

## **OMB Control Number 2577-0257**

### **1) Practical Utility:**

Practical utility? Oh yes, a successful appeal, TR, or DBA would be of immense value to a PHA. My name is Ezra Breashears; I am the Resident Board Commissioner of a small housing authority in Fayetteville, Arkansas. I can tell you that a successful appeal vastly outweighs the small amount of work to complete a simple form like 2577-0257.

And, I'm sure the same would be true for any Multifamily property owner.

I have an example of the value in appealing an issue. In reviewing past Board minutes of the Fayetteville Housing Authority, I found that in 2006, the Executive Director appealed a SEMAP score. As it turned out, a computer glitch on the HUD side mistakenly lowered the SEMAP score to from 100 to 88. The issue was resolved and the housing authority gained 12 points. 12 points is significant on a SEMAP result. An appeal to HUD made a big difference on that year's SEMAP score.

*HUD appreciates your comment regarding the appeal of a SEMAP score. However, this PRA addresses appeals for PHAS (Public Housing Assessment System) not for SEMAP (Section Eight Management Assessment Program). More information on SEMAP can be found at - [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/hcv/semap](https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/semap)*

### **2) Accuracy of proposed time burden:**

HUD's estimate of the hourly burden seems very generous. Eight hours to gather data and complete form 2577-0257 seems much too high; it might be closer to 1 hour rather than eight hours, in my opinion. Any experienced housing authority employee would be able to complete form 2577-0275 in much less time than eight hours.

*HUD appreciates your comment regarding the time needed to complete a request for a technical review and/or database adjustment. The eight hour estimate is an average and will differ for each preparer depending on the size of the property and the number and types of deficiencies being appealed. All appeal requests must provide objectively, verifiable evidence for each item that is being appealed to show that the deficiency was either not there at the time of inspection or was not the responsibility of the property. Required evidence may include obtaining affidavits from the property's contractors conducting modernization work or local authorities regarding inconsistencies between local code and HUD's inspection protocol. The preparer may also have to obtain a signed letter from a licensed professional engineer with their seal stating that the deficiency does not exist, or an inspection report from a fire sprinkler company or local code official. The preparer might also have to obtain proof that the property does not own or is not responsible for maintaining items such as sidewalks, fences, retaining walls, or mailboxes. For one item being appealed that requires such evidence, it may take an hour just to locate the correct person, explain their need, arrange for the professional to come to the property, and follow-up to ensure the documentation is received. In addition, almost all appeal requests are for multiple deficiencies.*

### **3) Enhance quality of information**

Form 2577-0257 consists of a total of 16 information entry lines/boxes per issue. Three of the 16 entries are narrative in nature, but would only require maybe two or three declarative sentences each; and a photo/video upload capability could really enhance clarity on any particular issue.

*Form 2577-0257 is an OMB form that HUD submits periodically in accordance with the Paperwork Reduction Act.*

*A property that is submitting an appeal does not have to complete a specific form, but is encouraged to use HUD form 52306 to ensure that the appeal identifies each deficiency that is being appealed and includes distinct evidence for each item being appealed. A declarative sentence from the property is not objectively verifiable evidence and would not suffice to support an appeal. Properties can submit pictures that can be verified to have been taken at the time of inspection and that clearly show the item being appealed.*

### **4) Minimize time burden:**

First, the housing authority and the Multifamily property owner need to know where to find the online form. Maybe the time to inform would be at the HUD visit or inspection.

A simple informative line on HUD's written report left at the respondent location would suffice. If a respondent wants to appeal they will know where to go.

So, it seems efficient for HUD to offer form 2577-0275 as an online option on the HUD.gov website. The online form might also offer photo/video/document upload capability.

Form 2577-0275 appears to be an elegant and well designed form which is easy to understand and easy to fill-out. The form should serve the respondent's needs for effective appeals, technical reviews, and database adjustments.

*HUD is currently designing the next generation of inspection protocols and requirements including the appeals and adjustments process. HUD expects that the National Standards for the Physical Inspection of Real Estate (NSPIRE) will streamline and modernize the appeals process and systems and will be in effect within the next few years.*