

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.**

Problem and Importance: Due to the ongoing pandemic, some PHAs, POAs, and families have expressed concern with allowing routine maintenance within residential units due to the public health concerns of residents. Thus, HUD is concerned that additional risks to health and safety may exist. As an additional REAC inspection tool, RVI is an innovative and critical protocol to expand the Department's capability while minimizing the risk to residents of assisted housing. The Department wishes to utilize all available tools to gain insight to the conditions of the units, and hence, ensure residents' safety. REAC has conducted nine RVIs using new RVI protocols. To expeditiously address the health and safety of residents, we are requesting an emergency clearance for the RVI.

Additionally, the post-COVID environment will pose unique challenges that could continue to hinder normal operations on-site. Several high-risk properties to be inspected are still struggling with high local rates of COVID transmission. With ongoing concerns regarding COVID-19 transmission and potential future spikes in local rates and newer variants, HUD is concerned that some tenants are uncomfortable with inspections of their units. Accordingly, there will be instances where residents, inspectors and property personnel may not feel safe with an in-person inspection. RVI is one solution to that problem. Moreover, existence of life-threatening defects inside units may not be detected without an inspection, which may lead to putting the safety and health of the residents at risk and increase the Department risk of uninhabitable housing. Thus, the Department aims to minimize risk to the residents' health and safety when other unit inspection options may be unavailable by initiating RVI as an alternative and additional venue.

[See attachment of the authorities: The Public Housing Act requirements in the Proposed Rule of the Economic Growth Regulatory Relief and Consumer Protection Act: Implementation of National Standards for the Physical Inspection of Real Estate (NSPIRE), 86 FR 2582 (Jan. 13, 2021); the Notice of Demonstration to Assess the National Standards for the Physical Inspection of Real Estate and Associated Protocols, 84 FR 43536 (August 21, 2019); 24 CFR 203.673; 24 CFR 200.855, 200.857 and 902.13.; United States Housing Act of 1937 (42 U.S.C. 1437, et seq.), and in the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12701, et seq.). Subpart G of 24 CFR Part 5; The Debt Collection Improvement Act of 1996 (31 U.S.C. 7701(c)); 24 CFR Part 902, as amended. 24 CFR 200 subpart P.]

- 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.**

Addressing the Problem: An RVI is a physical property inspection approach that can substantially reduce the risks posed by COVID-19 as HUD/REAC returns to operations. RVIs give PHAs and POAs an alternative method to virtualize the annual REAC inspection requirement due to the challenges posed by COVID. The RVI process does not change the current Public Housing inspection requirements. The RVI information collection will inform HUD of: the type of Proxy (i.e., the operator of the camera on-site) and their potential involvement in an RVI; the appropriate technology and equipment that are available, and to

certify the RVI results provided by the Proxy. Residents will be involved on a voluntary, case-by-case, and as-needed basis to serve as a Proxy for inspection of their individual unit.

Necessary Data: HUD/REAC seeks to use the collected information for scheduling and implementing RVIs based on Public Housing Authority's (PHA's), Property Owner Agent's (POA's), and their residents' RVI readiness including having access to items such as smart devices with rear and front cameras, internet access and affordable wireless plans that can accommodate an RVI. The pre-inspection information collection checklist is comprised of POA's and PHA's access to RVI technologies, internet, staff who will serve as the proxy (i.e., operator of the RVI technology and equipment on-site). The post-RVI survey of Proxies (i.e., Operators of the RVI technology on-site) is comprised of items about the performance of the RVI. RVIs allow HUD/REAC the ability to respond to the challenges posed by the unforeseen national emergencies such as the COVID-19 pandemic and substantially contribute to reduced exposure to residents, inspectors, and property personnel relative to conducting an in-onsite, physical property inspection.

Methods: The pre-RVI checklist will be conducted over the phone in a separate call between the PHA, POA, and the REAC inspector. The pre-inspection survey of residents and post-inspection survey of Proxies will be completely managed and transmitted to HUD by the PHA and POA. The PHA and POA will transmit the survey responses in MS Excel to the RVI@hud.gov email box. The de-identified survey responses will be stored in a secure SharePoint site.

The information will allow HUD to quickly identify eligible and willing participants for HUD's flexible RVIs. HUD expects to conduct RVIs predominately with maintenance staff which will not require a survey of maintenance after the COVID pandemic is over. Currently, the survey is needed to ascertain residents' preference for participating in an RVI during COVID-19 under this emergency PRA. The survey data informs a backup option to ensure HUD can consult with residents in the instance an RVI is needed and the resident needs to be involved due to special circumstances (e.g., health and safety issues due to the pandemic).

Sampling: Immediately, REAC needs to conduct additional inspections using the RVI approach to meet part of the 40 or more necessary to test and evaluate RVI protocols. The checklist will be sampled from MF and PH properties who are due for a REAC annual inspection. Subsequently, the survey of residents will be a census of HUD-assisted Head-of-Households (HoHs) where it is determined that due to the pandemic that residents will be needed to assist in the inspection to ensure the safety of all participants. The sample of proxies will be based on the sample of the units.

Survey Management and Dissemination: The results of the RVI surveys will be transmitted to HUD via email by the PHA or POA and will be uploaded to the secure RVI SharePoint site managed by REAC. This data management approach is needed because HUD does not have the authority to collect residents' email and or phone numbers. All data collection requests are de-identified. REAC will request that PHAs and POAs commit to meeting HUD's Office of the Chief Information Officer's standards of data security and privacy when completing and transmitting the surveys to prevent spillage of Personally Identifiable Information (PII).

Data Security and Privacy: All RVI checklist and survey data will be stored in HUD's secure MS 365 secure systems and the RVI SharePoint site with restricted access to select HUD staff. Logistics will be handled by select REAC staff trained and dedicated to the RVI project and operations.

Analysis: The data about the checklist and survey responses will be aggregated to compute a sample of properties to be inspected from the Multifamily and Public Housing programs using the UPCS and NSPIRE inspection RVI protocols.

Risks and Mitigations: The risks in PHAs and POAs completing the checklist and conducting the survey of residents and Proxies may result in low response rates, residents' fear of retaliation or lack of interest in inspections. HUD will address this by encouraging all POAs and PHAs to gather survey responses from residents and Proxies and send all responses in a batch email to RVI@hud.gov. To mitigate this potential risk, HUD REAC will craft an invitation letter for the PHA and POA that highlights the necessary equipment, roles, and responsibilities of the Proxy in the RVI process and its benefits to the ensuring resident health and safety during the pandemic. The invitation will have infographics that provides a simple and inviting overview of the RVI equipment, roles, and responsibilities of the Proxy. The letter will be provided to the PHA and the POA at the time of scheduling the RVI.

Limitations: The pre-inspection logistical checklist and survey of residents and Proxies are brief and may not fully capture the concerns of residents and Proxies. To address this limitation, inspectors will capture notes about their interactions with the residents and Proxies to properly route issues.

Findings: The findings of the checklist and surveys will be used to determine site readiness for an RVI and will be used to plan for the RVI and improvement of RVIs over time. All findings will be used to direct HUD to determine which site and HOHs, if needed are good candidates for an RVI and how to improve the experience of the Proxy supporting RVIs. Results from the checklist and resident survey will be used on the day of the REAC inspection.

Conclusions: HUD will be able to determine the readiness of PHAs, POAs, Proxies, and residents' willingness and ability to participate in assessing the conditions of HUD-assisted housing using the RVI protocols.

Recommendations: The findings will be used to help improve the living conditions for residents who participate in HUD's multifamily and public housing programs, during the COVID-19 pandemic. Recommendations will also be used to operationalize RVIs into the inspection programs administered by REAC.

Next Steps: The Checklist and survey findings will be compiled, de-identified (if needed), analyzed, and reported in aggregate to appropriate HUD staff only. This will allow HUD to conduct RVIs over time and identify health and safety concerns and prompt action to address them.

Keywords: Flexible, Remote Video Inspections, RVI, checklist, surveys of residents and Proxies, Public Housing, Multifamily Housing, Property Owner agents, residents, and Proxies.

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).

Because HUD does not currently have the authority to collect the email and phone numbers of residents living in HUD-assisted housing; HUD requests authority to require the PHAs and POAs manage the surveys and send the batched results back to HUD without any PII such as name, email and/or phone. PHAs and POAs can easily disseminate the questions and send the de-identified information back to HUD via email. It is estimated that by having PHAs and POAs collect and share de-identified data, HUD REAC will increase its ability to reach a higher proportion of residents and Proxies using computers and smart devices that will be used to perform RVIs.

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.

Currently, HUD REAC does not formally collect information about HUD-assisted housing RVI readiness nor residents' willingness and readiness to assist with RVIs; or the experiences of Proxies during an RVI. The American Housing Survey does not collect information about HUD-assisted residents' ability and willingness to participate in an RVI. Also, HUD does not have the authority to collect HUD-assisted residents' email or phone on the 50059 or 50058 forms to automate data collection.

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 ICR to collect RVI checklist information as well as resident and proxy survey data are part of fulfilling HUD's core mission and it is not expected to negatively impact small businesses. HUD REAC staff discussed with small groups of PHAs and POAs how to best collaborate on completing RVIs. Based on this communication, to reduce the burden on PHAs and POAs, HUD developed a voluntary process that uses standardized items that are limited to the minimum information needed to complete and learn from RVIs. Information will be provided to the PHAs and POAs over the phone and via email to decide how they will transfer the submitted responses back to HUD's RVI email box. PHAs and POAs will be reminded not to send PII to HUD.

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.

Without the information in this ICR, it will be difficult ~~or even impossible~~ to conduct physical inspections during national security events such as the COVID-19 pandemic. In addition, HUD will not be able to assess the effectiveness and required changes to equipment, human capital, and protocols to enable the Department to conduct remote inspections or gather insights about the differences between an RVI and an on-site inspection. By collaborating with PHAs and POAs to share the tools in this ICR and collect the data they will be able to streamline data collection from properties that meet the technology and human capital requirements. For the surveys, MS Excel will be used to communicate questions with ease and is a common tool that can be securely emailed by PHAs and POAs back to HUD.

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;

HUD REAC issues a 28-day notice to ensure properties are aware that an upcoming assessment of the physical conditions or their properties is forthcoming. To meet this requirement, responses are requested within less than 30 days.

- 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

HUD will first provide PHAs and POAs with the standardized checklist and survey questions that do not request Personally Identifiable Information; and, have PHAs and POAs commit to meeting HUD's Office of the Chief Information Officer's standards of data security and privacy. All data collection requests are de-identified.

- 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 is a new ICR and HUD needs OMB approval to initiate this step.**
9. **Explain any decision to provide any payment or gift to respondents, other than reenumeration of contractors or grantees.**

Because physical property inspection is part of HUD REAC's routines and mandated line of business, an incentive for respondents are not requested at this time.

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

HUD has selected an approach to avoid the collection and transfer of Personally Identifiable Information (PII) by using the inspection and unit ID as unique identifiers for the checklist and surveys.

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.**

The checklist and questionnaires do not collect financial and identifying information. The questions focus on typical topics that comprise an RVI.

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.**

#Information Collection	Number of Respondents (12.5% of Properties Inspected overall and then split in half by program type)	*Average Number of Responses per Respondent	Total Annual Responses (12.5% of Properties Inspected overall and then split in half by program type)	Burden Hours/Minutes per Response	Total Hours	Hourly Cost	Total Annual Cost
PH Pre-Inspection Checklist	406	1	406	.33 hr. (20 min)	133.98 hrs.	\$36	4823.28
PH Pre-Remote Video Inspection (RVI) Survey of Residents	406	1	406	.08 hr. (5 min.)	32.48 hrs.	\$7.5	243.6
PH Post-Remote Video Inspection (RVI) Survey of Proxys (Operators)	406	1	406	.33 hr. (20 min)	133.98 hrs.	\$22	2947.56
MF Pre-Inspection Checklist	406	1	406	.33 hr. (20 min)	133.98 hrs.	\$36	4823.28
MF Pre-Remote Video Inspection (RVI) Survey of Residents	406	1	406	.08 hr. (5 min.)	32.48 hrs.	\$7.5	243.6

MF Post-Remote Video Inspection (RVI) Survey of Proxys (Operators)	406	1	406	.33 hr. (20 min)	133.98 hrs.	\$22	2947.56
--	-----	---	-----	------------------	-------------	------	---------

Totals 406 **Total Responses:** 1,218 **Total Hours:300**

**Average Number of Responses per Respondent = Total Annual Responses / Number of Respondents*

*#Respondents will only complete the checklist, survey and disclosure for MF **or** PH properties.*

**Average Number of Responses per Respondent = Total Annual Responses / Number of Respondents*

*#Respondents will only complete the checklist, survey and disclosure for MF **or** PH properties.*

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.

HUD REAC estimates the total annual cost to MF, PH, PHA and POA respondents, their residents and staff to be \$13,282 based on 498 hours using 2020 averages from the U.S. Department of Labor and Statistics [BLS] (Please References on Page 15). The estimates are: \$36 for Community Service Managers completing the checklist and \$7.5 for residents completing their survey. Because the Proxy (i.e., Operator of the RVI technology on-site) can be manager, resident or maintenance person, the cost to them are based on an average for their salaries based BLS 2020 estimates for the nation. This average includes an average salary of \$21 for maintenance staff in the U.S.

14. Estimate annualized costs to the Federal government.

The hourly cost is based on a GS-13 step 1, mid-level staff position in the government and represents an average annual salary of \$79,468. The source for this estimate is the U.S. Office of Personnel Management, 2021. There are 6 inspectors working 20% of the time on RVIs (18,893.6 * 6) = 95,362 and one program management analyst working 60% on RVIs = 47,680. The total cost to the government is \$143,043.

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

This collection is the first time HUD is requiring that PHAs and POAs volunteering for RVIs provide information

about their readiness to collect multifamily and public housing head of household's willingness and readiness to assist

with RVIs, PHA and POA; and, the performance of RVIs with Proxies. This is also the first time HUD is developing

and testing the RVI approach with federal staff.

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

The findings from the checklist, inspection survey of residents, and inspection survey of Proxies (i.e., Operators) will not be published to the public and will be used to solely to prepare for and improve RVIs.

- 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.**

Once approved by OMB, HUD will display the OMB approval date in the MS Excel spreadsheets and on SharePoint where the information collection is stored.

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

B. Collections of Information Employing Statistical Methods