

**Supporting Statement for Paperwork Reduction Act Submissions**  
**Rental Assistance Demonstration (RAD): Supporting Contracts and Processing**  
**Requirements**  
**OMB Control Number 2502-0612**

52611, 52614, 52617, 52619, 52620A, 52620B, 52621A, 52621B, 52624, 52625, 5679, 5977, 5978. **NEW FORMS:** 5886, 5887, 5888, 5889, 5890, 5891, 5892, 5893, 5894, 5895, 5896, 5897, 5898, 5899, 5900, 5901, 5902, 5903, 5904

**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. Include a statement regarding the changes for this submission.**

The purpose of this submission is to update the ICR for 2502-0612 Rental Assistance Demonstration (RAD); Supporting Contracts and Processing Requirements for these documents.

RAD is authorized by the Consolidated and Further Continuing Appropriations Act of 2012 ([Pub. L. No. 112-55](#), approved November 18, 2011), as amended by the Consolidated Appropriations Act, 2014 (Pub. L. No. 113-76, approved January 17, 2014), the Consolidated and Further Continuing Appropriations Act, 2015 (Pub. L. No. 113-235, approved December 16, 2014), the Consolidated Appropriations Act, 2016 (Pub. L. No. 114-113, approved December 18, 2015), the Consolidated Appropriations Act, 2017 (Pub. L. No 115-31, approved May 5, 2017), and section 237 of Title II, Division L, Transportation, Housing and Urban Development, and Related Agencies, of the Consolidated Appropriations Act, 2018 (Pub. L. 115-141, approved March 23, 2018), and further amendments from time to time. RAD allows properties assisted through Public Housing, Moderate Rehabilitation (Mod Rehab), Rent Supplement (Rent Supp), Rental Assistance Payment (RAP), and Section 202 Project Rental Assistance Contract (PRAC) to convert to long-term project-based Section 8 rental assistance contracts. Participation in the initiative is voluntary. There are two components to the RAD Demonstration, influencing the collection requirements. Under the first component, PHAs may convert public housing projects to assistance under either a Project Based Voucher (PBV) or Project Based Rental Assistance (PBRA) HAP contract, limited to 455,000 units. Under the second component, owners of Mod Rehab, including Single Room Occupancy, as well as owners of Rent Supplement, Rental Assistance Payment, and Project Rental Assistance Contract (PRAC) projects, may, at contract expiration or termination, convert to a long-term section 8 contract. Requirements under both the First and Second component of RAD are established in PIH 2012-32 /H 2017-03 Rev 3 (or successor Notice) and H/PIH 2016-17 (collectively, the “RAD Notices”). Unique contractual and processing requirements are associated with each component and for each pre-conversion program type.

This collection includes the following information a PHA or owner may need to collect, maintain, or submit to ensure RAD programmatic and statutorily compliance with the

following:

- Conversion Eligibility requirements as described in the RAD Notice
- Resident Rights and protections
- CHAP amendments
- Information needed to determine the long-term viability of RAD converting properties and compliance with program requirements
- Information the Department may require in order to exercise discretionary judgment authorized under the RAD Notices:
- Demonstration of transaction closing preparedness, including, as applicable:
- Documentation required for HUD approval for any refinancing or restructuring of secured debt.
- Maintenance of other information that may be requested following the conversion, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work.

**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.**

The information collection contained herein supports two activities: first, it includes the related contract documents that awardees will sign as part of the conversion process that memorialize agreements between HUD and parties to ensure the application of legal requirements and, second, it includes the associated program submission requirements for awardees prior to or following conversion for HUD to ensure compliance with program requirements. The following documents will be submitted by Public Housing Authorities (PHAs) and Owners to The Department for evaluation.

### **Documentation under the First Component (Public Housing Conversions)**

#### **1. (NEW FORM) RAD Application Form**

- How the information is used: This information will be collected via an online portal to determine eligibility
- Who will collect and use the information: HUD
- The purpose of the Information: The application is used to determine program eligibility and provide information to make an initial award.

#### **2. (Form 52624) RAD Conversion Commitment (Public Housing; First Component)**

- How the information is used: This information will be used as the commitment of conversion for the Public Housing property undergoing the RAD conversion.
- Who will collect and use the information: HUD.
- The purpose of the Information: This document acts as official HUD approval of a PHA and Owner financing plan and details the terms and conditions of the conversion agreement between HUD and the PHA.

#### **3. (Forms 52621A and 52621B) RAD First Component HAP Contract for the Conversion of Public Housing to Section 8 Project-Based Vouchers (PBV) Part I and**

## **Part II**

- How the information is used: This information is used to enter a contract for housing assistance payments.
  - Who will collect and use the information: HUD and PHAs.
  - The Purpose of the Information: PHAs will use this contract (Part I and Part II) at the completion of a RAD conversion of Public Housing to PBV. The contract dictates the terms under which housing assistance payments will be made.
- 4. (Forms 52620A and HUD 52620B) RAD First Component HAP Contract RAD for the Conversion of Public Housing to Project-Based Section 8 (PBRA) Part I and Part II**
- How the information is used: This information is used to enter a contract for housing assistance payments.
  - Who will collect and use the information: HUD.
  - The Purpose of the Information: HUD will use this contract at the completion of a RAD conversion of Public Housing to Project-Based Section 8 (PBRA) The contract dictates the terms under which housing assistance payments will be made.
  - *Note: this had previously been referred to under the form numbers HUD 52620 and HUD 52618*
- 5. (Form 52625) RAD First Component Use Agreement**
- How the information is used: This information will be used as the binding agreement between the owner and HUD for the Public Housing projects undergoing the RAD conversion.
  - Who will collect and use the information: HUD.
  - The purpose of the Information: This document sets out affordability and use restrictions for converted projects.
- 6. (NEW FORM) RAD/Section 18 Blend Rider to RAD Use Agreement**
- How the information is used: This information will be used as the binding agreement between the owner and HUD for certain Public Housing projects preserved in conjunction with the RAD conversion.
  - Who will collect and use the information: HUD.
  - The purpose of the Information: This document sets out affordability and use restrictions for projects approved through Section 18 in conjunction with RAD and that will be preserved with project-based assistance.
- 7. (NEW FORMS) PHA Counsel and Project Owner Opinions**
- How the information is used: This information is used by HUD to determine that the claims made by PHA or Owner can be relied on.
  - Who will collect and use the information: HUD.
  - The purpose of the Information: These documents provide evidence to HUD that claims made are reliable.
- 8. (NEW FORM) RAD Transfer of Assistance Restrictive Covenants**

- How the information is used: This information will be used as the binding agreement between the owner and HUD for certain properties release from the Public Housing Declaration of Trust following a transfer of assistance.
- Who will collect and use the information: HUD.
- The purpose of the Information: This document sets out affordability and use restrictions for properties released from the public housing Declaration of Trust to ensure the land or proceeds generated from the land are used for affordable housing.

**1. (NEW FORM) Contract Administrator and Owner Funding Survey**

- How the information is used: This information will be used in order to determine whether the new voucher funding provided to a PHA is appropriate and how the owner is depositing into and withdrawing from the capital replacement reserve
- Who will collect and use the information: HUD.

The purpose of the information: This information is necessary to ensure PHAs have the appropriate resources needed to meet funding commitments under new HAP contracts and that projects have the necessary resources to meet ongoing capital needs

**Documentation Submitted Under the Second Component (Multifamily Housing Conversions)**

**1. (NEW FORM) Submission of Interest (Mod Rehab and PRAC)**

- How the information is used: This information is used to acknowledge interest from an owner of a property supported by a Mod Rehab, Rent Supp, RAP, or PRAC contract
- Who will collect and use the information: HUD
- The purpose of the information: This information is necessary in order to direct the owner to appropriate technical assistance as the initiate the conversion process.

**2. (Form 52611) RAD Rider to the Section 8 Project-based Voucher (PBV) Housing Assistance Payments (HAP) Contract for Existing Housing (Rent Supplement, Rental Assistance Payment and Section 8 Moderate Rehabilitation Program Conversions; Second Component)**

- How the information is used: This information is used to enter a contract for housing assistance payments for the conversion of Mod Rehab, Rent Supp, or RAP to PBV.
- Who will collect and use the information: HUD
- The purpose of the information: This Rider is to be executed between the Public Housing Agency (PHA) and the owner of an eligible project in connection with HUD approval of the use of tenant-protection vouchers issued under section 8(o) of the United States Housing Act of 1937 (1937 Act), for PBV assistance under RAD. This Rider is used when the project qualifies as PBV “existing housing” under 24 C.F.R. § 983.3 and must be attached to PBV HAP Contract for Existing Housing (HUD 52621A).

**3. (Form 52619) RAD Second Component Part I Housing Assistance Payments (HAP) Contract RAD for the Conversion of Moderate Rehabilitation to Project-Based**

## **Section 8 (PBRA)**

- How the information is used: This information is used to enter a contract for housing assistance payments for the conversion of Mod Rehab to PBRA.
  - Who will collect and use the information: HUD
  - The purpose of the information: HUD will use this contract (Part I) at the completion of a RAD conversion of Mod Rehab to Project-Based Section 8 (PBRA) The contract dictates the terms under which housing assistance payments will be made.
4. **(Form 52617) RAD Second Component Part II Housing Assistance Payments (HAP) Contract RAD for the Conversion of Moderate Rehabilitation to Project Based Section 8 (PBRA)**
- How the information is used: This information is used to enter a contract for housing assistance payments for the conversion of Mod Rehab to PBRA.
  - Who will collect and use the information: HUD
  - The purpose of the information: HUD will use this contract (Part II) at the completion of a RAD conversion of Mod Rehab to Project-Based Section 8 (PBRA) The contract dictates the terms under which housing assistance payments will be made.
5. **(Form 5977) RAD Second Component Rent Supplement Program (RAP) Project-Based Section 8 (PBRA) Housing Assistance Payments (HAP) Contract Part I**
- How the information is used: This information is used to enter a contract for housing assistance payments for the conversion of Rent Supp or RAP to PBRA.
  - Who will collect and use the information: HUD
  - The purpose of the information: HUD will use this contract (Part I) at the completion of a RAD conversion of Rent Supp or RAP to Project-Based Section 8 (PBRA). The contract dictates the terms under which housing assistance payments will be made.
6. **(Form 5978) RAD Second Component Rent Supplement Program (RAP) Project-Based Section 8 (PBRA) Housing Assistance Payments (HAP) Contract Part II**
- How the information is used: This information is used to enter a contract for housing assistance payments for the conversion of Rent Supp or RAP to PBRA.
  - Who will collect and use the information: HUD
  - The Purpose of the Information: HUD will use this contract (Part II) at the completion of a RAD conversion of Rent Supp or RAP to Project-Based Section 8 (PBRA) The contract dictates the terms under which housing assistance payments will be made.
7. **(NEW FORMS) RAD Second Component Project Rental Assistance Contract (PRAC) Project-Based Section 8 (PBRA) Housing Assistance Payments (HAP) Contract Part I and Part II**
- How the information is used: This information is used to enter a contract for housing assistance payments for the conversion of PRAC to PBRA.
  - Who will collect and use the information: HUD
  - The purpose of the information: HUD will use this contract at the completion of a RAD conversion of PRAC to Project-Based Section 8 (PBRA). The contract dictates the terms

under which housing assistance payments will be made.

**8. (NEW FORMS) RAD Section 8 Project-based Voucher (PBV) Housing Assistance Payments (HAP) Contract for Existing Housing (PRAC Second Component) Part I and Part II**

- How the information is used: This information is used to enter a contract for housing assistance payments for the conversion of PRAC to PBV.
- Who will collect and use the information: HUD
- The purpose of the information: HUD will use this contract at the completion of a RAD conversion of PRAC to PBV, the contract dictates the terms under which housing assistance payments will be made.

**9. (NEW FORM) PRAC Conversion Agreement**

- How the information is used: This information will be used as the commitment of conversion for the PRAC property undergoing the RAD conversion.
- Who will collect and use the information: HUD.
- The purpose of the Information: This document acts as official HUD approval of an Owner's Conversion Plan and details the terms and conditions of the conversion agreement between HUD and the Owner.

**10. (NEW FORM) Elderly Housing Use Agreement**

- How the information is used: This information will be used as the binding agreement between the owner and HUD for the Public Housing projects undergoing the RAD conversion.
- Who will collect and use the information: HUD.
- The purpose of the Information: This document sets out affordability and use restrictions for converted projects. HUD will use this document in support of the RAD conversion and the official documentation therein.

**11. (NEW FORM) Mod Rehab Owner Information**

- How the information is used: This information will be used to correspond with owners of Mod Rehab properties about RAD conversions
- Who will collect and use the information: HUD.
- The purpose of the Information: This document sets out affordability and use restrictions for converted projects. HUD will use this document in support of the RAD conversion and the official documentation therein.

**12. (NEW FORM) Counsel Opinion (PRAC)**

- How the information is used: This information is used by HUD to determine that the claims made by PHA or Owner can be relied on.
- Who will collect and use the information: HUD.
- The purpose of the Information: These documents provide evidence to HUD that claims made are reliable.

## **Documentation Submitted under the First and Second Component**

### **1. (Form 52614) RAD Financing Plan and Conversion Plans**

- How the information is used: This information described in Attachment 1A, 2A, and 4A of the RAD Notice and submitted electronically will be used to assess compliance with RAD requirements.
- Who will collect and use the information: HUD.
- The purpose of the information: The PHA or owner's financing plan or conversion plan demonstrates the availability of resources adequate to address all current and ongoing capital needs of a project identified in a Capital Needs Assessment and to ensure compliance with all program requirements. The plan is evaluated to ensure the long-term physical and financial viability of the Covered Project.

### **2. (HUD 5679) Addendum to the HAP Contract – Labor Standards**

- How the information is used: This information will be used as an additional rider to the existing PBV and PBRA HAP contracts.
- Who will collect and use the information: HUD.
- The purpose of the information: This document is used for both the Project-Based Voucher (PBV) HAP Contract and the Project-Based Rental Assistance (PBRA) HAP Contract under RAD for conversions under either the first component (public housing) or second component (Mod Rehab, Rent Supp, RAP, and PRAC) and applies certain labor standard requirements for all construction or repair work on projects that are initiated within eighteen (18) months after the effective date of the HAP contract.

### **3. (NEW FORM) Post-Closing Completion Certification**

- How the information is used: This information will be used in order to assess whether the work required as part of the RAD conversion and other commitments have been completed
- Who will collect and use the information: HUD.
- The purpose of the information: This information is necessary in order to monitor compliance with requirements agreed to as part of the conversion, including the completion of any rehabilitation or construction.

**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.**

To minimize the public reporting burden, HUD has set up a web portal in order to allow for the online electronic collection of documentation that would otherwise have been submitted in hard copy. All the elements of a conversion are submitted via the web portal. The web portal allows HUD to pre-load data already in its possession so that the public is only providing necessary data.

**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 reporting. The covered collection activities are not available elsewhere. Wherever possible, HUD auto-populates forms from existing data sources. Without the data requested, HUD cannot ensure that the statutory program goals are met.

**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.**

This information collection will not have a significant economic impact on small entities. Participation in RAD is voluntary and, for PHAs and owners who choose to participate, the application submission requirements were designed to minimize the cost to the applicant and only require the minimum amount of information needed in HUD's evaluation, including by relying on HUD-held data and on reducing requirements for very small PHAs and owners.

**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.**

Public Housing Authorities and project owners interested in participating in the Demonstration and who have had their applications approved are required to submit information so that HUD can ensure that the goals of RAD, as well as compliance with all related laws, are met. Failure to collect this information in the timeframes indicated would impede the Department's ability to determine continued eligibility for participation in RAD and would impair HUD's ability to enter binding contractual relations to effectuate the successful conversion of units under the Demonstration.

**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;**

None

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

None

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

None



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

None

**\* 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;**

None

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

None

**\* 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**

None

**\* 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.**

None

**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. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

In accordance with 5CFR 1320.8(d), this information collection soliciting public comments was announced in the Federal Register on May 18, 2020, Volume 85, No. 96, Pages 29739. Comments received, **Yes**.

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

No payment or gift will be granted to the respondents.

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

Assurance of confidentiality is neither provided nor needed for this information collection.

**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.**

No sensitive information is being asked by this collection.

**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 number of respondents for the forms listed below and reflected in the chart below indicates the number of potential respondents. Individual forms must be submitted for each

project that the applicant is seeking to convert under RAD.

	Number of Resp.	Frequency of Response	Resp. Per Year	Avg. Burden Hours Per Resp.	Annual Burden Hours	Hourly Cost per Response	Total Annual Cost
<b>I. Documentation under the First Component (Public Housing Conversions)</b>							
1. (NEW FORM) RAD Application Form	300	1	300	0.5	150	\$58	\$8,700
2. (Form 52624) RAD Conversion Commitment (Public Housing; First Component)	300	1	300	1	300	\$58	\$17,400
3. (Forms 52621A and 52621B) RAD First Component Part I HAP Contract for the Conversion of Public Housing to Section 8 Project-Based Vouchers (PBV) Part I and Part II	150	1	150	0.5	75	\$58	\$4,350
4. (Forms 52620A & 52620B) RAD First Component Parts I & II HAP Contract RAD for the Conversion of Public Housing to Project-Based Section 8 (PBRA)	150	1	150	0.5	75	\$58	\$4,350
5. (Form 52625) RAD First Component Use Agreement	300	1	300	0.5	150	\$58	\$8,700
6. (NEW FORM) RAD/Section 18 Blend Rider to RAD Use Agreement	150	1	150	0.25	37.5	\$58	\$2,175
7. (NEW FORM) PHA Counsel and Project Owner Counsel Opinions	300	1	300	0.25	75	\$58	\$4,350
8. (NEW FORM) RAD Transfer of Assistance Covenants	20	1	20	0.5	10	\$58	\$580
9. (NEW FORM)	150	1	150	0.5	75	\$58	\$4,350

Contract Administrator and Owner Funding Survey							
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**II. Documentation under the Second Component (Multifamily)**

1. (NEW FORM) Submission of Interest (Mod Rehab and PRAC)	70	1	70	1	70	\$58	\$4,060
2. (Form 52611) RAD Rider to the Section 8 Project-based Voucher (PBV) Housing Assistance Payments (HAP) Contract for Existing Housing (Rent Supplement, Rental Assistance Payment and Section 8 Moderate Rehabilitation Program Conversions; Second Component)	10	1	10	0.5	5	\$58	\$290
3. (Forms 52619 & 52617) RAD Second Component Parts I & II Housing Assistance Payments (HAP) Contract RAD for the Conversion of Moderate Rehabilitation to Project-Based Section 8 (PBRA)	10	1	10	0.5	5	\$58	\$290
4. (Forms 5977 & 5978) RAD Second Component Rent Supplement Program (RAP) Project-Based Section 8 (PBRA) Housing Assistance Payments (HAP) Contract Parts I & II	3	1	3	0.5	1.5	\$58	\$87
5. (NEW FORM) RAD Second Component Project Rental Assistance Contract (PRAC) Project-Based	45	1	45	0.5	22.5	\$58	\$1,305

Section 8 (PBRA) Housing Assistance Payments (HAP) Contract Part I and Part II							
6. (NEW FORM) RAD Section 8 Project-based Voucher (PBV) Housing Assistance Payments (HAP) Contract for Existing Housing (PRAC; Second Component) Part I and Part II	5	1	5	0.5	2.5	\$58	\$145
7. (NEW FORM) PRAC Conversion Agreement	50	1	50	1	50	\$58	\$2,900
8. (NEW FORM) Elderly Housing Use Agreement	50	1	50	0.5	25	\$58	\$1,450
9. (NEW FORM) Mod Rehab Owner Information	100	1	100	0.5	50	\$58	\$2,900
10. (NEW FORM) Counsel Opinion (PRAC)	50	1	50	0.25	12.5	\$58	\$725
<b>III. Documentation Submitted under the First and Second Component</b>							
1. (Form 52614) RAD Financing Plan and Conversion Plans	370	1	370	3	1110	\$49	\$54,390
2. (Form 5679) Addendum to the HAP Contract – Labor Standards	370	1	370	0.1	37	\$58	\$2,146
3. (NEW FORM) Post-Closing Completion Certification	370	1	370	2	740	\$58	\$42,920
<b>TOTALS</b>	<b>370</b>		<b>2903</b>		<b>3079</b>		<b>\$168,563</b>

**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).**

There is no start-up or additional costs to the respondents other than those reported in Item 12

above in the Burden Cost Column. The GS-14-1 wage was used for this collection, at \$58 per hour.

**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.**

Provided below is an analysis of the costs for review and approval of documents within this collection for purposes of transparency in the internal costs borne onto HUD. The cost was estimated based on the number of expected annual responses as described in Item 12. The government cost of the collection is exclusively borne by the staff time needed to review and act on (i.e. approve, reject, solicit additional information) each submission. Most of the documents listed require a low-level of staff effort, but at a GS-14 level, while the most time intensive review (the Financing Plan) is performed by staff at a GS-13 level.

**Summary HUD Staff Review of RAD Document Collection:**

HUD Staff	Total Hours Per Submission	Hourly Rate	Total
GS 14/1 Staff Person	12	\$58	** Expression is faulty **
GS 13/1 Staff Person (Financing Plan Review)	3	\$49	** Expression is faulty **
Total Staff time Per Application	15		0
Estimated Avg of Total Annual Number of Responses			318
Total Annual Staff Time Cost to Gov't			\$268,074

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

**Reinstatement, with change, of previously approved collection for which approval has expired.** Several changes have been made under both components of RAD. The changes under the First Component of RAD are as follows: the inclusion of the RAD Application

under this ICR (formerly under OMB Approval Number 2577-0278), the reorganization and streamlining of RAD Fair Housing, Civil Rights, and Relocation Submission Requirements, an update of all forms to reflect programmatic changes and improvements over the past three years, the replacement of a rider to an existing PBV HAP contract with a single contract form that incorporates all requirements into a single form, the creation of a survey of new contract voucher administrators to ensure that the amount of funding provided for converted properties is adequate, and the creation of a Post-Closing Completion Certification form for owners to document compliance with certain requirements. In addition, under the Second Component of RAD, the changes are as follows: the creation of the Submission of Interest questionnaire for owners to complete in order to connect with HUD for technical assistance, the creation of HAP contracts for the conversion of Project Rental Assistance Contract (PRAC) to PBRA and PBV as well as the new Elderly Housing Use Agreement to be recorded on PRAC properties that have converted through RAD, an update of all forms to reflect programmatic changes and improvements over the past three years, and the implementation of the Mod Rehab data, a collection of owner information requested in order to improve correspondence with owners of properties with Mod Rehab contracts. Both Components of RAD will now have the incorporation of a Conversion Plan under the Second Component, modeled after the Financing Plan used in the First Component. Both components will also now include a collection of a post-closing completion certification to monitor compliance with requirements agreed to, as part of the conversion, and ensuring that any and all record-keeping that PHAs and owners must undertake to comply with requirements under the RAD Notice is acknowledged under this ICR.

**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.**

Information collection results will not 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.**

The OMB approval number and date will appear on the HUD-prescribed forms.

**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.

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

There are no collections of information that employ statistical methods.