Paperwork Reduction Act Submission

Please read the instruction before completing this form. For additional forms or assistance in completing this forms, 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/Subagency Originating Request:
U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

2. OMB Control Number:
a. **2577-0178** b. None

3. Type of information collection: (check one)
- a. ☐ 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. ☒ 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:
Family Self-Sufficiency Program (FSS)

8. Agency form number(s): (if applicable)
HUD-52650, HUD-52651, HUD-52652, HUD-50058, HUD-2880, , SF-424, SF-LLL, HUD-1044.

9. Keywords:

Housing, public housing, rent subsidies, self-sufficiency, funding application

10. Abstract:
Public Housing Agencies (PHAs) and Multifamily Owners enter into a Contract of Participation with each eligible family that opts to participate in the program; consult with local officials to develop an FSS Action Plan; and report annually to HUD on implementation of the FSS program. PHAs and owners may apply for funding to pay the salary (including fringe benefits) of FSS program coordinators. This Revision represents a revision under the Final Rule implementing regulations pursuant to the new FSS statute established as Section 306 of the Economic Growth, Regulatory Relief, and Consumer Protection Act (P.L. 115-174) on May 24, 2018.

11. Affected public: (mark primary with "P" and all others that apply with "X")
- a. Individuals or households
- b. Business or other for-profit
- c. **x** Not-for-profit institutions
- e. Farms
- f. 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. Voluntary
- b. **P** Required to obtain or retain benefits
- c. Mandatory

13. Annual reporting and recordkeeping hour burden:

a. Number of respondents	800
b. Total annual responses	800
Percentage of these responses collected electronically	100%
c. Total annual hours requested	71,126
d. Current OMB inventory	67,257
e. e. Difference (+,-	+3868
f. Explanation of difference:	
1. Program change:	
2. Adjustment:	+3868

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
b. Total annual costs (O&M)	0
c. Total annualized cost requested	0
d. Current OMB inventory	0
e. Difference	0
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. General purpose statistics
- d. Audit
- e. **X** Program planning or management
- f. Research
- g. **X** 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. ☐ Quarterly
  5. ☐ Semi-annually
  6. ☒ Annually
  7. ☐ Biennually
  8. ☐ Other (describe)

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: Anice Chenault
Phone: FSS@hud.gov

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 collected (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 Robert Mulderig, Deputy Assistant Secretary, Office of Public Housing Investments	Date:

Signature of Senior Officer or Designee: X Colette Pollard, Departmental Reports Management Officer Office of Chief Information Officer	Date:

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification

1. The Family Self-Sufficiency (FSS) Program is authorized under Section 23 of the United States Housing Act of 1937 and re-authorized under Section 306 of the Economic Growth, Regulatory Relief, and Consumer Protection Act (P.L. 115-174) on May 24, 2018. The purpose of the FSS program is to develop local strategies to coordinate the use of public housing and Section 8 housing choice voucher (HCV) rental assistance and project-based rental assistance (PBRA) (AKA Multifamily) with support services provided by public and private resources to enable families to achieve economic independence and self-sufficiency.

2. Each Public Housing Agency (PHA) or Multifamily owner carrying-out a local FSS Program must enter into a Contract of Participation (Form HUD-52650) with each eligible family that opts to participate in the program. The contract enumerates the services of the local FSS Program that are made available to tenants, as well as the responsibilities and obligations of the participating family. The Contract of Participation is required by law (Section 23(c) of the U. S. Housing Act of 1937, as added by Section 554 of the Cranston-Gonzales National Affordable Housing Act, P.L. 101-625) and Section 306 of the Economic Growth, Regulatory Relief, and Consumer Protection Act (P.L. 115-174).

   Each PHA/owner must consult with local officials to develop an FSS Action Plan containing descriptions of the size, characteristics, and needs of the population to be served by its proposed self-sufficiency program; the services and activities to be provided by both public and private resources to FSS families; how the program will be implemented; a time-table for implementation; a certification of coordination in the development of the services and activities; and other information necessary for HUD to determine the soundness of the PHA's/owner's proposed FSS program. The Plan will be submitted to HUD as required by law (Section 23 (g) of the U. S. Housing Act of 1937 as added by Section 554 of the Cranston-Gonzalez National Affordable Housing Act, P.L. 101-625) and Section 306 of the Economic Growth, Regulatory Relief, and Consumer Protection Act (P.L. 115-174).

   PHAs/owners must establish an FSS escrow account for each family participating in the program. The amount of the escrow credit is based on increases in the family's total tenant payment resulting from increases in the family's earned income during the term of the FSS contract. PHAs may use Form HUD-52652 and FSS Escrow Account Credit Worksheet - PIH or FSS Escrow Account Credit Worksheet - MF, to determine escrow credit for each participating family.

   Submittal of annual reports to HUD is required by law (Section 23(1) of the U. S. Housing Act of 1937, as added by Section 554 of the Cranston-Gonzalez National Affordable Housing Act, P. L. 101-625) and Section 306 of the Economic Growth, Regulatory Relief, and Consumer Protection Act (P.L. 115-174). PHAs generally fulfill their annual FSS reporting requirements by completion of the FSS addendum to the Form HUD-50058. The burden hours for the reporting through the HUD-50058 are covered under OMB control number 2577-0083.

   The application form, HUD-52651, for FSS Program Coordinator funding is necessary to ensure compliance with Section 102 of the Department of Housing and Urban Development Reform Act of 1989 (42 U.S.C. 3545) (HUD Reform Act) and the regulations codified in 24 CFR part 4, subpart A which contain provisions to ensure greater accountability and integrity in provision of` assistance administered by HUD. Additional forms used in the application package are the SF-424, OMB approval # 0348-0043; SF-LLL, OMB approval # 0348-0046,

3. As part of the ongoing implementation of the Electronic Government (E-Government) component of the President's Management Agenda, all application packages for funding of salaries for Family Self-Sufficiency coordinators are submitted to HUD electronically by PHAs/owners. In addition, information from each family's Escrow Credit Worksheet, HUD-52652, and FSS Contract of Participation, HUD-52650, is submitted to HUD electronically by PHAs using the HUD-50058, Family Report. Multifamily owners submit the PBRA FSS Program Reporting tools.

4. There is no duplication of effort. Information collected is unique to each participant and does not duplicate any similar information.

5. The information being collected has no significant impact on small businesses or other small entities. The burden associated with such collection of information is the minimum needed for program monitoring.

6. Federal program requirements, policy activities and statutory mandates would not be met if the collection is not conducted, or is conducted less frequently. This information must be collected so that funds for the salaries of FSS coordinators may be awarded timely to qualified applicants.

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. HUD published a Notice of Proposed Information Collection for public comments in the Federal Register Volume 86; Number 217; Page 62964 on November 15, 2021, re-opening comments on the proposed rule published September 21, 2020, at 85 FR 59234 for comments on the PRA only. . The public was given until December 15, 2021, to submit comments on the Proposed Information Collection. HUD received one public comments on this Proposed Information Collection. The comment was unrelated to the Collection.

9. No payment or gifts to respondents are provided.

10. Assurance of confidentiality is neither provided nor needed.

    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. No sensitive questions are being asked.

12. Estimated Annual Reporting and Recordkeeping Burden

Description of Information Collection	Number of Responses	Responses per Year	Total Annual Responses	Hours per Response	Total Hours
Application					
SF-424 - Application for Federal Assistance including SF-424-B	800	1	800	0	0
SF-LLL - Disclosure of Lobbying Activities	40	1	40	0	0
Form HUD 2880 - Applicant, Recipient, Disclosure, Update Form (OMB No. 2510-0011)[1]	800	1	800	0	0
NOFO Narrative	100	1	100	10	1,000
Form HUD-52651 - FSS Application	100	1	100	1.5	150
Notice of Award and Terms & Conditions (AKA Grant Agreement*)	800	1	700	N/A	N/A
Implementation					
Action Plan-New Grantees	100	1	100	10	1,000
Action Plan-One time Update for One year Only After the new Regulation is effective	700	1	700	5	3,500
Form HUD-52650 - Contract of Participation	1,500	1	1,500	.25	375
Form HUD-52652 – Sample Escrow Account Credit Worksheet - PIH	750	100	75,000	.85	63,750
Form ## - Sample Escrow Account Credit Worksheet - MF	50	50	2,500	.85	2,125
Cooperative Agreements	25	1	25	2	50
Reporting					
Annual Report (Narrative)/ Performance Report	800	1	800	1	800
Form HUD-50058 – Family Report (OMB No. 2577-0083)	750	100	75,000	0	0
Monitoring Review Self-Assessment Checklist	750	.20	150	2	300
PBRA FSS Program Reporting	200	1	200	1	200
Total				**33.7**	**73,251**

*HUD-1044, Award/Amendment is completed by HUD staff, signed by the recipient of the grant, and returned to HUD. This form is a certification and HUD ascribes no burden to its use.

The estimate of the total annual cost burden to respondents/recordkeepers resulting from the collection of this information is: **73,251 burden hours x $38.03 per hour = $2,785,735.53** ; assuming an hourly rate at the GS-12/Step 1 level.

13. There are no additional costs to the respondents.

14. Estimated annualized cost to the Federal Government for this collection:

	No. of	Hrs. Per	Annual	Cost	Cost to

[1] Burden hours for forms showing zero burden hours in this collection are reflected in the OMB approval number cited or do not have a reportable burden.

	Responses	Response	Hrs	Per Hr.	Fed/yr
Action Plan	100	10	1000	$38.03*	$38,030
Reporting	800	01	800	$38.03	$30,424
Funding Application	8504various		1,150.85	$38.03	$43,734.50
Total Cost					**$82,188**

*Assumes an hourly rate at the GS-12/Step1 level.

15. On September 21, 2020, at 85 FR 59234, HUD published a proposed rule titled "Streamlining and Implementation of Economic Growth, Regulatory Relief, and Consumer Protection Act Changes to Family Self-Sufficiency (FSS) Program." The 2020 proposed rule would revise the FSS Program regulations to implement statutory requirements, and to reduce burden and streamline the program for PHAs, Multifamily (Project-Based Rental Assistance (PBRA)) owners, and eligible families. The public comment period closed on November 20, 2020, and HUD received 105 public comments in response to the 2020 proposed rule.

HUD has since determined that changes to the information collection requirements described in the 2020 proposed rule would be necessary for implementation of the rule or would help the program operate more efficiently. Specifically, HUD notes that all entities that currently operate FSS programs would have to update their Action Plans one time after the new rule becomes effective in order to incorporate regulatory changes, and that PHAs would be required to complete a monitoring self-review checklist for program compliance and reporting once every five years. Additionally, while the 2020 proposed rule noted that the information collection requirements would include paperwork for Multifamily owners, it did not explicitly account for Project-Based Rental Assistance (PBRA) FSS Program Reporting in the description of the information collection.

Additionally, HUD is revising recordkeeping and recording burden estimates for other collection information instruments that were discussed in the 2020 proposed rule.

- First, HUD anticipates that more funding may be appropriated for the FSS program than HUD anticipated when the 2020 proposed rule was published. Specifically, HUD anticipates that funding will be adequate to support 800 grantees. As a result, HUD is increasing from 750 to 800 the estimate of responses to the SF-424 ("Application for Federal Assistance").
- HUD is adjusting to 800 the estimate of responses to the Grant Agreement and the Annual Report/Performance Report.
- Of these 800 grantees, HUD estimates that approximately 100 will be new grantees. As such, HUD revises the estimate for responses for the NOFA narrative and for Form HUD-52651 ("Family Self-Sufficiency (FSS) Program Coordinator Funding") to 100.
- Similarly, HUD estimates that 100 new grantees will submit new Action Plans and estimates that the development of new plans will take 10 hours each.
- Estimating that about half of these 100 new grantees will be PHAs and the other half will be Multifamily owners, and therefore 750 grantees will be PHAs, HUD estimates that there will be 750 annual respondents for Form HUD-50058 ("Family Report") and Form HUD-52652 ("Sample FSS Escrow Account Credit Worksheet - PIH") and 50 grantees using the "Sample FSS Escrow Account Credit Worksheet – MF."
- As a result of expected additional FSS funding, HUD has also adjusted the expected number of responses for Cooperative Agreements up to 25 from 15, and the number of responses for Form HUD-52650 ("Family Self-Sufficiency (FSS) Program Contract of Participation") up to 1,500 from 1,000.
- Additionally, HUD is removing the burden estimate that appeared in the proposed rule for Form HUD-2994-A ("You are Our Client! Grant Applicant Survey") (optional), because the form is not in use and
- is removing Form HUD-52755 ("Sample Contract Administrative Partnership Agreement"), because this form is used only in rare occasions as a corrective action and the sample was only a sample. The form is basically now obsolete..
- Finally, HUD is revising the burden hour estimate for this collection for the SF-424 and SF-LLL forms to 0, because their burden is included in different collections.

16. The information collection results will not be published; the funded grant awards will be published as required by the HUD Reform Act.

17. The expiration date and the OMB approval number will be displayed in the Notice of Funding Availability and on all related forms.

B. Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methods.