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
Office of Public and Indian Housing Real Estate Assessment Center

2. OMB Control Number:
a. 2577-0026 b. None

3. Type of information collection: (check one)
- a. ☐ New Collection
- b. ☐ Revision of a currently approved collection
- c. x Extension of a currently approved collection
- d. ☐ Reinstatement, **without change**, of previously approved collection for which approval has expired
- e. ☐ Reinstatement, **with change**, of previously approved collection for which approval has expired
- f. ☐ 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. X Regular
- b. ☐ Emergency - Approval requested by
- c. ☐ Delegated

5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities?
☐ Yes X No

6. Requested expiration date:
a. X Three years from approval date b. ☐ Other (specify)

7. Title:
Public Housing Operating Fund Program: Operating Budget and Related Form

8. Agency form number(s): (if applicable)
HUD--52574

9. Keywords:
Housing, public housing operating subsidy, budget

10. Abstract:
This information collection will ensure that Public Housing Agencies (PHAs) follow sound financial practices and that federal funds are used for eligible expenditures in their operating budget which must be approved by the PHA's Board of Commissioners. PHAs use the information as a financial summary and analysis of immediate and long-term operating programs and plans to provide control over operations and achieve objectives.

11. Affected public: (mark primary with "P" and all others that apply with "X")
- a. Individuals or households
- b. Business or other for-profit
- c. P Not-for-profit institutions
- e. Farms
- f. Federal Government
- g. X State, Local or Tribal Government

12. Obligation to respond: (mark primary with "P" and all others that apply with "X")
- a. Voluntary
- b. P Required to obtain or retain benefits
- c. X Mandatory

13. Annual reporting and recordkeeping hour burden:

a. Number of respondents	3,041
b. Total annual responses	3,041
Percentage of these responses collected electronically	50%
c. Total annual hours requested	517
d. Current OMB inventory	517
e. Difference (+,-)	
f. Explanation of difference:	
1. Program change:	
2. Adjustment:	-

14. Annual reporting and recordkeeping cost burden: (in thousands of dollars)
Do not include costs based on the hours in item 13.
- a. Total annualized capital/startup costs
- b. Total annual costs (O&M)
- c. Total annualized cost requested
- d. Current OMB inventory
- e. Difference
- f. Explanation of difference:
  1. Program change:
  2. Adjustment:

15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X")
- a. P Application for benefits
- b. Program evaluation
- c. General purpose statistics
- d. Audit
- e. X Program planning or management
- f. Research
- g. X Requlatory or compliance

16. Frequency of recordkeeping or reporting: (check all that apply)
- a. X Recordkeeping b. ☐ Third party disclosure
- c. X Reporting:
  1. ☐ On occasion 2. ☐ Weekly 3. ☐ Monthly
  4. ☐ Quarterly 5. ☐ Semi-annually 6. X Annually
  7. ☐ Biennually 8. ☐ Other (describe)

17. Statistical methods:
Does this information collection employ statistical methods?
☐ Yes X No

18. Agency contact: (person who can best answer questions regarding the content of this submission)
Name: Kevin Gallagher
Phone: (202) 402-4192

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: Kevin Gallagher, Director Financial Management Division (FMD), Office of Public Housing Programs	Date:

Signature of Senior Officer or Designee: X Colette Pollard, Departmental Reports Management Officer, Office of the 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.

Procedures to assure sound management practices by public housing agencies (PHAs) are required by Section 6(c)(4) of the United States Housing Act of 1937 and Section 11 of the Consolidated Annual Contributions Contract (ACC). The ACC is between a PHA and the United States of America, acting by and through the Secretary of HUD, and requires PHAs to prepare and have approved by their Board of Commissioners an annual operating budget in a manner and using such forms as prescribed by HUD. Only "troubled" PHAs are required to submit operating budgets and salary schedules to HUD. 24 CFR Part 990 is the applicable HUD regulation. PHAs are no longer required to use HUD budget forms in a prescribed format, with the exception of the Board Resolution which is used to approve the PHA's operating budget and is a required submission by all PHAs to HUD.

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.

Approximately 3,041 PHAs are required to submit their operating budgets and salaries schedules to HUD. The PHA Board Resolution (form HUD-52574) approving the PHA's operating budget must be submitted to the appropriate FO **prior to the beginning of the PHA's fiscal year**. All PHAs are required to prepare an operating budget and submit same to their Board of Commissioners for approval prior to their operating subsidy being approved by HUD. The HUD required Board Resolution form used by the Board of Commissioners to approve the PHA's annual operating budget is Form HUD-52574, PHA Board Resolution, Approving Operating Budget.

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.

PHAs described in paragraph 2 above are required to submit their budgets to HUD electronically by email or they may send a hard copy by US Mail or other carrier.

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.

Financial Management Division is not aware of any duplication of efforts to collect this data. Any data already submitted to HUD will not be requested again.

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 being collected has no significant impact on small businesses or other small entities.

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.

HUD requests program funds annually in the Departmental Budget. Congress appropriates PHA operating funds annually. The operating subsidy funds are obligated to the PHAs annually and can only be obligated by HUD for the year in which the funds were appropriated by Congress.

Therefore, HUD has to fund operating budgets for PHAs annually and cannot collect this information less frequently.

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 to be inconsistent with the guidelines 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.
   - 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 Comment in the *Federal Register*, Volume 84; No. 34; Page 5104, on **February 20, 2019**. The public was given until **April 22, 2019** to comment. HUD received xx comments on this proposed collection.

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

No payments 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.

Assurance of confidentiality is neither provided nor needed because PHA budgets are passed at public Board of Commissioner meetings.

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 sensitive questions are being asked.

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 burden hours and annual costs to respondents are provided in the table below. The hourly cost for response is assuming a Clerk's annual salary of $45,972 at a GS7/1 level rate (Salary Table 2019-GS) or an hourly rate of $33.05. HUD estimates that the annual burden hours for the operating budget required for the 3,041 PHAs for the form HUD-52574 required for all PHAs averages .17 hours each.

PHA Burden Hours and Cost								
HUD Form Number	**Number of Respondents**	**Frequency of Responses**	**Estimated Hours**	**Total Annual Burden Hours**	**X**	**Hourly Rate**	**=**	**Total Annual Cost**
52574	3,041	1	.17	517		$33.05		$17,087
Total								$17,087

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 addition costs to the respondents.

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 form HUD-52574 is based on a Clerk's annual salary of $45,972 at a GS7/1 level rate (Salary Table 2019-GS) or an hourly rate of $33.05), which is $33.05 per hour.

Estimated Annual Cost to the Federal Government – Staff								
HUD Form Number	**Number of Respondents**	**Frequency of Responses**	**Estimated Hours**	**Total Annual Burden Hours**	**X**	**Hourly Rate**	**=**	**Total Annual Cost**
52574	3,041	1	2	517		$33.05		$17,087

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

No changes

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. The OMB approval number and expiration date are on the form. See Exhibit D, the OMB disclosure statement.

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

N/A

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. HUD expects its third-party business partners, including Public Housing Authorities, who collect, use maintain, or disseminate HUD information to protect the privacy of that information in Accordance with applicable law.