

Paperwork Reduction Act Submission

Please read the instruction before completing this form. For additional forms or assistance in completing this form, 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/Subagency 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. 2577-0287 b. <input type="checkbox"/> None
3. Type of information collection: (check one) a. <input type="checkbox"/> New Collection b. <input type="checkbox"/> Revision of a currently approved collection c. <input checked="" type="checkbox"/> Extension of a currently approved collection d. <input type="checkbox"/> Reinstatement, without change , of previously approved collection for which approval has expired e. <input type="checkbox"/> Reinstatement, with change , of previously approved collection for which approval has expired f. <input type="checkbox"/> Existing collection in use without an OMB control number	4. Type of review requested: (check one) a. <input checked="" type="checkbox"/> Regular b. <input type="checkbox"/> Emergency - Approval requested by c. <input type="checkbox"/> Delegated 5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 6. Requested expiration date: a. <input checked="" type="checkbox"/> Three years from approval date b. <input type="checkbox"/> Other (specify)
For b-f, note item A2 of Supporting Statement instructions.	
7. Title: Alternative Inspections -- Housing Choice Voucher Program	
8. Agency form number(s): (if applicable) N/A	
9. Keywords: Housing, public housing, Housing Choice Voucher (HCV), physical inspections, Housing Quality Standards (HQS)	
10. Abstract: To obtain approval to use alternative inspection methods to satisfy HCV inspection requirements, PHAs submit written information to HUD.	
11. Affected public: (mark primary with "P" and all others that apply with "X") a. Individuals or households e. Farms b. Business or other for-profit f. Federal Government c. Not-for-profit institutions g. <input checked="" type="checkbox"/> State, Local or Tribal Government	12. Obligation to respond: (mark primary with "P" and all others that apply with "X") a. <input checked="" type="checkbox"/> Voluntary b. <input checked="" type="checkbox"/> Required to obtain or retain benefits c. Mandatory
13. Annual reporting and recordkeeping hour burden: a. Number of respondents 2280 b. Total annual responses 33 Percentage of these responses collected electronically 0% c. Total annual hours requested 149 d. Current OMB inventory 0 e. Difference (+,-) 0 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 0 b. Total annual costs (O&M) 0 c. Total annualized cost requested 0 d. Current OMB inventory 0 e. Difference 0 f. Explanation of difference: 1. Program change: 0 2. Adjustment:
15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X") a. <input checked="" type="checkbox"/> Application for benefits e. <input checked="" type="checkbox"/> Program planning or management b. Program evaluation f. Research c. General purpose statistics g. <input checked="" type="checkbox"/> Regulatory or compliance d. Audit	16. Frequency of recordkeeping or reporting: (check all that apply) a. <input type="checkbox"/> Recordkeeping b. <input type="checkbox"/> Third party disclosure c. <input checked="" type="checkbox"/> Reporting: 1. <input checked="" type="checkbox"/> On occasion 2. <input type="checkbox"/> Weekly 3. <input type="checkbox"/> Monthly 4. <input type="checkbox"/> Quarterly 5. <input type="checkbox"/> Semi-annually 6. <input type="checkbox"/> Annually 7. <input type="checkbox"/> Biennially 8. <input type="checkbox"/> Other (describe)
17. Statistical methods: Does this information collection employ statistical methods? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	18. Agency contact: (person who can best answer questions regarding the content of this submission) Name: George Forbes Phone: 202-475-8735

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 collect (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
David Vargas, Assistant Secretary
Real Estate Assessment Center

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.

Section 8(o)(8) of the United States Housing Act of 1937 as amended sets out requirements for Public Housing Agency (PHA) inspections of voucher-assisted units. The 1937 Act requires PHAs to inspect voucher units prior to establishing Housing Assistance Payment (HAP) contracts to verify compliance with housing quality standards established by the Secretary to ensure safe and habitable housing without severely restricting housing choice. The units must also be re-inspected periodically to ensure continued compliance with standards.

On January 17, 2014 the Congress enacted the Consolidated Appropriations Act of 2014 (P.L. 113-76, approved January 17, 2014). Among other changes, under Section 220 of the Transportation, Housing and Urban Development, and Related Agencies Appropriations, Division L (**Exhibit A**) PHAs may streamline their inspection procedures for Housing Choice Voucher (HCV) units by using alternative inspection methods to satisfy compliance with 24 C.F.R. § 982.405(a) for periodic re-inspections under a HAP contract.

In March 8, 2016, the Department published a final rule which among other things streamlined the administrative regulations at 24 CFR subpart I, part 982. PHAs seeking to obtain approval to use inspections conducted for other federal, state, or local housing programs for their HCV units must submit information to the Department of Housing and Urban Development (HUD) to affirm that their selected standards and methods provide the same or greater protections to occupants of dwelling units as the Housing Quality Standards (HQS). The amendments to §§ 982.405 and 982.406 (**Exhibit B**) provide that PHAs electing to use inspection methods and standards other than those used for housing assisted under the HOME Investment Partnerships (HOME) program, housing financed using Low-Income Housing Tax Credits (LIHTCs), or other inspections performed by the Department of Housing and Urban Development (HUD), must submit a copy of the inspection standards and an analysis of how those standards meet or exceed Housing Quality Standards (HQS) to HUD for approval. All requests for approval require the submission of supporting documents to HUD.

PHAs with approved alternative inspection standards must monitor changes to the standards and requirements of their method. If any changes are made, the PHA must submit to HUD a copy of the revised standards and requirements along with a revised comparison to HQS. If the PHA or HUD determines that the revisions would cause the alternative inspection's requirements to no longer meet or exceed the requirements of HQS, the PHA may no longer use that alternative method to satisfy § 982.405(a) inspection requirements for voucher units.

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.

Under the provisions of the Consolidated Appropriations Act of 2014 and as implemented by HUD in § 982.406, PHAs may elect to conduct their inspections of HCV units already under Housing Assistance Payment (HAP) contracts via alternative inspection methods. To qualify, the alternative inspection must be one conducted pursuant to requirements under a federal, state, or local housing program. Non-federal inspection standards or requirements that provide the same or greater protection to occupants of dwelling units as compared to HQS may be used if the PHA submits the proper documentation to HUD and obtains approval.

A PHA that elects to apply to use a non-federal set of alternative inspection standards or requirements must submit the following to HUD for review:

- Cover letter from the Executive Director requesting HUD authorization to use the documented alternate standards or requirements
- A copy of the inspection method it wishes to use
- An analysis of the inspection method that shows it provides the same or greater protection to occupants of HCV units as would HQS.

A PHA using an approved alternative inspection method that determines there are any changes to their inspection standards or requirements must submit the following to HUD for review:

- Cover letter from the Executive Director requesting HUD authorization to continue with the revised alternate standards or requirements
- A copy of the revised inspection method it wishes to use

- An analysis of the revised inspection method that shows it provides the same or greater protection to occupants of HCV units as would HQS.

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 information is not collected by electronic means. HUD will consider ways to implement electronic collection in the future.

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.

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.

Submissions under this collection are at the option of each individual PHA. Should this collection not be conducted, PHAs would be unable to seek and obtain approval for using some types of alternative inspection methods for HCV units as provided in HUD's streamlined regulations at §982.406.

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

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 for Public Comment in the Federal Register, Volume 84; No. 157, Page 40434 on August 14, 2019. The public was given until October 15, 2019 to submit comments on the Proposed Information Collection. HUD received no comments on this Proposed Information 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.

The information being collected does not include any personally identifiable information, so confidentiality is neither provided nor needed.

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 burden hour calculations for tasks performed by PHAs seeking to use alternative inspection methods under § 982.406 are shown by the type of task involved. The calculations are based on the assumption that approximately 1.1% of the 2,280 PHAs with HCV programs will seek approval to implement an alternative inspection method.

Total Burden Hour Estimates						
Type of Burden	Number of Responses	Annual Frequency of Requirement	X	Est. Avg. Time for Requirement (Hours)	=	Est. Annual Burden (Hours)
Initial submission for HUD approval to use alternate inspection method	25	1		5		125
Submission for HUD approval to continue using alternate inspection method after modifications	8	1		3		24
Total						149

The estimated annual cost to respondents to apply for and maintain HUD approval for the use of alternative inspection methods are provided in the table below and assume staff annual salary of \$53,805 at a GS-11/1 level rate (Salary Table 2019-GS), at an hourly rate of \$25.78

Total Estimated Annual Costs to Respondents						
	Number of Responses	Total Burden Hours	X	Hourly Rate	=	Annualized Cost
For all submissions	33	149		\$ 25.78		\$3,841.22

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.

There are no additional costs to 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 alternative inspection methods is based on the 2019 general pay schedule for a GS-13/1 rate, which is \$76,687 annually, or \$36.74 per hour. A GS-13, step 1 salary is the average salary for the analysts who will review the submissions.

Estimated Annual Cost to the Federal Government – Staff								
	Number of Responses	Frequency of Responses	Estimated Hours	Total Annual Burden Hours	X	Hourly Rate	=	Total Annual Cost
Review of PHA-Submitted Documentation	33	1	3	99		\$36.74		\$3,637.26

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

There is no change in burden hours. Sections 14 total dollar cost increased slightly due to increases in the General GS pay scales from 2016 to 2019.

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.

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.