checked="" type="checkbox"/> No 6. Requested expiration date: a. <input checked="" type="checkbox"/> Three years from approval date b. Other (specify):
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7. Title:
 Assessing Compliance with Consolidated Annual Contributions Contract (ACC) and Regulatory Insurance Requirements

8. Agency form number(s):
 None

9. Keywords: Compliance, ACC, Regulatory, Insurance, Requirements,

10. Abstract:

 A one-time survey to collect information needed to assess Public Housing Authorities (PHAs) compliance with insurance requirements under the ACC and HUD Regulations at 24 CFR 965 Subpart B

11. Affected public: (mark primary with "P" and all others that apply with "X") a. Individuals or households e. Farms b. Business or other for-profit f. Federal Government c. Not-for-profit institutions g. <input checked="" type="checkbox"/> State, Local or Tribal Government	12. Obligation to respond: (mark primary with "P" and all others that apply with "X") a. Voluntary b. <input checked="" type="checkbox"/> Required to obtain or retain benefits c. Mandatory
13. Annual reporting and recordkeeping hour burden: a. Number of respondents: 300 b. Total annual responses: 300 Percentage of these responses collected electronically: 100% c. Total annual hours requested: 100 d. Current OMB inventory: 0 e. Difference (+, -): 0 f. Explanation of difference: 0 1. Program change: 2. Adjustment:	14. Annual reporting and recordkeeping cost burden: (in thousands of dollars) a. Total annualized capital/startup costs 0 b. Total annual costs (O&M) 0 c. Total annualized cost requested 0 d. Total annual cost requested 0 e. Current OMB inventory: None f. Explanation of difference: N/A 1. Program change: N/A 2. Adjustment: N/A
15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X") a. Application for benefits e. <input checked="" type="checkbox"/> Program planning or management b. <input checked="" type="checkbox"/> Program evaluation f. Research c. General purpose statistics g. <input checked="" type="checkbox"/> Regulatory or compliance d. Audit	16. Frequency of recordkeeping or reporting: (check all that apply) a. <input type="checkbox"/> Recordkeeping b. Third party disclosure b. <input checked="" type="checkbox"/> Reporting: 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 type="checkbox"/> Annually 7. <input type="checkbox"/> Biannually 8. <input checked="" type="checkbox"/> Other (describe) One time

17. Statistical methods: Does this information collection employ statistical methods? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	18. Agency contact: (person who can best answer questions regarding the content of this submission) Name: Neba Funiba Phone: 202-402-4553
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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.

The information to be collected will be used to assess compliance with property/casualty insurance requirements stipulated in: [1] Section 9(e)(1)(H) of the Housing Act of 1937, [2] United States Department of Housing and Urban Development's (HUD's) regulation at 24 CFR 965 Subpart B—Required Insurance Coverage, and [3] the Consolidated Annual Contributions Contract (ACC) Part A and Part B. The ACC between PHAs and HUD requires that PHAs maintain specified insurance coverage for property and casualty losses that would jeopardize the financial stability of the PHAs. These requirements are also intended to ensure appropriate insurance coverage needed to protect Federal interest in PHA properties and operations.

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.

A survey of 300 PHAs selected through stratified random sampling will be conducted. The information collected through the survey will be used to assess PHAs compliance with ACC and regulatory insurance requirements. PHAs are required to have the insurance coverage against property/casualty losses and to protect Federal interest in PHA properties and operations.

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 survey shall be administered electronically (via email) to PHAs, who will in turn send the responses electronically (via email).

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.

This is a new project; the information being collected from PHAs has not been collected before.

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 to be collected will have no impact on small businesses or other small entities including small PHAs. This is a one-time survey designed to be completed in less than 25 minutes (about 20 minutes on the average). The information to be used in responding to the questions is information that PHAs are statutorily required to have in their files and (pursuant to the ACC) readily provide to HUD as part of HUD's Congressionally-mandated oversight. The questions are short, simple, and some of them require only dichotomous responses—that is, 'yes or no' answers. Furthermore, the questionnaire will be administered online (through survey monkey), which eliminates time and costs associated with postage of paper-based mail questionnaires. Small PHAs will not need as much time to complete the survey, as some of them have only one project (in one location and with fewer units). Therefore, small PHAs will not encounter the burden involved in aggregating information from multiple big projects, in multiple locations.

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.

Congress mandates that Federal Agencies oversee programs that are assisted with Federal funds. The collection and analysis of the information will enable HUD to maintain appropriate oversight of a program assisted with Federal funds. Second, the collection and analysis of this information enables HUD to determine whether PHAs have the types of insurance coverage needed to protect Federal interests in PHA properties and operations. And third, the information may enable HUD to amend existing policies regarding insurance coverage for PHAs.

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-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 study;

Not Applicable

- requiring the use of a 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 that is inconsistent with guidelines stipulated 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 Comment in the *Federal Register*, Volume 81; No. 148; Page 50721, August 2, 2016. The public was given until October 3 2016 to comment. 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 payment 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.

Respondents are not asked to submit any personal information.

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.

All questions in the questionnaire are generic and relate only to PHAs. Answers to the questions do not require private or personal information.

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 questionnaire will be administered online through survey monkey to 300 PHAs selected through stratified random sampling. The time required to complete the survey will vary by PHA size. Small PHAs will not need as much time to complete the survey, as some of them have only one project (in one location). The use of online survey eliminates time and costs associated with

paper-based, mail questionnaires. The hourly cost for completing the questionnaire is estimated based on a Clerk's annual salary of \$44,941 at a GS7/1 level rate (Salary Table 2017-GS) or an hourly rate of \$21.53. HUD estimates that the annual burden hours for the operating budget required for the 300 PHAs for the form HUD-52574 required for all PHAs averages 20 minutes (or 0.33 hour) each. (This assumes that there would be a 100% survey response rate.)

PHA Burden Hours and Cost							
Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Estimated Hours to Complete Questionnaire	Total Annual Burden Hours	Hourly Cost Per Response	Annual Cost
	300	1	300	0.33 ⁺	300 x 0.33 ⁺ = 100	\$21.53	\$21.53 x 100 = \$2,153.00

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.

There are no additional costs to the respondents (i.e., the PHAs). The total annual cost burden to respondents remains the same as in Item 12.

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.

The estimated annualized costs to the federal government for the collection for HUD Form 52574 is based on an Office Assistant's annual salary of \$44,941 at a GS7/1 level rate (Salary Table 2017-GS) or an hourly rate of \$21.53.

Estimated Annual Cost to the Federal Government – Office Assistant							
Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Estimated Hours to Complete Questionnaire	Total Annual Burden Hours	Hourly Cost Per Response	Annual Cost
	300	1	300	2	300 x 2 = 600	\$21.53	\$21.53 x 600 = \$12,918.00

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

The estimated annual cost to the Federal Government is different from the estimated annual to cost to a PHA since one government staff member (i.e., the Office Assistant) is responsible for the collection for HUD Form 52574

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.

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.

