

# Supporting Statement for Paperwork Reduction Act Submissions

## Equity in Housing Counseling Survey

OMB Control Number: 2502-0623

### 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 Office of Housing Counseling is responsible for administration of the Department's Housing Counseling Program, authorized by Section 106 of the Housing and Urban Development Act of 1968 (12 U.S.C. - 1701x). The Housing Counseling Program supports the delivery of a wide variety of housing counseling services to homebuyers, homeowners, low-to moderate-income renters and the homeless. The primary objectives of the program are to expand homeownership opportunities, preserve homeownership and improve access to affordable housing. The housing counselors provide guidance and advice to help families and individuals improve their housing conditions. An expansion of these services may include assessing an agency's ability and capacity to provide housing, financial, and other related services to a targeted population such as minorities, low to moderate income and students.

To participate in HUD's Housing Counseling program, a housing counseling agency must be approved by HUD, or designated as a Subgrantee or Affiliate of a HUD-approved Intermediary, Multi-state organization, or a State Housing Finance Agency, pursuant to HUD regulations at 24 CFR Part 214. A Participating Agency shall deliver housing counseling services consistent with the agency's Housing Counseling Work Plan.

The Office of Housing Counseling views this survey as an excellent opportunity to collect data pertaining to the Housing Counseling agency's ability to communicate, operate remotely, provide accommodation for linguistically challenged clients, disabled persons, minorities, and students that will be used to identify and provide additional support and assistance to the agencies and their clients such as training and best practices that promote racial equity. The data will also be used to assist agencies in locating the best resources for assistance such as partnering with local resources like Historically Black Colleges and Universities (HBCUs) and Minority Serving Institutions (MSIs) that may provide agencies with additional assistance and resources. The Office of Housing Counseling is committed to taking a comprehensive approach to leverage the power of housing counseling along with our partners, to achieve racial equity in housing.

**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 "The Equity in Housing Counseling Survey" is an assessment instrument developed by

HUD's OHC -. The listening sessions will be conducted via Teams or GoToWebinar. The listening sessions are a form of information exchange that will be conducted similarly to a focus group that will include a discussion of the survey results and breakout sessions aimed at collecting valuable information about the participants' experiences with language, racial and cultural barriers that exist as it relates to housing counseling. The purpose of the survey and the listening sessions are to collect information from HUD Participating Housing Counseling agencies that will be used to identify and develop innovative programming and best practices for the Department's Housing Counselling Program under Section 106 of the Housing and Community Development Act of 1974. The survey and listening sessions will afford us the opportunity to support and reinforce the critical importance of housing counseling in supporting the nation's housing needs and to realize our mission to ensure that families have the knowledge they need to obtain, sustain, and retain their housing. Information collected will include data status pertaining to the Housing Counseling agency's ability to communicate, operate remotely, provide accommodation for linguistically challenged clients, disabled persons, minorities, and students. Additionally, the information collected will be used to identify and provide additional support and assistance to the agencies and their clients.

**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 "Equity in Housing Counseling Survey" would be conducted by a survey instrument such as SurveyMonkey. An alternative form of collection such as an Excel Spreadsheet sent to the agencies would increase burden as the agency would need to save and then send the completed survey back to the Office of Housing Counseling via email. The Excel form of a survey would not be automated and would not provide prompts to assist the agency in its completion. The use of Survey Monkey automates the process, requiring that the agencies complete the questions and then transmit the survey to HUD by way of a submit button. No additional steps are required. If the agency does not properly complete a question, they are prompted of their discrepancy before allowing them to move to the next set of questions. Agencies are sent a link to the survey via email.. This collection requests information necessary to determine the extent of housing counseling services provided by agencies to specific clients, such as minorities, and will be used to identify opportunities to provide support and reinforce the critical importance of housing counseling in supporting the nation's housing needs. The listening sessions will be conducted via Teams or GoToWebinar. The listening sessions are a form of information exchange that will be conducted similarly to a focus group that will include a discussion of the survey results and breakout sessions aimed at collecting valuable information about the participants' experiences with language, racial and cultural barriers that exist as it relates to housing counseling. The participant's will assist in providing a deeper insight into these barriers that will help OHC in continuing to identify and develop innovative programming and best practices to make the dream of homeownership and the security and wealth creation that comes with it a reality for more Americans.

**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.**

Although -OHC does collect vital information from its agencies concerning services, demographics, and income levels, we are not currently collecting information from the agencies on its perceived capacity in serving specific target populations. Therefore, there is no duplication of other sources for this information.

**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.**

HUD makes every effort to minimize the burden of information collection to all organizations participating in the Housing Counseling Program. Only information critical to evaluating an organization's compliance with program requirements is collected.

**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.**

If there was not an assessment of the Operational and Capacity Status of Housing Counseling Agencies, HUD would not be able to provide the necessary support and assistance to housing counseling agencies and their clients to assist in the support and reinforcement of the critical importance of housing counseling in supporting the nation's housing needs and to realize our mission to ensure that families have the knowledge they need to obtain, sustain, and retain their housing.

**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 information to the agency more often 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 prepare 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 that would require 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; or

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 that would require 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.**

In accordance with 5 CFR 1320.8(d), a 60-day Federal Register Notice soliciting public comments was announced in the Federal Register on May 6, 2022, Volume 87, Page 27177. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on September 26, 2022-, Volume 87, Page 58368. No comments were received.

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

There are no payments or gifts to respondents with respect to this collection.

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

There is no PII collected in this survey. No assurances of confidentiality are provided for this information collection.

**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 a sensitive nature included with this collection.

**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.

**Estimated Annualized Burden Hours and Costs**

<b>Information Collection / Affected Public</b>	<b>Form Name / Form Number  Collection Tool</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Responses Per Year</b>	<b>Average Burden Hours Per Response</b>	<b>Annual Burden Hours</b>	<b>Hourly Cost per Response  (Hourly Wage Rate)</b>	<b>Total Annual Respondent Cost</b>
Not for-profits Institutions	Equity in Housing Counseling Survey	1,219	1	1,219	.25	304.75	\$50.71	\$15,453.87
Not for-profits Institutions	Equity in Housing Counseling Listening Sessions	25	1	25	3	75	50.71	\$3803.25
<b>TOTALS</b>		<b>1,244</b>		<b>1,244</b>		<b>380</b>		<b>\$19,257.12</b>

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

"Type of Respondent" should be entered exactly as chosen in Question 3 of the OMB Form 83-I.

**Note:** The Annual Burden Hours numbers in the above table has been rounded up to be consistent with OMB's ROCIS system.

**Instruction for Wage-rate category multiplier: Take each non-loaded "Avg. Hourly Wage Rate" from the BLS website table and multiply that number by 1.46. For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.46, and the entry for the "Avg. Hourly Wage Rate" would be \$62.06.**

According to the U.S. Department of Labor, Bureau of Labor Statistics website ([https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm)) the median wage rate category for Business and Financial Operations Occupations (13-0000) is estimated to be \$34.73 (hourly wage rate) x 1.46 (the wage rate multiplier) = \$50.71 (fully loaded wage rate), therefore, the estimated burden hour cost to respondents for Business and Financial Operations Occupations is estimated to \$19,257.12 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 recordkeeping, 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.**

#### Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs: N/A	\$0
Staff Salaries:  (4) GS - 13, step 3 employees spending approximately 25% of time annually reviewing the reports, planning and implementing listening sessions, and analyzing the data from the survey and listening sessions. (1) (GS-13, Step 3 - \$113,944.00 = \$113,944.00 x 1.46 (wage rate multiplier) =166,353.24 x .25 of time spent = \$41,589.56. (times 4 employees)	\$166,358.24
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	N/A

Printing [number of data collection instruments annually]	N/A
Postage [annual number of data collection instruments x postage]	N/A
Other	N/A
<b>Total</b>	<b>\$166,358.24</b>

\* 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.**

This is a request for a revision of a currently approved collection. The numbers of respondents, and associated burden hours for the Equity in Housing Counseling Survey have changed since the last OMB approval due to the number of respondents that were sent the survey. The original burden hours were 300 but have slightly increased to 379.75 due to the increase in the number of respondents and the addition of the listening sessions. Therefore, the burden hours are positive program changes. We also added sharing and receiving feedback on the survey's findings with our industry partners, as well as internal and external stakeholders during various listening sessions hosted by the Office of Housing Counseling. These listening sessions will play a vital part in enabling OHC to advocate for, and reinforce the critical role of, housing counseling in meeting the nation's housing needs during the COVID-19 pandemic and related economic downturn, as well as to fulfill its mission of ensuring that families have the knowledge necessary to obtain, sustain, and retain housing.

**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.**

There are no plans to share the data on the HUD Exchange, but the survey results will be shared during Fair Housing Month at a Virtual Research Symposium on the impact of Pre-Purchase Housing Counseling which is set for April 2022. It is also equally important for OHC to continue to share and receive feedback on the survey's findings with our industry partners, as well as internal and external stakeholders during various listening sessions hosted by the Office of Housing Counseling. These listening sessions will play a vital part in enabling OHC to advocate for, and reinforce the critical role of, housing counseling in meeting the nation's housing needs during the COVID-19 pandemic and related economic downturn, as well as to fulfill its mission of ensuring that families have the knowledge necessary to obtain, sustain, and retain housing.

**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.**

HUD will display the expiration date for OMB approval of this information collection.



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

HUD does not request an exception to the certification of this information collection.

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

There is no statistical methodology involved in this collection.