

Supporting Statement for Paperwork Reduction Act Submission
Office of Public and Indian Housing (PIH): Enterprise Income Verification (EIV) System
– User Access Authorization Form and Rules of Behavior/User Agreement

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.

HUD’s regulations at 24 CFR §§5.216, 5.218, and 5.233, and 24 CFR §908.101, require PHAs to use the Enterprise Income Verification (EIV) system in its entirety to verify tenant employment and income information during mandatory reexaminations of family composition and income, and to reduce administrative and subsidy payment errors in accordance with 24 CFR §5.236 and administrative guidance issued by HUD.

Using EIV as an upfront income verification technique, PHAs can identify, recover, and prevent improper payments before they occur consistent with the *Improper Payments Elimination and Recovery Act of 2010*, 31 U.S.C. 3321, and President Barack Obama’s Executive Order 13520, *Reducing Improper Payments and Eliminating Waste in Federal Programs*, issued November 20, 2009.

The Federal Privacy Act (5 USC 552a, as amended), requires that (1) HUD have appropriate safeguards to protect the information contained in the EIV system (5 USC 552a(e)); and (2) keep an accurate accounting of data disclosed from this system of records; more specifically, the date, nature, and purpose of each disclosure of record to any person or to another agency, and the name and address of the person or agency to whom the disclosure is made (5 USC 552a(c)).

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 authorizing official (the PHA Executive Director or designee) determines which staff need access to the EIV system based upon staff responsibilities and duties. Prior to granting public housing agency (PHA) staff access to the EIV system or authorization to view system-generated content, HUD requires each individual to complete a PDF or Microsoft Word fillable Form HUD-52676. This form enables HUD to: 1) identify the user; 2) verify the type of system access requested; 3) provide the user with HUD’s Rules of Behavior for system usage and information about the user responsibilities to protect data protected under the Federal Privacy Act (5 USC 552a) after access is granted; and 4) obtain the signature of the user certifying the user’s

Signature of Senior Officer or Designee:

Date:

X
Colette Pollard, Departmental Reports Management Officer,
Office of the Chief Information Officer

agreement to the Rules of Behavior and responsibilities associated with his/her use of the EIV system.

For users requesting access to the EIV system, the PHA submits the form via email, fax, or U.S. mail to the designated HUD EIV Coordinator who grants access to the EIV System. For users who will not have access to the EIV system, but who will view system generated information in hard or electronic copy, the form is not sent to the HUD EIV Coordinator for processing, but is kept of file at the PHA.

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 information is collected on a PDF-fillable or Microsoft Word-fillable copy of the Form HUD-52676 document and includes a certification to applicable training and agreeing to the Rules of Behavior. For those individuals who will have access to the EIV system, the form is then emailed, faxed, or mailed to HUD. See Exhibits B1 and B2. At this time, because PHAs must retain a signed and dated copy of each completed Form HUD-52676 in their files, no changes to the method of collection are being considered.

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 is no duplication because no similar information is collected.

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 collection has no significant impact on small businesses.

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.

This information is collected to ensure that only authorized individuals have access to the EIV System. If this information is not collected, HUD will not be in compliance with the Federal Privacy Act. HUD's regulations at 24 CFR 5.233, require PHAs to use the Enterprise Income Verification System (EIV) in its entirety to verify tenant employment and income information during mandatory reexaminations of family composition and income, and to reduce administrative and subsidy payment errors in accordance with 24 CFR 5.236 and administrative guidance issued by HUD.

The EIV System User Access Authorization Form-52676 and Rules of Behavior and User Agreement must be completed by prospective users prior to the public housing agency granting staff access to the EIV system or granting authorization to view system generated content. HUD requires each individual to complete a PDF or Microsoft Word fillable Form HUD-52676 each time an individual requests initial access to the PIH EIV System, and when a user's access is modified, reinstated or terminated. Also, this form must be completed by an individual who will not access the EIV system but will view and/or handle printed or electronic EIV information. This form enables HUD to: 1) identify the user; 2) verify the type of system access requested; 3) provide the user with HUD's Rules of Behavior for system usage and information about the user responsibilities to protect data protected under the Federal Privacy Act (5 USC 552a) after access is granted; and 4) obtain the signature of the user certifying the user's agreement to the Rules of Behavior and responsibilities associated with his/her use of the EIV system.

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 often than quarterly;

If an EIV System user's level of access to the EIV System changes, the user must provide the PHA with updated information in certain sections of the Form HUD-52676. That updated information is in Sections A.10, B, C, and D.

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 that 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 secrets, 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

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.

HUD published a Notice of Proposed Information Collection for Public Comments in the *Federal Register*, Volume 84; No. 81; Page 17871 on April 26, 2019. The public was given until June 25, 2019 to submit comments on the proposed information collection. HUD received no public comments on the proposed information collection.

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

No payment or gift will be provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

No assurance of confidentiality is needed nor are any provided. The information is being collected for the authorization and accountability of all individuals that will access HUD's EIV system. Response to this request for information is required in order for HUD to comply with the Federal Privacy Act's (5 USC 552a) requirement that HUD account for all individuals who will have access to a system containing personally identifying information of individuals assisted by the Federal Government

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 for approval 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.**

*** 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.**

Estimate of the Hour of Burden of the Collection of Information							
Information Collection	Number of Respondents	Frequency of Respondents	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
HUD-52676	13,192	1.04	13,719.68	0.78	10,701.35	\$23.07	\$246,880.14

13. Provide an estimate for 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).

There is no additional annual cost to the respondents or record-keepers resulting from this collection from this collection of information.

14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The estimated annualized costs to the federal government, based on a GS-13/1 rate, are provided in the table below. The GS-13/1 rate is the average salary for a Program Analyst/Public Housing Revitalization Specialist/Portfolio Management Specialist. The hourly cost for cost is assuming an analyst’s annual salary of \$76,687 or an hourly rate of \$36.75. The average amount of time it takes to review the Form HUD-52676 and grant access to the EIV System is approximately 15 minutes. The average amount of time it takes to review a modified access submission and modify the access in the EIV system is approximately 10 minutes.

Total Estimated Annual Costs to the Federal Government:

<u>52676 Submission</u>	<u>Number of Respondents</u>	<u>Total Burden Hours</u>	<u>X</u>	<u>Hourly Rate</u>	<u>Annualized Costs</u>
Initial Submission (15 minutes)	4263 X 0.25	= 1,065.75		\$ 36.75	= \$ 39,166.31
Modified Access Submission (10 minutes)	3419 X 0.167	= 570.97		\$ 36.75	= \$ 20,983.14
Totals	7682.00				\$ 60,149.45

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

The nominal adjustment to the estimated burden hours reported on Item 13 reflects an increase in the number of respondents requesting access or modification of system access based on actual responds received during the past two years. The nominal adjustment to the estimated costs reported reflects an increase in the average annual salary and hourly rate for community and social service occupations.

16. For collections 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 is not 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 will display the OMB control number and new expiration date on all collection instruments. See Exhibit B1 and B2.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methods.