

Supporting Statement for Paperwork Reduction Act Submissions
Section 8 Moderate Rehabilitation Single Room Occupancy (SRO) Program

OMB# 2506-new

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.

The McKinney-Vento Homeless Assistance Act established legislative authority for homeless assistance programs. The purpose of the Multifamily Assisted Housing Reform and Affordability Act of 1997(MAHRA) Act is to retain critical affordable housing resources represented by the supply of Section 8 assisted housing and maintain it in good physical and financial condition. The Section 8 Moderate Rehabilitation Single Room Occupancy (SRO) program collects annual information via the housing assistance program renewal contracts and rent calculation worksheets. The information collected is used to determine program eligibility and the correct amount of renewal rents. The rental assistance renewal payments compensate owners for ongoing cost of owning and maintaining the property. The renewal and replacement of expiring Housing Assistance Payments Contracts are set forth on the following notices:

The renewal authority under Section 524(b)(1) of the (MAHRA) governing the renewal of Housing Assistance Payments (HAP) contracts under the Section 8 Moderate Rehabilitation (SRO) program. See attachment.

The regulations covering Section 8 SRO renewals are contained in 24 CFR Part 402.5 (b) (1-2).

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.

While this is a new collection, this information is collected by Housing and Urban Development (HUD) in order to renew expiring SRO Program Housing Assistance (HAP) contracts. The HAP contract is a written agreement between the Public Housing Authority (PHA) and the property owner for the purpose of providing housing assistance payments to the owner on behalf of an eligible individual. The rent calculation worksheet is completed by the property owner and PHA and submitted to the local HUD's Office of Public Housing by the PHA. The rent calculation worksheet constitutes the renewal request and is used to determine the specified in the HAP contract as payable to the owner.

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 Financial Management Center (FMC) posts the annual inventory of expiring HAP contracts to their SharePoint site and notifies HUD Public Housing Field Offices (FO) when posted. The FO will access the SharePoint website when they are ready to submit renewal or replacement information for an expiring SRO unit. Next, the FMC will review and calculate the renewal funding needs based on the data provided. The SharePoint will calculate the funding based on the data entered. When the FMC receives the funding package back from HUD Headquarters, it will be prepared and distributed to the FMC's financial analysts where they will process the funding in HUDCAPS.

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.

This is a new collection as described in item 2 above. CPD is not aware of any duplication in effort, or where any of the information being collected is already available from an existing source.

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.

As indicated in Item 5 of OMB Form 83-I, there is no significant economic impact on the Public Housing Authorities and property owners who are requesting renewal funding under this program.

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.

If the collection (SRO renewal requests) is not conducted as each HAP contract expires, ongoing rental assistance will cease upon expiration. The likely result will be the assisted program participants will lose their housing and be at risk of returning to homelessness.

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; **NA**
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; **NA**
- requiring respondents to submit more than an original and two copies of any document; **NA**
- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years; **NA**
- 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; **NA**

- requiring the use of a statistical data classification that has not been reviewed and approved by OMB; **NA**
- 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 **NA**
- 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. **NA**

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.

- 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.

SNAPS did not directly consult with PHAs on this collection. Rather, the Financial Management Center (FMC) which collect the SRO renewal requests was asked to provide any feedback it had received from Office of Public Housing field office staff who collect the renewal requests directly from the PHAs. No feedback from PHAs has been reported on this collection burden.

- 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.

The field offices will consult with the local PHAs at a minimum annually in order to receive the renewal requests (the information collection). Any comments from the PHAs on their views on availability of data, frequency of collection and to provide clarity of instructions can be received at that point.

In accordance with the Paperwork Reduction Act of 1995, the Department of Housing and Urban Development published a notice in the Federal Register on January 6, 2020 (vol 85, page 519). No comments were received.

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

NA

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

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The Privacy Act of 1974 provided privacy protection to respondents. There are no assurances of confidentiality provided.

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.

NA. Such private information of sensitive nature is not collected.

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.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
HAP	378.00	1.00	378.00	2.00	756.00	\$41.66	\$31,494.96
Rent Calculation Worksheet Addendum	378.00	1.00	378.00	3.00	1,134.00	\$41.66	\$47,242.44

Total					1,890.00		\$78,737.40
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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.

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.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Respons	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
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HAP Contract	378.00	1.00	378.00	2.00	756.00	\$41.66	\$31,494.96

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

This is the initial submission of this collection, therefore, there are no changes or adjustments.

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.

A notice on the SRO renewal process will be published which explains how the collected information will be used to determine the renewal rent for the expiring SRO contract. HUD does not publish the results of the annual collection, which is the renewal rents for all the expiring SRO contracts. The authorizing statute for the renewal of SRO contracts does not require such a publication.

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.

NA

18. Explain each exception to the certification statement identified in item 19.

NA

B. Collections of Information Employing Statistical Methods