

Supporting Statement for Paperwork Reduction Act Submissions

HUD-Owned Real Estate- Good Neighbor Next Door Program OMB Control Number 2502-0570

HUD-9549, HUD 9549-A, HUD 9549-B, HUD 9549-C, HUD 9549-D, 9549-E

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 204(g) of the National Housing Act (12 U.S.C., 1710(g)) provides the Secretary of the Department of Housing and Urban Development (Department or HUD) with the authority to sell real and personal property acquired by the Secretary on such terms and conditions as the Secretary may prescribe. HUD's implementing regulations are set forth in Title 24 of the Code of Federal Regulations (CFR) Part 291 (24 CFR Part 291), Disposition of HUD Acquired And Owned Single Family Property.

The authority to operate the Good Neighbor Next Door (GNND) Sales Program is found in HUD's regulations at 24 CFR Part 291, Subpart F, 291.500 through 291.565. Program standards and guidance are provided in HUD's Federal Housing Administration (FHA) Single Family Housing Policy Handbook 4000.1 (Handbook 4000.1), Sections II.A.8.o., III.A.3.g., and IV.B.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.**

Within the general property disposition program, HUD administers special disposition programs targeting special market groups or policy goals. The information collection activity covers the GNND Sales Program where the purpose is to improve the quality of life in distressed urban communities. This is to be accomplished by encouraging the respondents, are law enforcement officers, teachers, and firefighters/emergency medical technicians, to purchase and live in single family HUD-owned properties that are in the same communities where they perform their daily responsibilities and duties. In addition, participants must meet the eligibility criteria under the Good Neighbor Next Door Sales Program.

This information collection is used in binding contracts between the purchaser and HUD in implementing the GNND Sales Program. Form HUD-9548, *Instructions for Sales Contract Property Disposition Program*, and addendums are submitted simultaneously with the information collection. However, the form HUD-9548 collection is reported under existing

OMB control number 2502-0306. The information collected will be retained by the Department as part of the transaction record for a property disposition action.

Following are the names and the use of information in this collection.

Form HUD-9549, *Good Neighbor Next Door Sales Program Personal Information*

Questionnaire, is collected to determine and document eligibility to participate in the GNND Sales Program. The respondents are purchasers of single-family HUD-owned properties, who are teachers, law enforcement officers, and firefighters/emergency medical technicians. (24 CFR 291.500 and Handbook 4000.1)

Form HUD-9549-A, *Good Neighbor Next Door Sales Program - Law Enforcement Officer*

Pre-Qualification Questionnaire, is a self-certification by a prospective participant in the GNND Sales program representing themselves as an eligible law enforcement officer. This information is collected to determine and document eligibility to participate in the GNND Sales Program. (24 CFR 291.500, 291.505, and 291.520 and Handbook 4000.1)

Form HUD-9549-B, *Good Neighbor Next Door Sales Program - Teacher-Pre-Qualification*

Questionnaire, is a self-certification by a prospective participant in the GNND Sales Program representing themselves as an eligible teacher that gives direct services to students in grades pre-kindergarten through 12. This information is collected to determine and document eligibility to participate in the GNND Sales Program. (24 CFR 291.500, 291.505, and 291.525 and Handbook 4000.1)

Form HUD-9549-C, *Good Neighbor Next Door Sales Program - Firefighter/Emergency*

Medical Technician Pre-Qualification Questionnaire, is a self-certification by a prospective participant in the GNND program representing themselves as an eligible firefighter/emergency medical technician. This information is collected to determine and document eligibility to participate in the GNND Sales Program. (24 CFR 291.500, 291.505, and 291.530 and Handbook 4000.1)

Form HUD-9549-D, *Good Neighbor Next Door Sales Program – Participant Continuing*

Eligibility Certification, is completed by the qualifying purchaser of the GNND property as an annual self-certification of continuing eligibility under GNND Sales Program rules. (24 CFR 291.565 and Handbook 4000.1)

Form HUD-9549-E, *Employer Verification of Participant Employment Property Disposition*

Program Good Neighbor Next Door Sales Program Agency’s Certification of Employment, is completed by the employer of the qualifying purchaser confirming that the purchaser is a teacher, law enforcement officer, or firefighter/emergency medical technician. This information is collected to determine and document eligibility to participate in the GNND Sales Program. (24 CFR 291.515 and Handbook 4000.1)

Participant’s Request to Interrupt 36-Month Owner-Occupancy Term information is collected according to 24 CFR 291.540 and Handbook 4000.1. If a GNND participant requires an interruption to the owner-occupancy term, the participant may request approval for a term interruption from HUD.

- 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.**

HUD's Asset Disposition and Management System (ADAMS-P260) tracks the activity of a HUD real estate owned (REO) single-family property from acquisition through final sale. Information collections for the GNND Sales Program are used as part of the collection effort. Specifically, the forms are collected electronically and submitted by email from contractors to the Management and Marketing contractors, and then to HUD. In May 2017, HUD implemented electronic signature technology to electronically sign the forms included in this collection of information that provide a binding contract between the property purchaser and HUD.

- 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.**

The GNND Sales program is a stand-alone program, and the information collected is not duplicative.

- 5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.**

The information collected does not have a significant economic impact on a substantial number of small entities. HUD-approved real estate brokers with an active Name/Address Identifiers (NAID) submitting offers on behalf of prospective GNND Sales Program participants may include small entities. The equipment required to access and process the information collection is desktop or equivalent computers typically found in any real estate sales office.

- 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.**

The information collected is the minimum needed to implement the GNND Program using appropriate management control tools and to protect against fraud and abuse.

- 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;*

Respondents provide information on a transactional basis (prior to closing or at annual certification.)

** requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*

Respondents provide information on a transactional basis (prior to closing or at annual certification.)

**** require respondents to submit more than an original and two copies of any document;***

The respondents are not required to submit more than an original and two copies of any document.

**** requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;***

The respondents are not required to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years.

**** 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;***

The respondents are not required 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.

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

The respondents are not required to use of a statistical data classification that has not been reviewed and approved by OMB.

**** that included 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***

The respondents are not required to submit information 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.

**** 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.***

The respondents are not required 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.

- 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 on the data elements to be recorded, disclosed, or reported. 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 may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The agency notice soliciting comments on the information collection was published in the Federal Register on XXXday, XMonth, 2020 (Volume XX, Number XXX, Page XXXXX). No comments were received.

HUD had discussions with the four listed regional Homeownership Center (HOC) REO Directors regarding the collection of information requirements in the GNND Sales Program.

- Ralph Jackson, Atlanta HOC
- Andrew Eckel, Denver HOC
- Michael Curry, Philadelphia HOC
- Tammy Massone, Santa Ana HOC

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

Other than remuneration of contractors and sales commission payments to real estate brokers submitting selected offers, no gift or other type payments are made to the respondents.

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

The Privacy Act of 1974 (Pub. L. No.93-579, 88 Stat. 1896, 5 U.S.C. 552a) protects respondents who meet the information reporting requirements.

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.

This information collection does not contain any questions of a sensitive nature.

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.**

The following are assumptions to the estimates of the burden hours of the collection of information.

- An average of 178 annual sales of HUD properties acquired and sold under the GNND Sales Program from 1/1/2017 through 12/31/2018 with approximately 4 offers submitted for each sale.
- HUD estimates that 26 participants in each calendar year will submit a written request by letter or email for permission to interrupt the required occupancy period.

Information Collection	Number of Respondents	Frequency of Response	Annual Responses	Average Burden Hours Per Response	Annual Burden Hours	Hourly Cost per Response	Total Annual Cost
HUD-9549	178	4	712	0.08	56.96	\$31.00	\$1765.76
HUD-9549-A	56	4	224	0.08	17.92	\$31.00	\$555.52
HUD-9549-B	98	4	392	0.08	31.36	\$31.00	\$972.16
HUD-9549-C	24	4	96	0.08	7.68	\$31.00	\$238.08
HUD-9549-D	178	1	178	0.08	14.24	\$31.00	\$441.44
HUD-9549-E	178	1	178	0.08	14.24	\$31.00	\$441.44

Request to Interrupt 36 Month Occupancy Term	26	1	26	0.50	13.00	\$31.00	\$403.00
Totals	738		1,806		00		0

The hourly rate is based on a Real Estate Broker and Sales Agent national mean annual salary of \$65,240 where hourly rate is rounded to nearest dollar amount at \$31.

13. Provide an estimate for 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 and 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 collections 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 the respondents.

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.

Information Collection	Annual Responses	Review/ Completion by HUD Staff	Average Burden Hours Per Response	Annual Burden Hours	Hourly Cost per Response	Total Annual Cost
HUD-9549	712	712	0.03	21.36	\$41.37	\$883.66
HUD-9549-A	224	224	0.03	6.72	41.37	\$278.01
HUD-9549-B	392	392	0.03	11.76	\$41.37	\$486.51
HUD-9549-C	96	96	0.03	2.88	\$41.37	\$119.15
HUD-9549-D	178	178	0.03	5.34	\$41.37	\$220.92
HUD-9549-E	178	178	0.03	5.34	\$41.37	\$220.92
Request to Interrupt 36 Month Occupancy Term	26	26	0.50	13.00	\$41.37	\$537.81
Totals	0	0		00		0

The hourly cost is based on estimated GS12 CY2020 salary of \$86,335 annually.

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

This is an extension of a currently approved information collection. The collection has been updated with new estimates to represent the Department’s current decrease in HUD REO inventory, thus reducing GNNND Sales Program activity. This current level of activity resulted in a decline with respondents, responses and burden hours. The forms associated with this information collection are revised with minor edits to the language contained in the form.

Form Number	Revision
HUD-9549	Non-substantive revision to Privacy Act Notice; added certification to meet false statement liability under the Program Fraud Civil Remedies Act (PFCRA).
HUD-9549-A	Non-substantive revisions to items #1,2,5 and 6, added certification to meet false statement liability under the PFCRA.
HUD-9549-B	Revision to #6 Bullet,

	<p>Removed language</p> <ul style="list-style-type: none"> • “Your good faith intention to maintain employment as a teacher for the first year of occupancy of the home you purchase.” <p>And Replaced With</p> <ul style="list-style-type: none"> • “Your good faith intention to continue employment as a teacher for at least one year after date of closing.” <p>Non-substantive revisions to Privacy Act Notice and #5, added certification to meet false statement liability under the PFCRA.</p>
HUD-9549-C	Non-substantive revisions to items #1,4, and 5, added certification to meet false statement liability under the PFCRA.
HUD-9549-D	Added Public reporting burden statement, added certification to meet false statement liability under the PFCRA.
HUD-9549-E	<p>Removed language</p> <ul style="list-style-type: none"> • “a Teacher, who, for purposes of the GNND Sales Program, is defined as an individual employed full time by a state-accredited public school or private school, as a classroom teacher in grades pre-K through 12 and that this agency serves students from the community, neighborhood, or jurisdiction of the unit of general local government, or Indian tribal government in which the home is located; or” <p>And Replaced With</p> <ul style="list-style-type: none"> • “a Teacher, who, for purposes of the GNND Sales Program, is defined as an individual who is employed as a full time teacher by a state-accredited public school or private school that provides direct services to students in grades pre-Kindergarten through 12 and serves students from the community, neighborhood, or jurisdiction of the unit of general local government, or Indian tribal government where the home is located; or” <p>Added certification to meet false statement liability under the PFCRA.</p>

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.

There are no plans to publish this collection of information for statistical use.

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 avoid displaying the expiration date.

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 identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB Form 83-I.

B. Collections of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked, "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

2. Describe the procedures for the collection of information including:

- * Statistical methodology for stratification and sample selection,**
- * Estimation procedure,**
- * Degree of accuracy needed for the purpose described in the justification,**
- * Unusual problems requiring specialized sampling procedures, and**
- * Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

3. Describe methods to maximize response rates and to deal with issues of non-response.

The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

This collection of information does not employ statistical methods.