

# Paperwork Reduction Act Submission

Please read the instruction before completing this form. For additional forms or assistance in completing this form, contact your agency's Paperwork Reduction Officer. Send two copies of this form, the collection instrument to be reviewed, the Supporting Statement, and any additional documentation to: Office of Information and Regulatory Affairs, Office of Management and Budget, Docket Library, Room 10102, 725 Seventeenth St. NW, Washington, DC 20503.

<p>1. Agency/Sub agency Originating Request:  <b>U.S. Department of Housing and Urban Development</b>                  Office of Public and Indian Housing                  Office of Public Housing and Voucher Programs</p>	<p>2. OMB Control Number:                  a. 2577-NEW                  b. <input type="checkbox"/> None <span style="float: right;">B</span></p>																		
<p>3. Type of information collection: (check one)</p> <p>a. <input checked="" type="checkbox"/> New Collection</p> <p>b. <input type="checkbox"/> Revision of a currently approved collection</p> <p>c. <input type="checkbox"/> Extension of a currently approved collection</p> <p>d. <input type="checkbox"/> Reinstatement, <b>without change</b>, of previously approved collection for which approval has expired</p> <p>e. <input type="checkbox"/> Reinstatement, <b>with change</b>, of previously approved collection for which approval has expired</p> <p>f. <input type="checkbox"/> Existing collection in use without an OMB control number</p> <p>For b-f, note item A2 of Supporting Statement instructions.</p>	<p>4. Type of review requested: (check one)</p> <p>a. <input checked="" type="checkbox"/> Regular</p> <p>b. <input type="checkbox"/> Emergency - Approval requested by</p> <p>c. <input type="checkbox"/> Delegated</p> <p>5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>6. Requested expiration date:                  a. <input checked="" type="checkbox"/> Three years from approval date b. <input type="checkbox"/> Other (specify)</p>																		
<p>7. Title:  <b>Housing Choice Voucher and Project Based Voucher Reporting Requirements</b></p>																			
<p>8. Agency form number(s): (if applicable)                  Form HUD-XXXX</p>																			
<p>9. Keywords:                  Housing Choice Vouchers (HCV), rent subsidies, low-income housing, Project-Based-Vouchers (PBVs)</p>																			
<p>10. Abstract:                  Public Housing Agencies (PHAs) apply for funding to assist low-income families to lease housing. One of the programs through which PHAs provide housing assistance is the Housing Choice Voucher (HCV) Program, a tenant-based rental assistance program. This program operates by providing vouchers that cover a portion of the contract rent for a unit. Some PHAs project-base their vouchers (the rental assistance is tied to the unit, instead of the family). Project-based vouchers (PBVs) are becoming a larger percentage of PHAs overall HCV portfolios. HUD currently collects information on individual participants in the HCV program who are in PBV units and Project certificate (PBC) housing through the PIC system. In addition, HUD collects aggregate information on the total number of PBVs under contract at the PHA level but does not collect information at the project level.</p>																			
<p>11. Affected public: (mark primary with "P" and all others that apply with "X")</p> <p>a. Individuals or households      e. Farms</p> <p>b. Business or other-for-profit      f. Federal Government</p> <p>c. Not-for-profit institutions      g. <b>P</b> State, Local or Tribal Government</p>	<p>12. Obligation to respond: (mark primary with "P" and all others that apply with "X")</p> <p>a. Voluntary</p> <p>b. <b>P</b> Required to obtain or retain benefits</p> <p>c. Mandatory</p>																		
<p>13. Annual reporting and recordkeeping hour burden:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 80%;">a. Number of respondents</td> <td style="text-align: right;">668</td> </tr> <tr> <td>b. Total annual responses</td> <td style="text-align: right;">4008</td> </tr> <tr> <td>    Percentage of these responses collected electronically</td> <td style="text-align: right;">100%</td> </tr> <tr> <td>c. Total annual hours requested</td> <td style="text-align: right;">6012</td> </tr> <tr> <td>d. Current OMB inventory</td> <td style="text-align: right;">0</td> </tr> <tr> <td>e. Difference (+, -)</td> <td style="text-align: right;">0</td> </tr> <tr> <td>f. Explanation of difference:</td> <td></td> </tr> <tr> <td>    1. Program change:</td> <td style="text-align: right;">0</td> </tr> <tr> <td>    2. Adjustment:</td> <td style="text-align: right;">6012</td> </tr> </table>	a. Number of respondents	668	b. Total annual responses	4008	Percentage of these responses collected electronically	100%	c. Total annual hours requested	6012	d. Current OMB inventory	0	e. Difference (+, -)	0	f. Explanation of difference:		1. Program change:	0	2. Adjustment:	6012	<p>14. Annual reporting and recordkeeping cost burden: (in thousands of dollars)                  Do not include costs based on the hours in item 13.</p> <p>a. Total annualized capital/startup costs <span style="float: right;">\$0</span></p> <p>b. Total annual costs (O&amp;M)</p> <p>c. Total annualized cost requested</p> <p>d. Current OMB inventory</p> <p>e. Difference</p> <p>f. Explanation of difference:</p> <p>    1. Program change:</p> <p>    2. Adjustment:</p>
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<p>15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X")</p> <p>a. Application for benefits      e. <b>X</b> Program planning or management</p> <p>b. <b>X</b> Program evaluation      f. Research</p> <p>c. General purpose statistics      . <b>P</b> Regulatory or compliance</p> <p>d. Audit</p>	<p>16. Frequency of recordkeeping or reporting: (check all that apply)</p> <p>a. <input type="checkbox"/> Recordkeeping      b. <input type="checkbox"/> Third party disclosure</p> <p>c. <input checked="" type="checkbox"/> Reporting:</p> <p>    1. <input type="checkbox"/> On occasion      2. <input type="checkbox"/> Weekly      3. <input type="checkbox"/> Monthly</p> <p>    4. <input type="checkbox"/> Quarterly      5. <input type="checkbox"/> Semi-annually      6. <input type="checkbox"/> Annually</p> <p>    7. <input type="checkbox"/> Biannually      8. <input checked="" type="checkbox"/> Other (describe) <b>Once</b></p>																		
<p>17. Statistical methods:                  Does this information collection employ statistical methods?  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>18. Agency contact: (person who can best answer questions regarding the content of this submission)                  Name: <b>Nicholas Bilka</b>                  Phone: <b>202-402-5449</b></p>																		

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## 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 collect (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	Date:
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Signature of Senior Officer or Designee:  X Colette 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. **Why is this 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/authorizing the collection of information.**

In the past 3 years, the share of Project Based-Vouchers (PBVs) has grown from approximately 5 percent of the Housing Choice Voucher program to nearly 10 percent of the HCV Program. Along with this growth, repositioning vehicles like RAD and legislation like the Housing Opportunities through Modernization Act (HOTMA) have increased the complexity of administering PBVs. Repositioning has also created a new level of risk for PBVs as a growing part of the PBV portfolio consists of units which were constructed with HUD funds and are supposed to remain affordable in perpetuity. HUD's tracking and monitoring of these projects has not increased commensurately to match the program's growing size and complexity. This creates an information deficiency that could increase risk and impede HUD's ability to monitor this critical component of the HCV program.

HUD currently collects information on individual participants in the HCV program who are in PBV and Project Certificate (PBC) housing through the PIC system. This consists of a separate section that PHAs fill out in the 50058 for families that lease a PBV/PBC unit. While this does give HUD information on PBV families and the units they reside in, it does not provide HUD with any project level information.

In addition, PHAs are required to report information on Project Based Vouchers in the Voucher Management System (VMS) aggregated information at the PHA level on the total number of vouchers committed under an Agreement to Enter HAP Contract (AHAP) as well as those under a Housing Assistance Payment (HAP) Contract. PHAs must also separately report in the comment section of VMS the number of PBV units under HAP contract that are currently not leased. This provides HUD with data on PBVs at the PHA level but does not provide with information on PBVs at the project level.

This leaves a gap in HUD's information collection of PBVs between the individual tenant data and the aggregated PHA data. HUD does not systematically collect information on the project level, including the number of units at PBV projects, what exceptions apply, their rents, the terms of contract, and numerous other potential data. This creates a challenge for monitoring, tracking and analyzing PBV projects, and limits HUD's ability to respond to requests for information on the PBV program from Congress and other sources.

The inclusion of the fields mentioned below will improve the allocation of funds and allow the PHA

### **CFR 24 Part 983 | Project-Based Voucher (PBV) Program**

#### **Consolidated Appropriations Act, 2018 (P.L. 115-141)**

**Notice PIH 2012-21** | Financial Reporting Requirements for the HCV Program Submitted through the FASH-PH and VMS

(9) PHAs are required to transmit certain leasing and cost data electronically through VMS. Data is collected monthly. Reporting is time sensitive.

#### **Notice PIH 2017-21** | Implementation Guidance: HOTMA – HCV and PBV Provisions

Appendix III (5) | PHAs are required to submit leasing and cost data in the VMS on a monthly basis. PHAs report (a) the number of PBVs under an AHAP but not under a HAP, (b) the number of PBVs under a HAP and leased, (c) the number of PBVs under a HAP that are not leased and not receiving vacancy payments, (d) the number of PBVs under a HAP and not leased with vacancy payments and associated vacancy HAP expenses and (e) HAP expenses.

2. **How is the information collected and how is the information to be used?**

Information will be collected through the Voucher Management System (VMS). PHAs are required to report cost and leasing data in VMS every month. PHAs that have PBVs will report information on new PBVs, and changes to current PBVs, in VMS when they login to do their monthly reporting. A sixth data entry screen will need to be added to VMS – PBV projects.

The information will be used by HUD to track PBV projects and monitor the PBV program. It will also be used to respond to requests for information on the PBV program from Congress and other sources.

3. **Describe whether, and to what extent, the collection of information is automated (item 13b1 of OMB form 83-i). If it's not automated, explain why not. Also describe any other efforts to reduce burden.**

Data entry will not be automated. PHAs will only need to enter information when they add new PBV projects, or when information about the project changes.

4. **Is this information collected elsewhere? If so, why cannot any similar information already available be used or modified.**

This information is currently not collected elsewhere by HUD. PHAs may be recording and managing this information internally.

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 collection of information will impact all PHAs that have project-based-vouchers in their portfolio. This may include small PHAs. HUD may provide technical assistance to PHAs that require assistance understanding the new reporting fields for PBVs.

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.**

Currently, HUD does not track project-level data on the Project Based Voucher portfolio. Consequences include – continued lack of understanding of how PBVs are being implemented and how this is impacting the PHA's ability to house low-income families, continued lack of ability to appropriately monitor and manage risk within the PBV program, inability to conduct meaningful research on the PBV portfolio and develop recommendations for improvement. Additionally, having more detailed information would allow HUD to respond to requests for information from Congress and the public.

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; PHAs would be required on a one-time basis to enter data into the system for all their projects, and  
**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. **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.**

HUD published a Notice of Proposed Information Collection for public comments in the *Federal Register*, Volume 84; Number 247; Page 70986 on December 26, 2019. The public was given until February 24, 2020, to submit comments on the Proposed Information Collection. HUD received public comments on this Proposed Information Collection.

9. **Explain any payments or gifts to respondents, other than remuneration of contractors or grantees.**

No payments or gifts to respondents are provided.

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

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. **Justify any questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private**

12. **Estimate public burden: number of respondents, frequency of response, annual hour burden. Read the complete instructions on the form 83i. Explain how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices. Provide a table to describe the elements of the burden. Break out each form used.**

- if this collection uses more than one form, provide separate estimates for each form and aggregate the hour burdens in item 13 of OMB Form 83i; and
- 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.

\*This is the current number of PHAs with PBVs, this number is expected to increase as has been the trend with PBV for several years.  
 +These are over-estimates, most PHAs will not be adding new PBVs or making changes to existing PBVs each month.

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.

Information Collection	Number of Respondents	*Average Number of Responses per Respondent	Total Annual Responses	Burden Hours/Minutes per Response	Total Hours	Hourly Cost	Total Annual Cost
<b>PBV Property Information</b>	668	6	4,008	1.5	6,012	\$40.10	<b>\$241,018.20</b>

**Totals**                      **668**                      **Total Responses: 668**                      **Total Hours: 6,012**

14. The estimate annualized costs to the federal government, based on a GS-13, Step 1 rate are provided below. A GS-13 Step 1 rate is the average salary for a Management Analyst.

HUD Field Staff Review of PHA Submissions			
GS-13 Step 1 Hourly Salary	Hours per Response	Responses per Annum	Total Federal Cost
\$36.86	0.001	4,008	\$14,773.49

- 15. Explain any program changes or adjustments reported in items 13 and 14 of the OMB Form 83i.
- 16. If the information will be published, outline plans for tabulation and publication.
- 17. Explain any request to not display the expiration date.
- 18. Explain each exception to the certification statement identified in item 19.

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