

Supporting Statement for Paperwork Reduction Act Submissions
Information Collection:
HUD Correspondence Tracking System Correspondence Portal
OMB Control Number: 2501-XXXX
Form Number: **HUD-1010**

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.

The mission of the Department of Housing and Urban Development is to create strong, sustainable, inclusive communities and quality affordable housing free from discrimination. HUD's FY 2018-2022 Strategic Plan includes methods in which we can help families to access financial programs, educational opportunities, higher paying jobs. This means HUD must streamline how the Department works, delivers services, and achieves its mission.

To realize this goal, HUD must respond to correspondence requests in a timely, effective, and professional manner, thereby ensuring public trust. The Executive Secretariat supports that objective by working with HUD staff to assure that correspondence submitted to the Secretary and Deputy Secretary meets those standards.

HUD currently collects information from the public inquiring about the vast programs and assistance offered by the Department by way of regular mail delivered by USPS and other commercial mail delivery services. Creating this Public Access Link, this would expedite the collection of information regarding the broad range of housing issues for homeowners and tenants to assist them in improving their housing conditions and in meeting the responsibilities of tenancy or homeownership.

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.

The purpose of form HUD-1010 is to streamline the collection of inquiries from the public regarding their requests for information on affordable housing programs offered by the Department. By creating this "Public Access Link," information from the public would be collected by the Executive Secretariat for the purposes of responding to inquiries from constituents regarding the numerous housing programs available to the public.

With the current collection process, the Department has used this information to provide appropriate responses specific to the inquiries. In addition, we have been able to create specific template responses for like inquiries to ensure a rapid response.

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.

The collection of information specific to the use of the Executive Secretariat involves the use of the Workflow Case Tracking and Processing, which is a correspondence tracking system. This allows the electronic movement of documents throughout the Department to provide appropriate responses specific to the inquiry.

Creating form HUD-1010 will significantly streamline the process of collecting data, information, and inquiries from the public, reducing the workload while increasing response times.

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.

This does not apply as there is no duplication of efforts with form HUD-1010.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The information collected on form HUD-1010 will not impact small businesses or other small entities.

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.

The collection of this information would continue regardless of the creation of form HUD-1010. However, failure to pursue process improvement methods to streamline existing procedures would be counterintuitive to a commonsense approach to increase efficiencies in performance.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner: (PLEASE ANSWER EACH BULLET SEPARATELY)

* requiring respondents to report information to the agency more often than quarterly;
There are no special circumstances that would require respondents to report more than quarterly.

* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
There are no special circumstances that would require respondents to provide a written

response to a collection of information in fewer than 30 days after receipt of it.

- * requiring respondents to submit more than an original and two copies of any document;
There are no special circumstances that would require respondents to submit more than an original and two copies of any document.
- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
There are no special circumstances that would require respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years.
- * in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
There are no special circumstances in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
There are no special circumstances requiring the use of a statistical data classification that has not been reviewed and approved by OMB.
- * 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;
There are no special circumstances 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.
- * requiring respondents to submit proprietary trade secrets, 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.
There are no special circumstances requiring respondents to submit proprietary trade secrets, 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.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Not applicable

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

HUD does not provide payments or gifts to respondents in exchange for a benefit sought.

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

HUD secures and protects the electronic transfer of sensitive information by means of CMS/HCS transmission, using firewall protection, encryptions, and restricted access security.

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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of sensitive nature.

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. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden

estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

* 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.

Annualized Burden Hours and Costs

Information Collection / Type of Respondent	Form Name / Form Number	Number of Respondents	Frequency of Response	Responses Per Year	Average Burden Hours Per Response	Annual Burden Hours	Hourly Cost per Response (Hourly Wage Rate)	Total Annual Respondent Cost
Not-For-Profit Institutions	Public Access Link	4,274	1	4,274	.15	641	\$18.68	\$11,973.88
TOTALS		4,274		4,274		641		\$11,973.88

Note: The "Avg. Hourly Wage Rate" for each respondent includes a 1.46 multiplier to reflect a fully-loaded wage rate.

The estimated total burden hour cost is estimated to be **\$11,973.88** annually.

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and

software; monitoring, sampling, drilling, and testing equipment; and record storage facilities.

* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process, and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

Review of information collected using this instrument will require 6 minutes of the federal agency receiving the form for the Public Access External Link, typically at the GS-9 step 3 level (\$66,077). This level of effort is estimated to cost an average of 28,941.73 annually.

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs: Salient There is an annual cost to HUD to maintain the Housing Counseling System, which is utilized to collect form HUD-1010.	N/A
Staff Salaries: (2) GS-09, step 3 employees spending approximately 25% of time annually reviewing quarterly reports for this data collection. (1) (GS-09, Step 3 - \$66,077 = \$66,077 x 1.46 (wage rate multiplier) = 96,472.42 x .15 of time spent = \$14,470.86 x 2 (employees) = \$28,941.73	\$28,941.73
Facilities [cost for renting, overhead, etc. for data collection activity]	N/A
Computer Hardware and Software [cost of equipment annual lifecycle]	N/A

Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	N/A
Travel	0.0
Printing [number of data collection instruments annually]	0.0
Postage [annual number of data collection instruments x postage]	0.0
Other	0.0
Total	\$28,941.73

*Note: The "Salary Rate" includes a 1.46 multiplier to reflect a fully-loaded wage rate.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I. All revisions or changes to the collection should be described here.

New collection

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Not applicable

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.

Not applicable

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

Not applicable

B. Collections of Information Employing Statistical Methods.

Not applicable