

Supporting Statement for Paperwork Reduction Act Submissions

Survey to Assess Operational and Capacity Status of Housing Counseling Agencies after a Disaster

OMB Control Number 2502-0615

No Form (Disaster Survey)

A. Justification

1. The Office of Housing Counseling is responsible for administration of the Department's Housing Counseling Program, authorized by Section 106 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701w and 1701x). The Housing Counseling Program supports the delivery of a wide variety of housing counseling services to homebuyers, homeowners, low-to moderate-income renters and the homeless. The primary objectives of the program are to expand homeownership opportunities, preserve homeownership and improve access to affordable housing. The housing counselors provide guidance and advice to help families and individuals improve their housing conditions. After a disaster, these services expand to include assessing housing, financial, and other issues caused by the disaster, discussing the best resources for assistance, working with local resources that may provide with additional assistance, helping communicate with lenders, insurance companies and government agencies, and helping with necessary paperwork.

To participate in HUD's Housing Counseling program, a housing counseling agency must be approved by HUD, or designated as a subgrantee or affiliate of a HUD-approved intermediary, multi-state organization, or a state housing finance agency. A participating agency shall deliver housing counseling services consistent with the agency's housing counseling work plan.

24 CFR § 214.305 requires, among other things, that agencies notify HUD when any aspect of the agency's purpose or functions may impair its ability to comply with these regulations or the applicable grant agreement within 15 days. The notification can be by email or letter. During a performance review, pursuant to 24 CFR § 214.307, the HUD staff verifies that these notifications have occurred. The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Public Law 93-288) as amended also has disaster reporting requirements.

A wide spread disaster makes it critical that the Office of Housing Counseling receive information on the impact of the disaster on HUD-participating housing counseling agencies quickly and with consistent input. "Survey to Assess the Operational and Capacity Status of Housing Counseling Agencies after a Disaster" more accurately assesses the operating status and capacity of agencies of housing counseling agencies impacted by Presidentially Declared Disasters and/or Federal Emergency Management Agency (FEMA) Emergency Declaration to provide their approved counseling services

2. The "Survey to Assess Operational and Capacity Status of Housing Counseling Agencies after a Disaster" (Disaster Survey) is an assessment instrument developed by HUD's Office of Housing Counseling. The purpose of the Disaster Survey is to collect post-disaster information from HUD Participating Housing Counseling agencies located in areas impacted by a designated disaster area. The information is needed for the Office of Housing Counseling to determine the ability of Housing Counseling agencies to perform their required functions during a disaster recovery period. Housing Counseling agencies will be asked about their

operational status and their capacity to provide approved services. Information collected will also include data status pertaining to the Housing Counseling agency's ability to communicate, operate remotely, provide accommodation for disabled persons, services to clients and able to support other impacted areas. Additionally, the information collected will be used to identify and provide recovery support and assistance to the agencies and their clients. It will also provide information that allows the Office of Housing Counseling to develop alternate ways to provide services to people impacted by a disaster.

3. The "Survey to Assess the Operational and Capacity Status of Housing Counseling Agencies after a Disaster" would be conducted by a survey instrument such as SurveyMonkey and an EXCEL spreadsheet, with contacts made by email and phone. More advanced communication technology would likely be ineffective due to the possible destruction of the communication infrastructure in the disaster area. The survey would be launched immediately after the Declaration. This collection requests information necessary to determine the extent of physical damage and curtailment of services to housing counseling agencies and curtailment of services provided to clients, if any, caused by a declared disaster. The information collected will be used to identify and provide recovery support and assistance to the agencies and their clients. It also provides information that allows the Office of Housing Counseling to develop alternate ways to provide the services to people impacted by a disaster.

4. There is no duplication of other sources for this information. Each declared disaster is unique and requires unique outreach and responses.

5. HUD makes every effort to minimize the burden of information collection to all organizations participating in the Housing Counseling Program. Only information critical to evaluating an organization's compliance with program requirements is collected.

6. If there was not an assessment of the Operational and Capacity Status of Housing Counseling Agencies after a Disaster, HUD would not be able to provide the necessary support and assistance to housing counseling agencies and their clients to assist in the recovery efforts after a disaster.

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;
Respondents could be required to report information more than quarterly in the unlikely event of disasters occurring in short intervals.
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
Non-Applicable
- requiring respondents to submit more than an original and two copies of any document;
Non-Applicable
- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
Non-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;
Non-Applicable

- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
Non-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
Non-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.
Non-Applicable

- In accordance with 5CFR 1320.8(d), this information collection soliciting public comments was announced in the Federal Register on **May 22, 2018**, Volume **83**, No. **99**, Pages **23719**. No comment received.
- There are no payments or gifts to respondents with respect to this collection.
- A Privacy Threshold Analysis has been approved for this collection. HUD is committed to protecting the privacy of individuals' information stored electronically or in paper form, in accordance with federal privacy laws, guidance, and best practices.
- There are no questions of a sensitive nature included with this collection.
- The estimated number of respondents, frequency of response, annual hour burden and estimated cost to the respondents are stated below.

| Information Collection | Number of Respondents | Frequency of Response | Responses Per Year | Average Burden Hours Per Response | Annual Burden Hours | Hourly Cost per Response | Total Annual Cost |
|------------------------|-----------------------|-----------------------|--------------------|-----------------------------------|---------------------|--------------------------|-------------------|
| Disaster Survey | 100.00 | 2.00 | 200.00 | 0.50 | 100.00 | \$32.81 | \$3,281.00 |
| TOTALS | 100.00 | | 200.00 | | 100.00 | | \$3,281.00 |

According to the U.S. Department of Labor, Bureau of Labor Statistics website (https://www.bls.gov/oes/current/oes_nat.htm) the wage rate category for counselors 21-1010 is estimated to be \$32.81 per hour including the wage rate multiplier, therefore, the estimated burden hour cost to respondents (counselors) is estimated to be (\$3,281) annually.

- There is no additional cost to respondents or record keepers.

| Information Collection | Number of Respondents | Frequency of Response | Responses Per Year | Burden Hours Per Response | Annual Burden Hours | Hourly Cost per Response | Total Annual Cost |
|------------------------|-----------------------|-----------------------|--------------------|---------------------------|---------------------|--------------------------|-------------------|
| Disaster Survey | 100.00 | 2.00 | 200.00 | 1.00 | 200.00 | \$41.81 | \$8,362.00 |

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| TOTALS | 100.00 | | 200.00 | | 200.00 | | \$8,362.00 |
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This cost is based on the hourly rate of a GS13-1.

- 15. This is a reinstatement without change.
- 16. There is no anticipated publication of the information gathered through this collection.
- 17. HUD is not requesting approval to avoid displaying the expiration date
- 18. There are no exceptions to the certification statement identified in item #19 Certification of the Paperwork Reduction Act” of the OMB 83-I.

B. Collections of Information Employing Statistical Methods

The collection of information does not employ statistical methods.