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.

1. Agency/Sub agency Originating Request:
U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

2. OMB Control Number:
a. OMB-2577-NEW
b. ☐ None

3. Type of information collection: (check one)
   a. X New Collection
   b. Revision of a currently approved collection
   c. Extension of a currently approved collection
   d. Reinstatement, **without change**, of previously approved collection for which approval has expired
   e. Reinstatement, **with change**, of previously approved collection for which approval has expired
   f. Existing collection in use without an OMB control number

For b-f, note item A2 of Supporting Statement instructions.

4. Type of review requested: (check one)
   a. X Regular
   b. Emergency - Approval requested by
   c. Delegated

5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities?
☐ Yes ☒ No

6. Requested expiration date:
   a. Three years from approval date b. Other (specify)

7. Title:
Receivership, Troubled, Substandard, At-Risk Program

8. Agency form number(s): (if applicable)
HUD-#####

9. Keywords:
At-Risk/Receivership/Substandard/Troubled

10. Abstract:
The purpose is to provide PHAs in receivership, designated troubled or substandard, or otherwise at risk with funds for costs associated with public housing asset improvement. This Narrative must describe two Impacts of Performance outcomes: Physical Condition and Occupancy.

11. Affected public: (mark primary with "P" and all others that apply with "X")
   a. X Individuals or households
   b. X Business or other-for-profit
   c. X Not-for-profit institutions
   e. X Farms
   f. X Federal Government
   g. P State, Local or Tribal Government

12. Obligation to respond: (mark primary with "P" and all others that apply with "X")
   a. X Voluntary
   0. P Required to obtain or retain benefits
   a. P Mandatory

13. Annual reporting and recordkeeping hour burden:

a. Number of respondents 110
b. Total annual responses 1
Percentage of these responses collected electronically 100%
c. Total annual hours requested 540
d. Current OMB inventory
e. Difference (+, -)
f. Explanation of difference:
Program change:
1. Adjustment:

14. Annual reporting and recordkeeping cost burden: (in thousands of dollars) Do not include costs based on the hours in item 13.

a. Total annualized capital/startup costs $0.00
b. Total annual costs (O&M) $21,774
c. Total annualized cost requested $0.00
d. Current OMB inventory $0.00
e. Difference $0.00
f. Explanation of difference:
1. Program change:
2. Adjustment:

15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X")

a. P Application for benefits
b. X Program evaluation
c. X General purpose statistics
d. X Audit
e. X Program planning or management
f. X Research
g. P Regulatory or compliance

16. Frequency of recordkeeping or reporting: (check all that apply)

a. Recordkeeping b. Third party disclosure
c. Reporting:
1. On occasion 2. Weekly 3. Monthly
4. XQuarterly 5. Semi-annually 6. XAnnually

17. Statistical methods:

Does this information collection employ statistical methods?
Yes
No

18. Agency contact: (person who can best answer questions regarding the content of this submission)

Name: Candace Simms
Phone: 410-209-6589

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:	Date:
X	

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.

The Transportation, Housing and Urban Development and Related Agencies Appropriations Act of 2021, enacted on December 27, 2020, appropriated fifteen (15) million dollars for emergency grants to improve the asset management condition of housing owned by public housing authorities (PHAs) in receivership, troubled, substandard, or at-risk status. To be eligible for this funding, a PHA must provide a narrative description of the physical needs and condition of the Asset Management Property (AMP); a plan with actions to address the issues at the AMP; and a projection of the impact of those actions on the AMP's performance (physical condition and occupancy).

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.

This is a new collection. The narrative will accompany a completed HUD Form 50075.1 (HUD Form 50075.1 has been approved separately under OMB Control Number 2577-0157.), The total narrative for Rating Factor 3, Subfactors B and C, shall be no longer than six pages, double-spaced 12-point font and contain separate responses for each Subfactor. For all elements of Rating Factor 3, HUD will evaluate the submissions of eligible applications and will determine point scores that, in HUD's sole determination, reflect the extent to which the submission is responsive to the criteria described and, as a result, represent the applicant's likely ability to utilize grant funding to expand opportunities for affordable housing in the communities served and to improve its Public Housing Assessment Score (PHAS) to a non-troubled designation.

Post-award reporting requires PHAs awarded under this program to use Energy Performance Information Center (EPIC) to complete annual reports within 60 days of each annual anniversary of award. All other reporting (e.g. in financial systems) already required in the Capital Fund formula grant program or the Moving to Work program shall continue to apply.

Budget narrative (Subfactor A, 15 points). Narrative will accompany the completed Form 50075.1, Parts I and II (as described in NOFO Section IV.B.2, Format and Form), which Form 50075.1 must include the work activities proposed to be funded under this grant and the estimated costs, as directed in form headings and instructions. Form 50075.1 Parts I and II must include the AMP name, number, and address(es) as it is identified in the IMS/PIC system.

Applicants should describe the impact the proposed expenditures will have on the overall capacity of the PHA to deliver significant positive improvements in quality affordable housing for residents. The description should include the total number of housing units for which capital improvements will be provided and a qualitative description as to the impact of the proposed improvements on the affected units. The PHA should provide other relevant information to demonstrate its budget for proposed expenditures will represent a highly efficient and effective use of HUD grant resources. This qualitative data includes a detailed breakdown of work activities and estimated costs and will be assessed points for this subfactor. Fewer points will be awarded for lack of clarity, lack of detail, not responding fully to the criteria, or proposing ineligible use of funds (eligible uses are listed in Section IV.F.1 of the relevant NOFO).

Applicant capacity narrative (Rating Factor 3, Subfactor B, 20 points). This funding is intended to improve an AMP's performance through targeted capital improvements at the AMP identified in the application. To evaluate the overall capital improvement plan, HUD requires an understanding of the PHA's capital improvement strategy and the PHA's capacity to execute on that strategy.

Applicants must provide a narrative that demonstrates the resources the PHA will be able to commit to successfully accomplish this capital improvement effort, including confidence in the independent cost estimate undergirding the proposed budget, the PHA staffing to be dedicated to this effort, any anticipated contractors, other funds (whether from HUD or other sources) or in-kind resources that may contribute to this effort, and any other resources (funding skills) that serve to provide assurance for the success of this effort.

Recognizing past internal and external challenges that have precipitated the current situation at the PHA and the subject AMP, the Capacity Narrative should describe what has changed in the circumstances of the PHA that provides confidence to HUD that a grant for the proposed effort has a very high likelihood of succeeding and, as a result, provides expanded opportunities for stable affordable housing for residents and a stronger PHA.

Anticipated outcomes narrative (Rating Factor 3, Subfactor C, 25 points). The PHA should provide a narrative describing the specific capital scope of work that will be completed and the strategies the PHA intends to use to occupy the units at the completion of the capital improvement project.

This Narrative must describe two anticipated outcomes:

Impact on Performance — Physical Condition (15 points). In the narrative, applicants must describe how the capital improvements at the AMP will improve the physical condition at the AMP. Using the most recent physical inspection report for the AMP as a baseline, the narrative should describe how the capital improvements will address the deficiencies identified within the report. In addition, the PHA must project what it believes the physical score will be once the work is completed. Points will be awarded based on HUD's assessment of the reasonableness of the applicant's projection of the physical score once the work is completed, assessing whether the proposed use of funds aligns with correcting the deficiencies contained in the most recent physical inspection report.

Impact on Performance — Occupancy (10 points). In the narrative, applicants must provide justification that the capital improvements at the AMP will increase occupancy at the AMP. HUD will use the narrative to evaluate the applicant's strategy for occupying units quickly. Using the most recently approved audited FDS submission as a baseline, the narrative should provide a sound basis for determining that the capital improvements at the targeted AMP will increase the unit-months leased. In addition, the PHA must project what it believes the occupancy rate will be once the work is completed. The projection must be supported in the narrative with appropriate occupancy strategies and be reasonable based upon the timeframes identified for the completion of the capital improvements.

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).**

   All narrative responses will be submitted electronically through the System for Award Management (SAM) portal. SAM means the Federal Repository into which an entity must provide information required for the conduct of business as a recipient. Registration with SAM is required for submission of applications via Grants.gov. You can access the website at https://www.sam.gov/SAM/. There is no cost to use SAM. Applicants must provide a valid DUNS number, registered and active at https://www.sam.gov/ in the application.

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 Collection does not collect duplicate information. Use the information received on the forms.

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.**

   Efforts were made to minimize the burden placed on all applicants, while at the same time ensuring that sufficient information would be provided to allow HUD to determine and select the best proposals.

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.**

All information collected is used to carefully consider applications for funding; if HUD collects less information, or collected it less frequently, the Department could not determine the eligibility of applicants for grant funds and applicants would not be eligible to receive funding for that fiscal year.

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;

  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 in the Federal Register, Volume 86; Page 67968 on November 30, 2021. The public was given until January 31, 2022, to submit comments on the proposed information collection.

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

NOT APPLICABLE

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

    No assurance of confidentiality is provided to respondents for this 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.**

    NOT APPLICABLE

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	*Average Number of Reponses per Respondent	Total Annual Responses	Burden Hours per Response	Total Hours	Hourly Cost	Total Annual Cost
Narrative	100	1	100	6	600	$32.02	**$19,212**
Post-award Reporting	10	1	10	8	80	$32.02	**$2,562**
TOTALS	110	varies	110	varies	680		**$21,774**

Totals varies **Total Responses:** varies **Total Hours:** 680

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

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.**

    Not Applicable

14. **Estimate annualized costs to the Federal government.**

    GS-12 rate of $32.02 times 110 anticipated respondents equals $3,522 rounded performed once equals $3,522 annualized costs to the Federal government. (($32.02 x 110 = $3,522) x 1) = $3,522

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

    NOT APPLICABLE

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

    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.**

    NOT APPLICABLE

B. Collections of Information Employing Statistical Methods