

HUD received numerous comments about the proposed collection and the potential burden it would put on PHAs. HUD has considered these comments and is proposing modifications to reduce burden as much as possible without unduly reducing the utility of these collections. Additionally, commenters made suggestions for the modifications or elimination of particular fields in the data collection. HUD offers the following changes and clarifications to the data collection in response to those comments.

In response to those comments, we have made the following changes.

- PHAs will not be required to report or updating of the individual unit numbers. HUD will try to extrapolate the units under lease from 50058 submissions and will understand that occupancy data for units that are not under lease are not going to be collected by the system. Since most of these units will be already in the 50058 in the PIC system, and HUD plans to link the individual tenant information to the project information through a unique identifying number for each project, the PHA burden associated with this effort should be minimal.
- HUD expects to only ask PHAs to enter new data associated with the PBV HAP Contract when a Rather than having to update in the system every time there are changes at the project, HUD will require PHAs to indicate annually whether there have been any changes to the fields in the system and to update if it is the case (E.G. if a HAP contract has been extended), unless the PHA prefers to update HUD when a PBV HAP contract changes.
- In addition, the following fields will only be applied to specific projects where the field is associated with a prior PHA commitment.
  - Number of Units under AHAP (encouraged)
  - Use Restriction End Date (This field will be limited to projects subject to a use restriction imposed by HUD).
  - Other Related Programs (This field will be encouraged but not mandatory).
  - Population Served: General, Homeless, Veterans, Families Eligible for Supportive Services, Families Receiving Supportive Services, Elderly Family, Disabled Family (HUD is clarifying that PHAs only have to report on the population that the PBV portion of the project is serving).

In addition to this, HUD will attempt to prepopulate as much data as it can from existing systems such as PIC and the RAD resource desk. Though there are issues with using this data as a solution to HUD's lack of systematic and universal information on PBVs at the project level, prepopulating some of this data will reduce some of the data entry burden on PHAs.

Through taking these steps, HUD has substantially reduced the proposed burden on PHAs in several ways. By not requiring several fields and eliminating the requirement to enter unit number information, PHAs will have to enter substantially less information. In addition, through

collecting this information only when fields have changed, the burden amount should be substantially reduced after the first PHA submission. These changes should reduce burden in a significant way without overly sacrificing the important information being collected. HUD thanks commenters for their insight and feedback.

**Commenters expressed concerns about particular fields, and suggested some of this information was already available through PHAs annual plan submission.**

HUD has attempted to address the issue with some particular fields by eliminating them or making them optional. In addition, HUD pledges to attempt to prepopulate the system with as much information as can be extrapolated from existing HUD systems and collections (such as PIC and the RAD Resource Desk).

**Commenters expressed concerns about HUD's stated purpose of risk mitigation, countering that this was masking HUD's true purpose to commit to enforcement actions against PHAs and undermine the PHA's role as contract administrator of Project Based Vouchers.**

HUD recognizes commenters' concerns about enforcement actions and reiterates that its purposes in collecting this data are to allow HUD to better track the PBV inventory, inform Congress and the public about the PBV program, and make informed decisions on risk-mitigation strategies with respect to PBVs. Also as previously stated, HUD intends to address the challenge not systematically collecting information on the development or project level for PBV causes for monitoring. HUD is, and will continue to be, responsible to ensure compliance with key program requirements as an essential function of the agency and as authorized by Congress. HUD greatly appreciates PHAs' roles as contract administrators and intends that a comprehensive project-level PBV database will support that role rather than undermine it. HUD has determined that this collection will reduce unnecessary HUD reviews of PHA operations and provide a structure for needed information to enable HUD and PHAs to manage a large and growing PBV program.

**Commenters expressed concern about the burden involved in this collection as well as questioned the accuracy of the burden estimates.**

HUD appreciates the concerns related to burden expressed by PHAs and will take steps to try to minimize the burdens from PHAs. HUD's estimates of burden are based off of a couple of assumptions. First of all, subsequent submissions to the system to update information should be significantly less burdensome than the initial submission. For example, a PHA extending their HAP contract would not be required to update every additional field unless these had changes as well. This should be an activity that would take significantly less time than the overall estimated burden hours. Similarly, many of these fields are unlikely to change over the course of the HAP contract and would never require the PHA to update it after the first submission. Some commenters suggested that it would be preferable that HUD require PHAs to update this on an annual basis instead of every time one of the data fields collected is changed. As stated above, HUD is adopting this suggestion.

**One commenter noted that HUD’s notice would require their PHA to update the database when a unit turn impacts the following data points: a) Unit Address, b) Unit Bedroom Distribution, and c) the Number and Bedroom Distribution of PBV-Assisted Section 504 Mobility Units at the Project. They state that these are not easily tracked and would result in a big increase in burden for their PHA**

HUD Response: HUD has heard these concerns from a number of PHAs and industry groups. In response, in order to minimize burden without overly sacrificing utility, HUD proposes collecting this information initially and on an annual basis as changes warrant.

**A commenter provided suggestions to HUD with regard to creating data dictionaries, visualizations, geospatial data and timeliness of providing this data to the public.**

HUD Response: These are all important factors that HUD is considering related to this data collection. HUD issued short definitions of the fields in the 60 day PRA but will consider further refining this going forward. HUD will also consider providing this data in a variety of formats in a timely manner as we already do with the limited data available for PBVs on the PBV dashboard. Since providing decisionmakers, researchers and the public more transparency is an important goal of this collection, HUD will work to make this data available in a user friendly manner.

**One commenter urged HUD to reconsider its decision to create a single new portal for PBV data collection.**

HUD Response. It is not HUD’s intention to create an entirely new portal to permanently collect and store this data. As many commenters know, HUD is currently developing an upgrade to the Public and Indian Housing Information Center (PIC), which will be called PIH Information Center- Next Generation (PIC-NG). Because of issues with the current PIC system, HUD does not plan on building this data collection into the existing system and plans to integrate it into a new system going forward.

**One Commenter suggested that HUD Commit to allowing PHAs to enter the initial “one-time submission” for new HAP/AHAP contracts at time of execution and enter all initial submissions for existing contracts at time of contract renewal.**

While HUD appreciate the commenters concerns about burden, and has made efforts to address these in the 30 day PRA. However, allowing such a phase in period could mean it would be decades before a complete data picture of the PBV program would be known.

**One commenter thanked HUD for its clarifications regarding MTW agencies not having to fill out fields, but requests that for other data points not explicitly identified by HUD in the Notice may also not apply to agencies due to the use of MTW waivers or activities, we assume and expect that those agencies may similarly indicate the data point in question is “not applicable”.**

HUD Response

HUD appreciates this concern and does not intend to make mandatory the collection of information on fields that are waived under MTW agreements.