

# 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/Sub agency Originating Request: <b>U.S. Department of Housing and Urban Development</b> Office of Public and Indian Housing		2. OMB Control Number: a. 2577-0241 b. <input type="checkbox"/> None <span style="float:right">B</span>	
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 type="checkbox"/> Extension of a currently approved collection d. <input type="checkbox"/> Reinstatement, <b>without change</b> , of previously approved collection for which approval has expired e. <input checked="" type="checkbox"/> Reinstatement, <b>with change</b> , of previously approved collection for which approval has expired f. <input type="checkbox"/> Existing collection in use without an OMB control number For b-f, note item A2 of Supporting Statement instructions.		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)	
7. Title: <b>Exigent Health and Safety Deficiency Correction Certification</b>			
8. Agency form number(s): (if applicable) None			
9. Keywords: Housing, Safety, Health, Deficiency, Inspections			
10. Abstract: Public Housing Agencies (PHAs) correct/mitigate exigent health and safety (EHS) deficiencies cited in property inspections conducted pursuant to HUD's Uniform Physical Condition Standards (UPCS) inspection protocol. Through the web-based template, PHAs electronically certify that they have corrected/mitigated the EHS deficiencies.			
11. Affected public: (mark primary with "P" and all others that apply with "X") a. Individuals or households b. <input checked="" type="checkbox"/> Business or other-for-profit c. Not-for-profit institutions e. Farms f. Federal Government 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. Voluntary b. Required to obtain or retain benefits c. <input checked="" type="checkbox"/> Mandatory	
13. Annual reporting and recordkeeping hour burden: a. Number of respondents <span style="float:right">976</span> b. Total annual responses <span style="float:right">976</span> Percentage of these responses collected electronically <span style="float:right">100%</span> c. Total annual hours requested <span style="float:right">329.19</span> d. Current OMB inventory <span style="float:right">273.00</span> e. Difference (+, -) <span style="float:right">+56.19</span> f. Explanation of difference: 1. Program change: 2. Adjustment: <span style="float:right">+56.19</span>		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 <span style="float:right">N/A</span> b. Total annual costs (O&M) <span style="float:right">\$0.00</span> c. Total annualized cost requested <span style="float:right">\$0.00</span> d. Current OMB inventory <span style="float:right">\$0.00</span> e. Difference <span style="float:right">\$0.00</span> f. Explanation of difference: 1. Program change: 2. Adjustment:	
15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X") a. Application for benefits b. <input checked="" type="checkbox"/> Program evaluation c. General purpose statistics d. Audit e. Program planning or management f. Research g. <input checked="" type="checkbox"/> Regulatory or compliance		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 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 checked="" type="checkbox"/> Annually 7. <input type="checkbox"/> Biannually 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: Lora Routt Phone: 202-475-8648	

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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 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:  Deputy Assistant Secretary Real Estate Assessment Center  X	Date:
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Signature of Senior Officer or Designee:  X Colette Pollard, Departmental Reports Management Officer, Office of the Chief Information Officer	Date:
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# 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.**

The Department's Uniform Physical Condition Standards (UPCS) regulation (24 CFR part 5, subpart G) provides that HUD housing must be decent, safe, sanitary, and in good repair. The UPCS regulation also provides that all area and components of the housing must be free of health and safety hazards.

HUD conducts physical inspections of the HUD assisted housing (see 24 CFR §5.701) and in particular public housing, to determine if the UPCS standards are being met. Pursuant to the UPCS inspection protocol, at the end of the inspection (or at the end of each day of a multi-day inspection) the inspector provides the property representative with a copy of the "Notification of Exigent and Fire Safety Hazards Observed" form. Each exigent health and safety (EHS) deficiency that the inspector observed that day is listed on the form. The property representative signs the form acknowledging receipt.

Public housing agencies, (PHAs) are required to correct, remedy or act to abate EHS deficiencies within 24 hours (Public Housing Assessment System (PHAS) regulation at 24 CFR section 902.22(f) ; **Exhibit A**). PHAs also are to notify the Department within three business days of the date of inspection, which is the date the PHA was provided notice of these deficiencies, that the deficiencies were corrected/remedied/acted on to abate within the prescribed time frame.

- 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.**

HUD uses the data it collects to monitor compliance with regulatory requirements and to assist in ensuring the correction of EHS deficiencies on HUD assisted housing. HUD staff reviews the certifications and conducts applicable follow-up activities.

Attached and labeled Exhibit B is a copy of the templates PHAs complete online, via the internet, to certify to the correction, remedy or actions taken to abate the EHS deficiencies cited in the inspection reports. Upon completion of all of the required screens, the PHA transmits the data to HUD. The required OMB Disclosure appears on the screen when the PHAs enter the system to complete and submit the EHS Certificate, see page 5 of Exhibit B.

- 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 (item 13b1 of OMB form 83-i).**

The requested data is transmitted to HUD electronically, increasing data accuracy and reducing respondent burden. Should a PHA not be able to submit this information electronically due to an administrative or cost burden, the PHA may be approved to submit the required information manually.

- 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 could be used or modified.

**5. Does the collection of information impact small businesses or other small entities (item 5 of OMB form 83-i)? Describe any methods used to minimize burden.**

The only entities that possibly may be adversely impacted by any costs associated with HUD's electronic reporting requirement are small PHAs that do not have any, or have limited, web access and computer experience. Any possible adverse impact is lessened due to the frequency of when inspections are conducted, as set forth in 24 CFR 902.13 of the PHAS rule. The Department has guides available on the HUD website, provides training, and offers other technical assistance on this process

**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.**

PHAS requires that PHAs correct/remedy/act to abate EHS deficiencies within 24 contiguous hours of the notice of the deficiency and that PHAs certify to HUD within three business days that the EHS deficiencies have been corrected/remedied/acted upon to abate within that 24 hour period. Without this information, HUD's interest (as well as the interest of taxpayers) will be unprotected and HUD will not be able to identify the risks due to neglected maintenance of HUD assisted housing. Because the deficiencies are life threatening it is in the best interest of the residents that the PHAs ensure all identified EHS deficiencies are immediately corrected/remedied/or acted on to abate. The evaluation of this data may impact funds used to achieve HUD program obligations, or to detect fraud, waste and abuse.

**7. Explain any special circumstances that would cause an information to be collected in a manner:**

Because the electronic submission process requires respondents to submit confidential data, HUD has provided each program participant with a unique user identification code, limited the information available via its assessment system to employees with approved security access to the system, and allowed submitters "read-only" capability that will allow them to view their submitted data via the Internet.

- 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. Identify the date and page number of the *Federal Register* notice (and provide a copy) soliciting comments on the information. Summarize public comments and describe actions taken by the agency in response to these comments. Describe all efforts to consult with persons outside the agency to obtain them.**

The Department published a Notice of Proposed Information Collection for Public Comment in the *Federal Register* on September 4<sup>th</sup>, 2020, Volume 85, Page 55314. The public was given until November 3<sup>rd</sup>, 2020 to submit comments. No comments were received.

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

No payments or gifts are provided.

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

All data that can be linked to a particular PHA is secured from public access. When a PHA submits data electronically to HUD, security prevents users outside of HUD from intercepting this data. HUD's web access security system ensures that all management data is secure. The authorities or justifications for the security system are: the Information Security HUD Handbook 2400.24, the Computer Security Act of 1987, the Clinger-Cohen Act of 1996, OMB Circular A-130 part 3, and the Government Information Security Reform Act of 2000 (GISRA). The Department's web access security system allows users to apply online for an ID and password and to reset a forgotten password. It also controls and limits access to systems for authorized users by managing the roles and responsibilities for each user of each system.

There are primary and secondary users. Secondary users are granted read-only access to the system. (This is similar to the access that users submitting information have; however, the user only is able to see his/her submission.) HUD authorized primary users (i.e., selected staff) have security access to update the information, with strict controls of the tasks that they may perform.

- 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.**

No such questions are 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. Read the complete instructions on the form 83i.**

The estimated burden hours for the collection of this data are provided in the tables below. The annual burden hours are calculated using the average number of PHAs that will respond each year. Only PHAs that have EHS deficiencies observed during the physical inspections of their properties enter information in this system. And, pursuant to 24 CFR 902.13 of PHAS rule, not all public housing properties are inspected annually.

The burden hour calculations are based on the number of EHS deficiencies identified during the inspection of all of the properties operated by a PHA. All of the calculations assume that the time to complete the template depends on the number of EHS deficiencies because PHAs are required to input data for each observed EHS deficiency.

Information Collection	Number of Respondents	*Average # of Responses per Respondent	Total Annual Responses	Burden Hours per Response	Total Hours	**Hourly Cost	Total Annual Cost
Physical Assessment Subsystem (PASS) # of EHS Deficiencies 1-2	384	1	384	0.12	46.08	31.70	\$1,460.74
Physical Assessment Subsystem (PASS) # of EHS Deficiencies 3-5	241	1	241	0.17	40.97	31.70	\$1,298.75
Physical Assessment Subsystem (PASS) # of EHS Deficiencies 6-10	159	1	159	0.33	52.47	31.70	\$1,663.30
Physical Assessment Subsystem (PASS) # of EHS Deficiencies 11-20	99	1	99	0.83	82.17	31.70	\$2,604.79
Physical Assessment Subsystem (PASS) # of EHS Deficiencies 21-50	64	1	64	1.0	64.00	31.70	\$2,028.80
Physical Assessment Subsystem (PASS) # of EHS Deficiencies 51+	29	1	29	1.5	43.50	31.70	\$1,378.95
Subtotals	976		976		329.19		\$10,435.33

Totals 976 Total Responses: 976 Total Hours: 329.19

\*Average Number of Responses per Respondent = Total Annual Responses / Number of Respondents

Total Estimated Annual Costs to Respondents						
	Number of Respondents	Total Burden Hours	X	Hourly Rate	=	Annualized Cost
<b>PHA Submissions</b>	976	329.19		\$31.70**		\$10,435.33

\*\* Hourly cost for response assuming a GS-12, Step 1 (\$66,167), Analyst or Manager, hourly rate is \$31.70.

**13. Estimate of the annual cost to respondents or recordkeepers (do not include the cost of hour burden shown in Items 12 and 14). Read the complete instructions on the form 83i.**

There are no additional costs to respondents.

**14. Estimate annualized costs to the Federal government.**

The estimated annualized costs to the federal government, based on a GS-12, Step 1 rate are provided below. A GS-12 Step 1 rate is the average salary for a Field Office Analyst/Manager.

<b>Total Estimated Annual Costs to the Federal Government</b>						
	<b>Number of Respondents</b>	<b>Total Burden Hours</b>	<b>X</b>	<b>Hourly Rate</b>	<b>=</b>	<b>Annualized Cost</b>
<b>PHA Submissions</b>	976	164.6		\$31.70 **		\$5,217.82

\*\* Hourly cost for response assuming a GS-12, Step 1 (\$66,167), Analyst or Manager; hourly rate is \$31.70.

**15. Explain any program changes or adjustments reported in items 13 and 14 of the OMB Form 83i.**

The negligible adjustment in the annual burden hours is due to the redistribution of the number of EHS deficiencies per PHA based on a review of the most recent four years of inspection data. The adjustment (increase) in the number of annual respondents is based on the frequency of assessments and physical inspections established in the PHAS rule.

**16. If the information will be published, outline plans for tabulation and publication.**

None of the information collected will 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. The OMB number and the new expiration date will be displayed on a "Disclosure Statement" that will be the first screen that is viewed on the automated form after OMB approval is received.

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

There are no exceptions to item 19 of the OMB 83-I.

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

There are no collections of information employing statistical methods.