
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. HUD will require Public Housing Authorities (PHAs) to submit SF-425s for each grant provided to PHAs from the \$685 million of Supplemental Operating Funds in the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), and to submit supporting documentation for the drawdown of funds. These information collections are essential for HUD to validate that PHAs obligated their CARES Act funds for eligible uses in accordance with program requirements as outlined in Notices PIH 2020-07, PIH 2020-24, and a notice completing departmental clearance. HUD plans to provide training to PHAs and HUD Field Office staff on the form and to implement this information after April 1, 2022.

The Coronavirus Aid, Relief, and Economic Security Act (CARES Act) provided \$685 million of supplemental Operating Funds to Public Housing Authorities (PHAs) to prevent, prepare for, and respond to coronavirus. PHAs may apply Cares Act funds only on eligible expenses incurred between March 27, 2020 to December 31, 2021. The Cares Act funds are available through HUD's Line of Credit Control System (eLOCCS). and PHAs have until March 31, 2022, to drawdown Cares Act Funds without HUD approval of the voucher. After March 31, 2022, HUD will lock any remaining CARES Act funds and PHAs must submit this form to obtain HUD approval for vouchers submitted in eLOCCS. In this form, PHAs must describe the expenditure, justify that the expenditure is for an eligible use, certify the expense incurred between March 27, 2020 to December 31, 2021, and provide documentation to support the expenditure. HUD plans to implement this form for Cares Act Funding and may use this form for future Operating Fund and Public Housing Grant funds.

HUD request an emergency approval for this PRA by March 1, 2022. HUD intends to implement the form by April 1, 2022 and provide PHAs and HUD's Field Office Staff with virtual training before implementing the form.

2. HUD requests Paperwork Reduction Act approval to collect from each PHA, by grant, information to support the request for payment in eLOCCS for certain Operating Fund and Public Housing Grants. HUD will review the information to ensure the PHA uses the funds for eligible activities and meet other conditions set by the grant before approving the draw down in eLOCCS.
3. The collection of information is done using web based form. The forms will prepopulate as much data as possible to assist the PHA complete the from quickly and without errors.
4. HUD's Public Housing Information Center (PIC) system and eLOCCS provide data elements used in the form. However, PHA's description, justification, and support documentation are not captured in any HUD systems.
5. The information being collected has no significant impact on small businesses or other small entities.
6. PHAs submit the form to support the voucher in eLOCCS 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.
8. HUD published a Notice of Proposed Information Collection for Public Comments in the Federal Register to submit comments on the proposed information collection. No comments were received.
9. No payments or gifts to respondents are provided.

10. No assurance of confidentiality is needed nor are any provided.
11. No sensitive questions are being asked.
12. This will be a web based form. The estimated burden hours for the collection of this data reflects the PHAs' experience with navigating web portal (Operating Fund Web Portal) used to host the form and fact that PHAs maintain the requested information as part of their operations and policies. HUD estimates that the information collection requirements for this collection averages 0.5 hours per form (30 minutes). HUD expects that there are 600 PHAs to complete submit no more than 6,000 forms in a calendar year. Operating Fund grants and supplementing Operating Fund grants are distributed on a calendar year basis. HUD expect that 600 PHA will participate or still have unobligated supplemental grant funds in a given calendar year. HUD for each of the approximately 6,000 vouchers submitted in eLOCCS, for a total of 3,000 burden hours. The estimated response time includes the time to complete the form and any recordkeeping burden.

Total Estimated Annual Burden Hours			
Number of Respondents	Frequency of Response	Estimated Hours	Total Annual Burden Hours
600	6000	0.5	3000

The estimated annualized cost to respondents is based on the 2021 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 \$34.86 per hour.

Total Estimated Annual Costs to Respondents					
Number of Respondents	Total Burden Hours	X	Hourly Rate	=	Annualized Cost
600	3000		\$34.86		\$104,580

13. There will be no additional costs to the respondents.
14. The estimated annualized cost to the federal government is based on the 2021 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 \$34.86 per hour. It is estimated that it takes approximately 30 minutes to review the submission from each PHA.

Total Estimated Annual Costs to the Federal Government					
No. of Responses	Burden Hours	X	Hr. Rate	=	Annual Cost
6000	3000		\$34.86		\$104,580

15. This is a new collection.
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.