
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.

Signature of Program Official: X Kevin J. Gallagher, Director Office of Public and Indian Housing, Public Housing Financial Management Division	Date:
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Signature of Senior Officer or Designee: X Collette 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. This is an extension of a currently approved information collection, the Allocation of Operating Fund Grants under the Operating Fund Formula: Data Collection. The two forms listed in this collection are electronic templates that Public Housing Agencies (PHAs) will send to HUD. PHAs submit forms HUD-52723, Operating Fund Grant: Calculation of Total Program Expenses and HUD-52722, Operating Fund Grant: Calculation of Utilities Expense Level through an electronic template.

Section 9 (42 USC 1437g) of the United States Housing Act of 1937 (the Act) established the operating fund for purposes of making assistance available to PHAs for the operation and management of public housing (see **Exhibit A**). The Operating Fund Program then provides operating funds of roughly \$4.5 billion annually to approximately 3,000 PHAs to fund their operating and maintenance expenses associated with 1 million public housing units. The 1937 Act limits eligibility for public housing to low-income families and caps the public housing rents at 30 percent of a family’s income. Accordingly, PHAs rely on the HUD operating funds, as well as rental income, to cover a significant amount of the costs associated with operating their public housing units.

The funding formula in the Operating Fund Program rule, 24 CFR part 990 (See **Exhibit B**), provides for funding directly to each of the approximately 7,000 asset management properties (or projects) and in accordance with the rule HUD allocates the funding directly to the approximately 7,000 asset management properties (or projects).

2. HUD is requesting Paperwork Reduction Act approval to collect from each PHA, by project, information to calculate and fund the PHA’s share of the operating fund appropriation amount. The table below describes the two forms covered by this collection:

Allocation of Operating Fund Grants under the Operating Fund Formula: Data Collection			
OMB Control Number: 2577-0029			
No	Form No.	Form Name	Form Description
1	HUD-52722	Operating Fund Grant: Calculation of Utilities Expense Level	This form captures the utilities consumption levels by type of utility. The current utility rate is applied to the average consumption amounts over a four-year period to determine the PHA’s/project’s utilities expense level.
2	HUD-52723	Operating Fund Grant: Calculation of Total Program Expenses	This form determines a PHA’s/project’s eligibility for operating funds, based on its non-utilities and utilities expense levels and rental income, and it is the document by which HUD obligates operating funds to PHAs.

3. HUD collects information for HUD-52723 and HUD-52722 through VBA enhanced Microsoft Excel Tools. In fiscal year 2021, HUD plans to transition to web-based forms HUD-52723 and HUD-52722. HUD planned a phased launch of the web-based collection. Initially the collection by web-based forms is limited to subset PHAs that HUD expands each subsequent year until all PHAs exclusively use the web-based forms. PHAs without access to the web-based forms continue to use the Excel based forms. Web-based forms improves the availability of the forms to PHAs, improves data integrity, and secure transfer of the data from the PHA to HUD. Web-based forms should not increase the burden to complete.

4. Currently, HUD's Public Housing Information Center (PIC) system, and specifically the Building and Unit module, captures some of the data elements used in the operating fund formula calculation for each project (e.g., number of PHA units). And, the templates on the required HUD forms are pre-populated with this information. However, the majority of elements that comprise the operating fund formula are not captured elsewhere; therefore, the submission of data contained in these forms is not duplicated elsewhere.
5. The information being collected has no significant impact on small businesses or other small entities.
6. PHAs use the operating fund forms annually to request operating funds and these funds are obligated to PHAs annually. Without the information provided in these forms, HUD would not be able to distribute the operating fund appropriations it receives each fiscal year.
7. There are no special circumstances that require the collection to be conducted in a manner that is inconsistent with the guidelines in 5 CFR 1320.6.
 - 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 95; Page 29473, dated May 15, 2020. The public was given July 14, 2020 to submit comments on the proposed information collection. HUD also reached out to industry groups via the Operating Fund Web Portal. No comments were received.
9. No payments or gifts to respondents are provided.
10. No assurance of confidentiality is needed nor are any provided.

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. The estimated burden hours for the collection of this data reflect the PHAs' experience with inputting data into the form and the fact that PHAs maintain some of this information as part of their operations. HUD estimates that the annual information collection requirements for this collection for two forms (forms HUD-52722 and HUD-52723) averages .75 hours per form (45 minutes per form) for each of the approximately 7,000 affected projects, for a total of 10,500 burden hours. The estimated response time includes the time for preparation of the forms and any recordkeeping burden.

Total Estimated Annual Burden Hours					
HUD Form Number	Number of Respondents	Frequency of Response	Total Number of Responses by Respondents	Estimated Hours	Total Annual Burden Hours
HUD-52722	7,000	1	7,000	.75	5,250
HUD-52723	7,000	1	7,000	.75	5,250
Totals			14,000	.75	10,500

The estimated annualized cost to respondents is based on the 2020 general pay schedule for a GS-11, Step 1, rate for Washington-Baltimore-Arlington, DC-MD-WV-PA (an average salary for a financial analyst) that is \$34.51 per hour.

Total Estimated Annual Costs to Respondents						
HUD Form Number	Number of Respondents	Total Burden Hours	X	Hourly Rate	=	Annualized Cost
HUD-52722	7,000	5,250		\$34.51		\$181,177.50
HUD-52723	7,000	5,250		\$34.51		\$181,177.50
Total		10,500				\$362,355.00

13. There will be no additional costs to the respondents.
14. The estimated annualized cost to the federal government is based on the 2020 general pay schedule for a GS-11, Step 1 rate for Washington-Baltimore-Arlington, DC-MD-WV-PA (an average salary for a financial analyst) that is \$34.51 per hour. It is estimated that it takes approximately 1 hour to review the submission package from each PHA.

Total Estimated Annual Costs to the Federal Government					
No. of Respondents	Burden Hours	X	Hr. Rate	=	Annual Cost
14,000	14,000		\$34.51		\$483,140
9	9		\$34.51		\$310.59
Total					\$483,450.59

15. The following changes occurred in this submission. The form no longer includes blocks 4. Unit Change Indicator and 5. Rate Reduction Incentive. The form includes adjustments to improve the workflow of the form. Adjustments include changes to formatting and adding Line 19 Total base utilities expense level for respondents to clearly understand where to sum the results of data collected in columns.
16. The information collection will not be published.

17. HUD is not seeking approval to not display the expiration date of the OMB approval. The OMB number and expiration date will be displayed on a “Disclosure Statement” on each template after OMB approval is received.

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

B. Collections of Information Employing Statistical Methods

There are no collections of information employing statistical methods.