

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: U.S. Department of Housing and Urban Development Office of Public and Indian Housing		2. OMB Control Number: a. 2577-0216 b. <input type="checkbox"/> None B	
3. Type of information collection: (check one) a. <input type="checkbox"/> New Collection b. <input checked="" type="checkbox"/> Revision of a currently approved collection c. <input type="checkbox"/> Extension of a currently approved collection d. <input type="checkbox"/> Reinstatement, without change , of previously approved collection for which approval has expired e. <input type="checkbox"/> Reinstatement, with change , 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: Moving to Work Demonstration			
8. Agency form number(s): (if applicable) HUD Form 50900 Elements for the Annual MTW Plan and Annual MTW Report			
9. Keywords: 'Housing, public housing, public housing authorities, MTW, Moving to Work, fungible'			
10. Abstract: Moving to Work (MTW) is a long-term demonstration program authorized in 1996 and expanded in 2016 that permits select Public Housing Agencies (PHAs) to implement certain programmatic flexibilities to address local needs. To join the MTW demonstration, PHAs submit application materials to HUD requesting MTW designation and describing plans to implement MTW flexibilities. Normally, all PHAs are required to submit the 5-Year and Annual Plan to HUD, however, the 39 existing MTW PHAs with a Standard MTW Agreement must submit an Annual MTW Plan and Annual MTW Report in lieu of the standard PHA plan documents. As the 2016 MTW Expansion Statute directs, HUD is authorized to expand the MTW demonstration program from the current level of 39 agencies to an additional 100 agencies over a period of seven years, ending in 2022. However, as is also required by 2016 MTW Expansion Statute, HUD also intends to designate these 100 new agencies in cohorts over a period of seven years, ending in 2022. For each cohort of PHAs selected, the 2016 MTW Expansion Statute requires HUD to direct one specific policy change to be implemented by the new MTW agencies, which HUD will evaluate rigorously. These new MTW PHAs will be required to annually submit a new form titled, The Supplement to the Annual PHA Plan, and as such they will not be required to complete or submit this revised Form 50900. In 2018, revisions were made to update this Form 50900 to enable HUD to continue to respond to Congressional and other inquiries regarding promising activities and practices learned throughout the duration of the MTW demonstration to date for the original 39 MTW agencies. This 2020 proposed revision of the Form 50900 makes a variety of refinements based on the experiences of HUD and PHAs and to respond to other inquiries and requirements, including the following: <ol style="list-style-type: none">1. Simplification of information submitted annually by the PHA.2. Clarification and reimagining of the information to be reported, annually, that will lead to the ability to "tell the story" of the Moving to Work demonstration as a whole.3. Addition of language regarding unspent Operating Fund and Housing Choice Voucher funding to increase the transparency of the planned use of the funds.4. Support and increase participants' knowledge and understanding of the MTW Program by requiring the inclusion of the PHA's Hardship Policy as an appendix to the MTW Annual Plan.			
11. Affected public: (mark primary with "P" and all others that apply with "X") a. Individuals or households b. Business or other-for-profit c. Not-for-profit institutions		12. Obligation to respond: (mark primary with "P" and all others that apply with "X") a. Voluntary b. P Required to obtain or retain benefits c. Mandatory	
e. Farms f. Federal Government g. P State, Local or Tribal Government			

<p>13. Annual reporting and recordkeeping hour burden:</p> <p>a. Number of respondents 89</p> <p>b. Total annual responses 518</p> <p> Percentage of these responses collected electronically 100%</p> <p>c. Total annual hours requested 5680</p> <p>d. Current OMB inventory 5680</p> <p>e. Difference (+, -) 0</p> <p>f. Explanation of difference:</p> <p> 1. Program change:</p> <p> 2. Adjustment: 0</p>	<p>14. Annual reporting and recordkeeping cost burden: (in thousands of dollars)</p> <p>Do not include costs based on the hours in item 13.</p> <p>a. Total annualized capital/startup costs \$0.00</p> <p>b. Total annual costs (O&M) \$0.00</p> <p>c. Total annualized cost requested \$0.00</p> <p>d. Current OMB inventory \$0.00</p> <p>e. Difference \$0.00</p> <p>f. Explanation of difference:</p> <p> 1. Program change:</p> <p> 2. Adjustment:</p>
<p>15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X")</p> <p>a. <input checked="" type="checkbox"/> Application for benefits e. <input checked="" type="checkbox"/> Program planning or management</p> <p>b. <input checked="" type="checkbox"/> Program evaluation f. Research</p> <p>c. General purpose statistics g. <input checked="" type="checkbox"/> Regulatory or compliance</p> <p>d. Audit</p>	<p>16. Frequency of recordkeeping or reporting: (check all that apply)</p> <p>a. <input type="checkbox"/> Recordkeeping b. <input type="checkbox"/> Third party disclosure</p> <p>c. <input checked="" type="checkbox"/> Reporting:</p> <p> 1. <input type="checkbox"/> On occasion 2. <input type="checkbox"/> Weekly 3. <input type="checkbox"/> Monthly</p> <p> 4. <input type="checkbox"/> Quarterly 5. <input type="checkbox"/> Semi-annually 6. <input checked="" type="checkbox"/> Annually</p> <p> 7. <input type="checkbox"/> Biannually 8. <input type="checkbox"/> Other (describe)</p>
<p>17. Statistical methods:</p> <p>Does this information collection employ statistical methods?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>18. Agency contact: (person who can best answer questions regarding the content of this submission)</p> <p>Name: Jennifer Rainwater</p> <p>Phone: (303) 672-5111</p>

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.

Marianne Nazzaro, MTW Director

Signature of Program Official: 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 following information collections are required to administer the MTW demonstration program.

All public housing agencies (PHAs) are required to submit the 5-Year and Annual Plan as stated in Section 5A of the 1937 Act, as amended; however, for PHAs with specific types of Moving to Work (MTW) demonstration agreements the Annual MTW Plan and Annual MTW Report are submitted in lieu of the standard plan documents. This updated Form 50900 only applies to the 39 existing MTW PHAs as of December 2015.

The MTW demonstration was authorized under Section 204 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996 (Public Law 104-134, 110 Stat 1321), dated April 26, 1996. The original MTW demonstration statute permitted up to 30 PHAs to participate in the demonstration program. Nineteen PHAs were selected for participation in the MTW demonstration in response to a HUD Notice published in the Federal Register on December 18, 1996, and five of the 30 slots were filled through the Jobs-Plus Community Response Initiative.

Additional MTW ‘slots’ have been added by Congress over time through appropriations statutes. Two PHAs were specifically named and authorized to join the demonstration in 1999 under the VA, HUD, and Independent Agencies Appropriations Act of 1999 (Pub Law 105-276, 112 Stat. 2461), dated October 21, 1998. A Public and Indian Housing Notice (PIH Notice 2000-52) issued December 13, 2000, allowed up to an additional six PHAs to participate in the MTW demonstration. The Consolidated Appropriations Act, 2008 (Pub Law 110-161, 121 Stat. 1844) added four named PHAs to the MTW demonstration.

Subsequent appropriations acts for 2009, 2010, and 2011 authorized a total of 12 additional MTW slots. As part of HUD's 2009 budget appropriation (Section 236, title II, division I of the Omnibus Appropriations Act, 2009, enacted March 11, 2009), Congress directed HUD to add three PHAs to the MTW program. As part of HUD's 2010 budget appropriation (Section 232, title II, division A of the Consolidated Appropriations Act, 2010, enacted December 16, 2009), Congress authorized HUD to add three PHAs to the MTW demonstration. In 2011, Congress again authorized HUD to add three MTW PHAs pursuant to the 2010 Congressional requirements.

A Standard MTW Agreement was developed in 2007 and was transmitted to the existing MTW PHAs in January 2008. As additional MTW PHAs were selected they too were provided with the Standard MTW Agreement. All 39 existing MTW PHAs operate under this Standard MTW Agreement, which authorizes participation in the MTW demonstration through each PHA's 2028 fiscal year. HUD has thus extended the Standard MTW Agreement to 2028, as required by the Consolidated Appropriations Act, 2016.

In addition to statutory and regulatory relief,¹ MTW agencies have the flexibility to apply fungibility across three core funding programs' funding streams – public housing Operating Funds, public housing Capital Funds, and HCV assistance (to include both HAP and Administrative Fees) – hereinafter referred to as “MTW Funding.” HUD requires different information from the existing 39 MTW PHAs for program oversight purposes. The existing 39 MTW PHAs are therefore required to submit an Annual MTW Plan and an Annual MTW Report in accordance with the Standard MTW Agreement, in lieu of the regular 5-Year and Annual Plan.

Through the Annual MTW Plan and Annual MTW Report, each of the 39 existing MTW PHAs will inform HUD, its residents, and the public of the MTW PHA's mission for serving the needs of low-income and very low-income families, and the MTW PHA's strategy for addressing those needs. The Annual MTW Plan, like the regular 5-Year and Annual Plan, provides an easily identifiable source by which residents, participants in tenant-based programs, and other members of the public may locate policies, rules, and requirements concerning the MTW PHA's operations, programs and services.

Revisions are being made to this 50900 Form to improve its usability and to address issues identified by HUD and the MTW PHAs over time and as discussed in the abstract above, especially as it relates to a MTW PHA's ability to report to HUD and its' local community on the results of increasing housing choice, avenues to increase the family's self-sufficiency and the realization of cost savings in the program. The revisions in this FORM 50900, simplify and reduce the volume of information collected from the MTW PHA, without diminishing the substance of the information provided. MTW PHAs no longer need to report standard metrics for each individual activity; rather, they will report the results of all activities related to a particular statutory objective.

¹ For more information about the MTW demonstration program and the specific activities of existing MTW agencies, please refer to the MTW website at www.hud.gov/mtw.

The Appropriations Act in 2016 authorized an additional 100 MTW slots and additional slots may be added through future appropriations acts. Eligible applicants interested in obtaining MTW designation are required to submit applications to HUD, as explained in the applicable HUD notice. The information collection covers the information needed from applicants to determine which applicants should be selected. The information provided demonstrates the applicants' plans to implement a local MTW program and includes related applicant history. The application includes such information as narrative exhibits, certifications, data forms, and supporting documentation that will be used by HUD staff to evaluate threshold requirements and review applications however, new MTW PHAs will be covered under a different collection process and will submit an annual Supplement to the PHA Annual Plan, instead of Form 50900.

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.

A current listing of the existing 39 active MTW PHAs can be found on the Public and Indian Housing website at http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/ph/mtw/history. Participating MTW PHAs will annually submit an electronic version of both the Annual MTW Plan and Annual MTW Report. After submission, copies of the documents are distributed to headquarters and field staff who participate in the monitoring and evaluation of the MTW demonstration. As indicated above, the information collection is used to provide a framework for local accountability and to the extent possible, an easily identifiable source by which public housing residents, Housing Choice Voucher participants, and other members of the public may locate basic MTW PHA policies, rules and requirements concerning its operations, programs and services, as well as planned changes to policies, procedures and activities for the coming year

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).

Under the Standard MTW Agreement, the existing MTW PHAs will submit electronic copies (one to headquarters, one to the field office) of the Annual MTW Plan and Annual MTW Report to HUD annually. After receipt, MTW Plans and Reports are posted to the MTW website within the PIH HUD Website. Applications will be submitted electronically.

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 is no duplication of effort. Information collected is unique to this collection and to each MTW PHA and does not duplicate any similar information or method.

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.

This information collection has no impact on small businesses or other entities.

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 1996 Appropriations Act requires each PHA participating in MTW to keep records and submit reports to HUD that document the MTW PHA's use of program funds, provide data to assist HUD in assessing the MTW demonstration, and describe and analyze the effect of the MTW PHA's activities in addressing the objectives of the PHA's Annual MTW Plan. This information collection permits HUD to track the use of federal funds spent by MTW PHAs and to monitor this complex demonstration.

The federal statutory mandate contained in Section 204 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996 (Public Law 104-134, 110 Stat 1321), dated April 26, 1996, would not be met if the collection were not conducted. The information collection is necessary to the continuation of the MTW demonstration and so that the available funds are used to meet the stated purpose of MTW.

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. 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.

This information collection was announced in the Federal Register, Volume 85, Page 173, on September 4, 2020. The public was given until November 20, 2020 to submit comments on the proposed information collection. HUD received various comments on this proposed collection.

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

No payments or gifts are provided to respondents for any of this information collection.

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

The Annual MTW Plans and Annual MTW Reports and applications submitted to HUD are public information and do not lend themselves to confidentiality.

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 sensitive questions are being asked for in the MTW plans and reports.

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.

We estimate that costs to the respondents to complete this information collection will not exceed those incurred by regular grant administration, planning and management and may bring a cost savings to the respondents.

The chart below outlines the burden associated with the various aspects of the MTW applications, the Annual MTW Plan and the Annual MTW Reports. Each of the items listed is a category within the list of items that must be submitted for the Annual MTW Plans and Annual MTW Reports. All elements are included in the Annual MTW Plan and the Annual MTW Report. In the Annual MTW Plan, the MTW PHA outlines the approaches that they will be utilizing during the new fiscal year and include any data or information appropriate to explain their plans, then the Annual MTW Report draws directly from the Annual MTW Plan when the MTW PHA outlines actual experiences and accomplishments during the year and explains any differences between the plan submission and the reported accomplishments.

	Respondents	Annual responses per Respondent	Total responses per year	Burden per year per Respondent	Total burden hours	*Hourly Cost	Cost Burden
Program Information							
Application	50	1	50	20	1000	55.94	\$55,940.00
50900“Annual MTW Plan and Report Elements”							
Introduction	39	2 ²	78	1	78	55.94	\$4,363.32
General Housing Authority Information	39	2*	78	8	624	55.94	\$34,906.56
Proposed MTW Activities	39	1 ³	39	37	1443	55.94	\$80,721.42
Ongoing MTW Activities	39	2*	78	15	1170	55.94	\$65,449.80
Sources and Uses of Funding	39	2*	78	8	624	55.94	\$34,906.56
Administrative	39	2*	78	7 ⁴	546	55.94	\$30,543.24
Certifications of Compliance	39	1 ⁵	39	5	195	55.94	\$10,908.30
Total Burden	89	varies	518		5,680		\$317,739.20

*This hourly rate is based on at the average wage of a GS-13 - \$55.94 per hour (step 5)

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 is no cost burden to respondents aside from the time burden referenced in 12 above.

14. Estimate annualized costs to the Federal government.

We do not estimate that there will be any additional costs to the federal government for any of this information collection, although the Total Burden has increased particularly due to the increases in the average wage of staff, in this proposed Form revision. Staff assigned to review the Annual MTW Plan and Annual MTW Report would have previously been reviewing the regular 5-Year and Annual Plan for each of these PHAs. The average grade for the staff working on MTW is GS-13, and they spend approximately 10 hours reviewing and exchanging information with the MTW PHAs for each Annual MTW Plan and Annual MTW Report and 2 hours reviewing each MTW Application. This translates to 10 hours for 39 reports and 39 plans (780 hours) and 2 hours for 50 applications (100 hours) at the average wage of a GS-13 - \$55.94 per hour (step 5). Total cost = \$49,227.20.

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

² Submits 2 responses each year: once in Annual MTW Plan, once in Annual MTW Report

³ Submits 1 response each year: once in Annual MTW Plan

⁴ MTW PHAs do not have to submit HUD form 50077, Plan certification, and elements of this form have been included in this collection process and the total number of burden hours has been adjusted accordingly.

⁵ Submits one response each year: in Annual MTW Report

This is a revision of a previously approved collection. This revision of the Form also makes a variety of refinements to improve clarity and usability, based on the experiences of HUD and MTW PHAs with the Form over the last three years. Examples of these refinements include: Clarification of the definition of self-sufficiency and the PHA hardship policy, additional usage of data already reported into HUD on-line systems, and reimagining and clarification of the metrics reported across all current MTW PHAs leading to telling the MTW demonstration story.

As stated above, all PHAs are required to submit regular 5-Year and Annual Plans as required by Section 5A of the 1937 Act, as amended, however, existing MTW PHAs submit the Annual MTW Plan and Annual MTW Report in lieu of these planning documents. OMB approval for an alternate submission was sought and approved and the current Form 50900 expires on January 31, 2021. Through the revised Form, respondents will report both numerical and qualitative outcome information to accurately evaluate the comprehensive effects of MTW policy changes on residents, the MTW PHA's operations, and the local community.

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

Information collection results are not tabulated and published in the traditional sense, however, plans and reports are converted to Adobe Acrobat files and posted to the MTW website on an ongoing basis, as they are submitted and approved or accepted, as applicable, by HUD.

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.

Not applicable. HUD will display the OMB control number and expiration date on the form.

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

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

There are no collections of information that employ statistical methods.