

19. Certification for Paperwork Reduction Act Submissions

On behalf of this Federal Agency, 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: X Donald J. La Voy, Deputy Assistant Secretary Real Estate Assessment Center	Date:
Signature of Senior Officer or Designee: X Colette Pollard, Departmental Reports Management Officer Office of Chief Information Officer	Date:

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.**

Housing that is insured and/or assisted under certain HUD programs is required to be inspected using the Uniform Physical Condition Standards (UPCS) pursuant to 24 CFR Part 5, Subpart G. (See attached **Exhibit A**.) These standards are intended to ensure that such housing is decent, safe, sanitary and in good repair. HUD's Section 8 housing, public housing, HUD-insured multifamily housing, and other assisted housing are subject to uniform physical standards. To the extent feasible, the physical inspection procedures by which the standards will be assessed are uniform in the covered programs.

The UPCS inspection process achieves consistency in physical condition standards for HUD housing and standardizes the inspections to determine compliance with UPCS, all through an electronically-based inspection system that evaluates, rates, and ranks the physical condition of HUD housing objectively.

Under the Physical Condition of Multifamily Properties regulation at 24 CFR Part 200 Subpart P (See attached **Exhibit B**), depending on the results of its physical condition inspection, a multifamily property will be assigned one of three designations with the accompanying inspection time lines: (1) standard 1 performing is a property that scores 90 points or higher and will undergo a physical inspection once every three years; (2) standard 2 performing is a property that receives a score of 80 points or higher but less than 90 points and will undergo a physical inspection once every two years; and (3) standard 3 performing is a property that receives a score of less than 80 points and will undergo an annual physical inspection.

Pursuant to Section 6(j) of the United States Housing Act of 1937, all PHA properties are required to be assessed by HUD under the Public Housing Assessment System (PHAS) regulation Physical Condition Indicator, 24 CFR part 902, Subpart B. (See attached **Exhibit C**.) For PHAs with 249 or fewer units, properties will be inspected every two or three years based on the PHAs overall PHAS score. For PHAs with 249 or fewer units that are designated troubled, properties will be inspected annually. For all PHAs with 250 or more units, each property will be assessed based on that property's score. A property with a score of 90 or higher will be assessed every three years; a property with a score of 80 but less than 90 will be assessed every two years; and a property with a score of less than 80 will be assessed annually. Finally, PHAs with 250 or more units that are designated troubled will have all of their properties inspected annually.

To conduct physical condition inspections of approximately 14,000 multifamily and PHA projects annually, HUD uses contract inspectors who are trained and certified by HUD in the UPCS inspection protocol. Prior to being accepted in the UPCS training, prospective inspector candidates must complete and submit the Inspector Candidate Assessment Questionnaire to HUD.

In addition, as part of the Physical Inspection Alignment Initiative among USDA, Treasury/IRS, HUD and state Housing Finance Agencies (HFAs), state HFA staff fill out the Inspector Candidate Assessment Questionnaire for informational purposes only.

- 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 respondents to this collection are individuals who seek to become HUD certified UPCS inspectors. The questionnaire provides PIH-REAC with basic knowledge of an inspection candidate's inspection skills and abilities to make a determination whether a candidate has the required basic skills and abilities to take the required training. For example, the ability to use the Internet is necessary to download property inspection data and then upload inspection the report to PIH-REAC.

As mentioned in the response to question #1 above state HFA staff fill out the Inspector Candidate Assessment Questionnaire for information purposes only. Because under the Physical Inspection Alignment Initiative among USDA, Treasury/IRS, HUD and state HFAs, HFA staff conduct inspections in accordance with the UPCS protocol, HFA staff take the UPCS training.

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.**

This questionnaire is automated and submitted via the Internet. The electronic submission of this data results in significant benefits, such as cost savings from reduced need for paper submission; and faster HUD review and analysis. In addition, electronic submission reduces the administrative burden that manual submission presents to HUD program participants and HUD staff alike. See attached **Exhibits D and E**.

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 may be used or modified for the purpose described in the response to question 2, above.

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 of information does not impact small businesses or other small entities. HUD believes that these costs are minimal since the submission of the questionnaire is via the Internet

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.**

The requirement for the physical inspection of Multifamily and Public Housing properties is statutory and regulatory. Due to the volume of physical inspections conducted annually by HUD, it is most cost effective to use contract inspectors. Without the physical inspections, 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 or insolvency of a Multifamily or Public Housing property. Furthermore, evaluation of submitted 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 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

There are no special circumstances applicable to this questionnaire.

8. If applicable, provide a copy and identify the date and page number of publications 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 or Public Comments in the Federal Register, Volume 83, No. 75; Page 17186 on April 18, 2018. The public was given until June 18, 2018, to submit comments on the proposed collection. HUD received no public 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.

Not applicable. Information collected does not apply to individuals or any information covered by the Personal Identifiable information covered under the Privacy Act of 1974 (5 U.S.C. 552a).

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 information of a sensitive nature is being requested.

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 estimated annual number of Inspector Candidate submissions is the average number of assessment questionnaires received over the past 3 years. The chart below outlines the burden associated with completing the collection, copying documents and submitting everything, broken down by form. The estimated annual cost to respondents assumes an annual salary of \$53,062 at a GS-11/1 level rate (Salary Table 2018-GS), or an hourly rate of \$25.43.

Information Collection	Number of Respondents	Frequency of Response	Responses per annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
HUD 50002A	200.00	1.00	200.00	0.33	66.00	\$25.43	\$ 1,678.38
HUD 50002B-FHA	35.00	1.00	35.00	0.25	8.75	\$25.43	\$ 222.517
Total Burden			235.00		74.75		\$ 1900.89

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.

No other costs are associated with the collection of this information.

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 cost to the federal government, based on a GS-13, step 1, rate is provided in the table, below. A GS-13, step 1, rate is the average salary for an Inspector Administration Analyst. This annualized cost represents the time for the federal government staff to review each questionnaire, notify unqualified candidates, and process qualified candidates for the first phase of the training.

Total Estimated Annual Costs to the Federal Government						
	Number of Respondents	Total Burden Hours	X	Hourly Rate	=	Annualized Cost
Inspector Assessment Questionnaire	235.00	235.00		\$36.24*		\$ 8,516.00
* Hourly cost for response assuming an Analyst annual salary, GS-13, step 1, annual rate of \$75,628; hourly rate is \$36.24 (Salary Table 2018-GS).						

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

This is a re-instatement of a previously approved collection. Revisions have been made to the 83i and throughout the Supporting Statement to update the burden hours and costs to individuals associated with submitting the form. The revisions include correcting the burden hours in Box 13 to reflect the annual burden rather than the burden over three years for this collection.

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.

The information collected 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. The OMB approval number and expiration date will be displayed on the questionnaire.

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 form OMB 83-i.

B. Collections of Information Employing Statistical Methods

Not applicable.