

Background

Enclosed for your review is Docket No. FR-7008-N-08, on the Public Housing Flat Rent Exception Request Market Analysis. This Federal Register Notice is a new information collection related to PIH Notice 2015-13, which superseded PIH Notice 2014-12.

Currently, HUD does not require PHAs submitting a flat rent exception request to utilize a specific format or template for their supporting market analyses. Based on feedback from PHAs, this ambiguity complicates the submission process, resulting in PHA confusion, multiple correction requests from HUD, and longer review times. Similarly, HUD review staff indicate that inconsistencies in PHA submissions result in greater demands on internal resources/staffing, higher potential for reviewer error, and few opportunities to realize efficiencies or economies of scale. Creating a customizable, streamlined submission format would respond to stakeholder concerns while retaining the flexibility necessary to reflect individual PHA's market conditions in the analyses.

With this proposed information collection, HUD responds to feedback on the current process and commits to developing one or more templates that will:

1. Streamline the market analysis submission process for PHAs by providing a simplified format, saving PHAs time and reducing the associated costs of hiring contractors to perform this work;
2. Standardize all flat rent exception request market analysis submissions, allowing for a more efficient use of HUD resources and enabling consistent internal file documentation/quality control efforts; and
3. Expedite HUD's review and approval process, resulting in improved levels of service to PHAs and public housing residents.