



Does this information collection employ statistical methods?

Yes  No

Name: Anice Chenault  
Phone: FSS@hud.gov

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## 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 collected (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.

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Signature of Program Official:

Date:

X Robert Mulderig, Acting Deputy Assistant Secretary, Office of Public Housing Investments

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Signature of Senior Officer or Designee:

Date:

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

# Supporting Statement for Paperwork Reduction Act Submissions

## A. Justification

1. The Family Self-Sufficiency (FSS) Program is authorized under Section 23 of the United States Housing Act of 1937. The purpose of the FSS program is to develop local strategies to coordinate the use of public housing and Section 8 housing choice voucher rental assistance with support services provided by public and private resources to enable families to achieve economic independence and self-sufficiency.
2. Each Public Housing Agency (PHA) carrying-out a local FSS Program must enter into a Contract of Participation (Form HUD-52650) with each eligible family that opts to participate in the program. The contract enumerates the services of the local FSS Program that are made available to tenants, as well as the responsibilities and obligations of the participating family. The Contract of Participation is required by law (Section 23(c) of the U. S. Housing Act of 1937, as added by Section 554 of the Cranston-Gonzales National Affordable Housing Act, P.L. 101-625).

Each PHA must consult with local officials to develop an Action Plan containing descriptions of the size, characteristics, and needs of the population to be served by its proposed self-sufficiency program; the services and activities to be provided by both public and private resources to FSS families; how the program will be implemented; a time-table for implementation; a certification of coordination in the development of the services and activities; and other information necessary for HUD to determine the soundness of the PHA's proposed FSS program. The Plan will be submitted to HUD as required by law (Section 23 (g) of the U. S. Housing Act of 1937 as added by Section 554 of the Cranston-Gonzalez National Affordable Housing Act, P.L. 101-625).

PHAs must establish an FSS escrow account for each family participating in the program. The amount of the escrow credit is based on increases in the family's total tenant payment resulting from increases in the family's earned income during the term of the FSS contract. PHAs may use Form HUD-52652, FSS Escrow Account Credit Worksheet, to determine escrow credit for each participating family.

Submittal of annual reports to HUD is required by law (Section 23(1) of the U. S. Housing Act of 1937, as added by Section 554 of the Cranston-Gonzalez National Affordable Housing Act, P. L. 101-625). PHAs generally fulfill their annual FSS reporting requirements by completion of the FSS addendum to the Form HUD-50058. The burden hours for the reporting through the HUD-50058 are covered under OMB control number 2577-0083.

The application form, HUD-52651, for FSS Program Coordinator funding is necessary to ensure compliance with Section 102 of the Department of Housing and Urban Development Reform Act of 1989 (42 U.S.C. 3545) (HUD Reform Act) and the regulations codified in 24 CFR part 4, subpart A which contain provisions to ensure greater accountability and integrity in provision of assistance administered by HUD. Additional forms used in the application package are the SF-424, OMB approval # 0348-0043; SF-LLL, OMB approval # 0348-0046,

3. As part of the ongoing implementation of the Electronic Government (E-Government) component of the President's Management Agenda, all application packages for funding of salaries for Family Self-Sufficiency coordinators are submitted to HUD electronically by PHAs. In addition, information from each family's Escrow Credit Worksheet, HUD-52652, and FSS Contract of Participation, HUD-52650, is submitted to HUD electronically by PHAs using the HUD-50058, Family Report.
4. There is no duplication of effort. Information collected is unique to each participant and does not duplicate any similar information.
5. The information being collected has no significant impact on small businesses or other small entities. The burden associated with such collection of information is the minimum needed for program monitoring.
6. Federal program requirements, policy activities and statutory mandates would not be met if the collection is not conducted, or is conducted less frequently. This information must be collected so that funds for the salaries of FSS coordinators may be awarded timely to qualified applicants.

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. HUD published a Notice of Proposed Information Collection for public comments in the Federal Register, Volume 85; Number 147; Page 45917 on July 30, 2020. The public was given until September 28, 2020, to submit comments on the Proposed Information Collection. HUD received no public comments on this Proposed Information Collection.

9. No payment or gifts to respondents are provided.

10. Assurance of confidentiality is neither provided nor needed.

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. No sensitive questions are being asked.

12. Estimated Annual Reporting and Recordkeeping Burden

Information Collection	Number of Respondents	# of Responses per Respondents	Total Annual Responses	Burden Hours/Minutes per Response	Total Burden Hours	Hourly Cost	Total Annual Cost
SF424 - Application for Federal Assistance	800	1	800	0	0		
SF LLL - Disclosure of Lobbying Activities	40	1	40	0	0		
HUD 2880- Applicant/Recipient/Disclosure/Update Form (OMB No. 2510-0011)	800	1	800	0	0		
HUD-52755 - Sample Contract Admin. Partnership Agreement (2577-0229)	40	1	40	0	.17	7	
HUD-52651 - FSS Application	800	1	800	1.50	1,200	37.13	44,556.00
Subtotal (Application)	800	1	800	1.50	1,200	37.13	<b>\$44,556.00</b>
Action Plan	20	1	20	10	200	37.13	\$7,426.00
HUD-52650 - Contract of Participation	900	10	9,000	.25	2,250	37.13	\$83,542.50
HUD-52652 - Escrow Account Credit Worksheet	740	100	74000	.85	62900	37.13	\$2,335,477.00
HUD-1044 – Grant Agreement*	700	1	700	0	0		
Annual Report (Narrative)	700	1	700	1	700	37.13	\$25,991.00
HUD-50058 – Family Report (OMB No. 2577-0083)	740	100	74000	0	0		
Subtotal (Program Reporting/Recordkeeping )	740	213		12.1	66050	37.13	\$2,452,436.50
Total	<b>740</b>	<b>Varies</b>	<b>Varies</b>	<b>Varies</b>	<b>67,250</b>	37.13	<b>\$2,496,992.50</b>

\*HUD-1044, Award/Amendment is completed by HUD staff, signed by the recipient of the grant, and returned to HUD. This form is a certification and HUD ascribes no burden to its use.

Burden hours for forms showing zero burden hours in this collection are reflected in the OMB approval number cited or do not have a reportable burden.

The estimate of the total annual cost burden to respondents/recordkeepers resulting from the collection of this information is: **67,250 burden hours x \$37.13 per hour = \$2,496,992.50**; assuming an hourly rate at the GS-12/Step 1 level.

13. There are no additional costs to the respondents.

14. Estimated annualized cost to the Federal Government for this collection:

	No. of Responses	Hrs. Per Response	Annual Hrs	Cost Per Hr.	Cost to Fed/yr
Action Plan	20	2	40	\$37.13*	\$1485.2

Reporting	700	0.5	400	\$37.13	\$12,995
Funding Application	750	4	3,000	\$37.13	\$111,390
<b>Total Cost</b>					<b>\$125,870.20</b>

\*Assumes an hourly rate at the GS-12/Step1 level.

15. The Department is seeking to establish a collection that encompasses data from public housing agencies that administer the HUD’s FSS program, and its participants. The HUD-2994 “You Are Our Client” form is removed, because it is not used. Action Plans increased from 5 to 20 because the number of new programs has increased. The HUD-52652 Escrow Credit Worksheet and HUD-50058 Family Report numbers of respondents have been adjusted to conform with the number of participants that appear in the PIC system. We would expect one response per participant each year.
  
16. The information collection results will not be published; the funded grant awards will be published as required by the HUD Reform Act.
  
17. The expiration date and the OMB approval number will be displayed in the Notice of Funding Availability and on all related forms.

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**B. Collections of Information Employing Statistical Methods**

This collection of information does not employ statistical methods.