

Supporting Statement for Paperwork Reduction Act Submissions

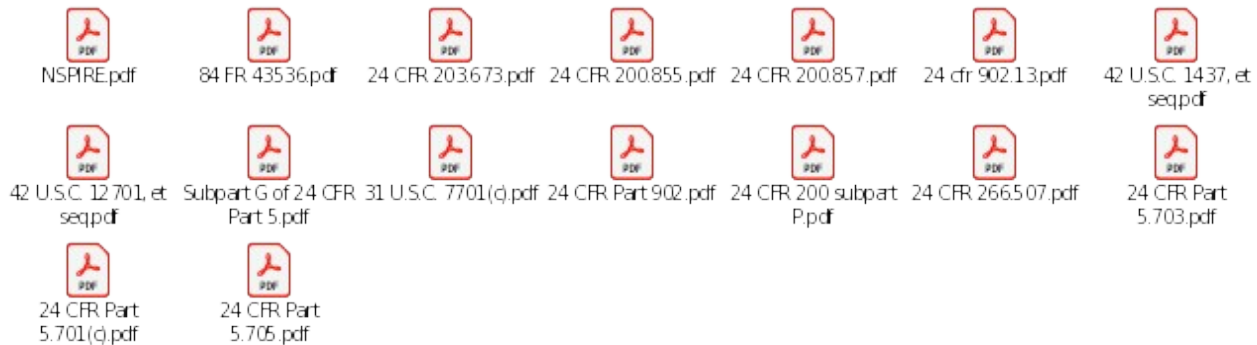
A. Justification

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.**

Remote Video Inspections (RVI's) are innovative and critical tool to expand the Department's capability to perform property inspections pursuant to current guidelines. While initially instituted because of the limits placed on travel and unit access during the COVID-19 pandemic, RVIs now constitute an effective and more efficient manner of completing inspections and Collaborative Quality Assurance (CQAs). Inspectors are limited in the amount of traditional on-site inspections they can perform because of the time required to travel, however the ability to perform an RVI inspection from any location enables more inspections to be performed over time. The Department wishes to utilize all available tools to gain insight into the conditions of the units, and hence, ensure residents' safety.

COVID-19 poses unique challenges that could continue to hinder normal inspection operations on-site. Additionally, the ability to train and further educate contract inspectors has been a challenge; therefore, conducting Remote Video (RV) CQA's ensures that contract inspections are conducted within REAC standards, reflect the actual condition of a property, and that the Inspector of Record's performance is acceptable, even when it is not possible for HUD federal inspectors to be on-site due to scheduling or budget constraints, or a natural disaster. Additionally, HUD is concerned that tenants may be uncomfortable with inspection personnel entering their units in the middle of a pandemic or similar national emergency. Accordingly, there will be instances where residents and property personnel may not feel safe with an in-person inspection. Moreover, existence of life-threatening defects inside units may not be detected without an inspection, which could lead to undesirable safety and security issues that may cause harm to residents. Thus, the Department aims to minimize risk to the residents' health and safety when other unit inspection options may be unavailable by initiating RVI as an alternative approach.

See attachments of the authorities:



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.**

(Remove Video Inspections) RVIs give (Public Housing Authority) PHAs an alternative method to virtualize and fulfill the annual REAC inspection requirement in a more efficient process than the process of performing onsite inspections. The RVI process does not change the current PH inspection requirements. The RVI information collection will inform HUD of (1) the type of Proxy (i.e., the operator of the camera on-site) required and their potential involvement in an RVI, (2) the technology and equipment that are available and insights into if those are appropriate for conducting RVIs, and (3) allow HUD to certify the RVI results provided by the Proxy. In the case of (Remote Video Collaborative Quality Assurance) RV CQAs, information collection will be examined by a program evaluator, which will indicate the need to assign a contract inspector to the inspection and inform HUD of PHA's, (Property Owner Agent)POA's, and residents' willingness to participate. Residents will be involved on a voluntary, case-by-case, and as-

needed basis to serve as a Proxy for inspection of their individual unit, however HUD expects to predominately utilize property maintenance staff as the Proxy while conducting RVIs.

HUD/REAC seeks to use the collected information for scheduling and implementing RVIs and RV CQAs based on the PHA's, POA's, and their residents' RVI readiness, including access to items such as smart devices with front and rear cameras, internet access and affordable wireless plans that can accommodate an RVI or RV CQA. The pre-inspection information collection checklist is designed to understand the PHA's and POA's access to the required technology, internet, and staff who will serve as the Proxy. The post-RVI or RV CQA Survey of Proxies and Contract Inspector is comprised of items about the performance of the RVI and the RV CQA. The post RVI disclosure agreement is comprised of items that assert the Proxy followed the requested RVI procedures and provided valid and accurate information about the condition of the property to the Inspector of Record.

The pre-RVI or RV CQA checklist will be conducted over the phone in a call between the PHA, POA, and the REAC inspector. The information will allow HUD to quickly identify eligible and willing participants for flexible RVIs or RV CQAs. The pre-inspection survey of residents and post-inspection survey of Proxies and survey of contract inspectors will be completely managed and transmitted to HUD by the PHA, POA and the federal inspector. The PHA and POA will transmit the survey responses in MS Excel to the secured and access controlled RVI@hud.gov email in-box. The de-identified survey responses will be stored in separate secured SharePoint sites for RVI and RV CQA. The post RVI disclosure agreement will be completed directly following the RVI and immediately uploaded to RAPID 4.0--REAC's UPCS inspection app that transfers the form directly to HUD's secure system. For NSPIRE, the disclosure agreement will be managed in Salesforce via a secure link that will only capture the completed form. Salesforce will not capture PII for the NSPIRE program. The information collection will ensure meaningful language access for persons with Limited English Proficiency (LEP) so they can fully participate. For example, HUD will work with the PHA or POA to use an interpreter during the RVI. If HUD is unable to accommodate these special circumstances REAC's inspector will revert to a traditional on-site inspection protocol which does not require a resident. In addition, as part of the information collection process, reasonable accommodations will be made, whenever possible, for persons with disabilities and the Department will ensure there is effective communication for persons with disabilities as required under Section 504 of the Rehabilitation Act of 1973. For example, HUD will attempt to accommodate persons with disabilities who can participate in an RVI unless otherwise not feasible due to the physical requirements to conduct an RVI.

Checklist, Survey and Disclosure Agreement Sampling: The checklist respondents will be sampled from representatives of the MF and PH properties who are due for a REAC annual inspection. If it is determined by the Department that residents will be needed to assist in the inspection, the survey of residents will be disseminated. The sample of Proxies (who also complete the disclosure agreement) will be based on the sample of the units.

Survey Management and Dissemination: This data management approach is needed because HUD does not have the authority to collect POA and resident email and or phone numbers. All data collection requests are de-identified. REAC will request that PHAs and POAs commit to meeting HUD's Office of the Chief Information Officer's standards of data security and privacy when completing and transmitting the surveys to prevent spillage of Personally Identifiable Information (PII).

Data Security and Privacy: All RVI and RV CQA checklist and survey data will be stored separately in HUD's secure MS 365 secure systems and the RVI and RV CQA SharePoint sites with restricted access to select HUD staff. Logistics will be handled by select REAC staff trained and dedicated to the RVI project and operations. The disclosure agreement will be securely uploaded into RAPID 4.0 and transferred to HUD's secure systems.

Analysis: The data about the checklist and survey responses will be aggregated to provide a sample of properties to be inspected from the MF and PH programs using the UPCS and NSPIRE inspection RVI and RV CQA protocols. This analysis will be limited to a cross section of RVIs to be used for continuous process improvement.

Risks and Mitigations: The risks in PHAs and POAs conducting the survey of residents are that it may result in low response rates because of residents' misperception of retaliation for comments provided, or lack of interest in

inspections. This may lead to HUD not having access to the unit. HUD will mitigate these potential risks by providing virtual trainings for the PHA, POAs, residents and Proxies, encouraging all POAs and PHAs to gather survey responses from residents and Proxies and send all responses in a batch email to RVI@hud.gov. If low response rates persist for residents, HUD REAC will craft an invitation letter for the PHA and POA that utilizes infographics to highlight the necessary equipment, roles, and responsibilities of the Proxy in the RVI or RV CQA process and its benefits to the ensuring resident health and safety during and after the pandemic. The letter will be provided to the PHA and the POA at the time of scheduling the RVI or RV CQA. If HUD cannot meet its sample for resident-assisted RVIs, HUD will alternatively conduct an on-site inspection. The risk involving persons with disabilities in RVIs is increased risk of injury. The mitigation for this risk is if the person cannot meet the physical requirements, REAC's inspector will identify an alternate proxy or revert to a traditional on-site inspection protocol which does not require a resident for a different unit. The risk involving accommodating persons with limited English proficiency is the timely identification of an interpreter. The mitigation for this risk is if, REAC's inspector cannot find an interpreter for the inspection, the inspector will identify an alternate proxy or revert to a traditional on-site inspection protocol which does not require a resident. Every effort will be made to accommodate resident circumstances. However, the role of the proxy is voluntary, and it is the REAC inspector's job to complete an inspection. If the circumstances surrounding the proxy does not support efficient completion of the inspection, the inspector will revert to a traditional on-site inspection.

Limitations: The pre-inspection logistical checklist and survey of residents, contract inspectors and Proxies are brief and may not fully capture the concerns of residents, contract inspectors and Proxies. To address this limitation, federal inspectors will capture notes about their interactions with the residents, contract inspectors and Proxies to properly route issues through the RVI@hud.gov mailbox and create a Frequently Asked Questions and a lessons-learned tool that can be shared with PHAs and POAs.

Findings: The findings of the checklist and surveys will be used to determine site readiness for an RVI or RV CQA and will be used to plan for and improve RVIs and RV CQAs over time. All findings will be used to determine which sites and HOHs, if needed, are good candidates for an RVI or RV CQA and how to improve the user experience of the supporting Proxy and participating contract inspector. Results from the checklist and resident survey will be used on the day of the REAC inspection. The disclosure agreement will not be used for data analysis.

Conclusions: HUD will be able to determine the RVI or RV CQA readiness of PHAs, POAs, Proxies, and residents' willingness and ability to participate in assessing the conditions of HUD-assisted housing. Using the survey of contract inspectors, HUD will be able to conduct monitoring and oversight of contract inspectors' compliance with REAC inspection standards.

Recommendations: The findings will be used to help improve the living conditions for residents who participate in HUD's multifamily and public housing programs. Recommendations will also be used to continuously improve RVIs and RV CQAs into the inspection programs administered by REAC.

Next Steps: The Checklist and survey findings will be compiled, de-identified (if needed), analyzed, and reported in aggregate to appropriate HUD staff only. This will allow HUD to conduct RVIs and RV CQAs over time and identify health and safety concerns and prompt action to address them which will ultimately result on improved, and safe housing for the families assisted.

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).

Because HUD does not currently collect the email and phone numbers of POAs and residents living in HUD-assisted housing, HUD requests authority to require the PHAs and POAs manage the surveys and send the batched results back to HUD via email without any PII such as name, email and/or phone. However, if PHAs and POAs utilize residents as the Proxy for RVIs or RV CQA, that individual's name and signature will be collected on the disclosure agreement. The disclosure agreement does not collect personally identifiable property information about the resident or the POA. PHAs and POAs can easily disseminate the questions and send the de-identified survey information back to

HUD via email. It is estimated that by having PHAs and POAs collect and share the data with HUD, HUD REAC will increase its ability to reach a higher proportion of residents and Proxies with computers and smart devices.

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.

Currently, HUD REAC does not formally collect information about HUD-assisted housing RVI or RV CQA readiness, residents' willingness and readiness to assist with RVIs or RV CQAs, or the experiences of Proxies or contract inspectors during an RVI or RV CQA or a disclosure agreement. The American Housing Survey does not collect information about HUD-assisted residents' ability and willingness to participate in an RVI or RV CQA. Also, HUD does not have the authority to collect HUD-assisted residents' email or phone on the forms HUD-50059 or HUD-50058, so data cannot be pulled from these sources.

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 Information Collection Request (ICR) to collect RVI and RV CQA checklist information, the resident and Proxy survey, the survey of contract inspectors as well as the disclosure agreement are part of fulfilling HUD's core mission and should not negatively impact small businesses. HUD REAC staff discussed with small groups of PHAs and POAs how to best collaborate on completing RVIs and RV CQAs. Based on this communication and to reduce the burden on PHAs and POAs, HUD developed a voluntary process that uses standardized items that are limited to the minimum information needed to complete and learn from RVIs and RV CQAs. Completion of the disclosure agreement is a pre-condition for serving in the role of the Proxy. Information will be provided to the PHAs and POAs over the phone and via email to decide how they will transfer the submitted survey responses back to HUD's RVI@hud.gov email in-box and the Inspector of Record will upload the disclosure agreement into RAPID 4.0. PHAs and POAs will be reminded not to send PII to HUD.

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.

Without the information in this ICR, RVIs and RV CQAs will be difficult or even impossible to assess if the necessary equipment, and human capital, are not available. RVIs are used for risk-based portfolio execution or when the items at a property are inaccessible, are in dangerous environments, or circumstances prevent an on-site inspection. RV CQA performance ensures that inspections are conducted within REAC standards, and that the Inspector of Record's performance is acceptable. Without the ability to perform RVIs and RV CQAs, HUD may have limited ability to ensure the safety of residents' homes.

By collaborating with PHAs and POAs to share the tools in this ICR and collect the data, they will be able to streamline data collection from properties that meet the technology and human capital requirements. For the surveys, MS Excel will be used to communicate questions with ease and is a common application that can be emailed by PHAs and POAs back to HUD. The disclosure agreement is needed to assert the Proxy follows requested procedures and provides the Inspector of Record with valid information.

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;
HUD REAC issues a 28-day notice to ensure properties are assessed in their current condition. To meet this requirement, responses are requested within less than 30 days.

- 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
HUD will first provide a Disclosure Form, which requests non-confidential information. Then, HUD will provide PHAs and POAs with the standardized checklist and survey questions that do not request Personally Identifiable Information (PII), then have PHAs and POAs commit to meeting HUD's Office of the Chief Information Officer's standards of data security and privacy.
- 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.

. In accordance with 5CFR 1320.8(d), this information collection soliciting public comments was announced in the Federal Register on April 29, 2022, Volume 87, No. 83, Pages 25512. 0 Comments received.

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

Because physical property inspection is a part of HUD REAC's routines and mandated line of business, an incentive for respondents is not requested at this time.

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

The information requested in the checklist, surveys and the Disclosure Form are not considered confidential information. The disclosure agreement, an official HUD form, lists HUD REAC's compliance with confidentiality

standards for PRAs and the Privacy Act of 1974, 5 USC § 552a. No assurances of confidentiality are provided 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.

The Disclosure Form obtains name and signature certification from inspection proxies that UPSC and NSPIRE inspection results are accurate.

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 12.5% (RVI) and 10% (RV CQA) of Properties Inspected overall and then split in half by program type)	Average Number of Responses per Respondent**	Total Annual Responses 12.5% (RVI) and 10% (RV CQA) of Properties Inspected overall and then split in half by program type)	Burden Hours/Minutes per Response	Total Hours	Hourly Cost	Total Annual Cost
PH Pre-Inspection Checklist	813	1	813	.33 hr. (20 min)	271 hrs.	\$36	\$9,756
PH Pre-Remote Video Inspection Survey of Residents	813	1	813	.08 hr. (5 min.)	67.75 hrs.	\$7.5	\$508
PH Survey of RV CQA Contract Inspector	50	1	50	.08 hr. (5 min.)	4.2 hrs.	\$22	\$92
PH Post-Remote Video Inspection Survey of Proxies	813	1	813	.33 hr. (20 min)	271 hrs.	\$22	\$5,962
PH Disclosure Form	813	1	813	.17 hr. (10 min)	135.5 hrs.	\$22	\$2,981
MF Pre-Inspection Checklist	813	1	813	.33 hr. (20 min)	271 hrs.	\$36	\$9,756
MF Pre-Remote Video Inspection Survey of Residents	813	1	813	.08 hr. (5 min.)	67.75 hrs.	\$7.5	\$508
MF Survey of RV CQA Contract Inspector	50	1	50	.08 hr. (5 min.)	4.2 hrs.	\$22	\$92
MF Post-Remote Video Inspection Survey of Proxies	813	1	813	.33 hr. (20 min)	271 hrs.	\$22	\$5,962
MF Disclosure Form	813	1	813	.17 hr. (10 min)	135.5 hrs.	\$22	\$2,981
Totals	6,604*		6,604		1,498.8 hrs.		\$38,598

*Respondents will complete the checklist, surveys and disclosure form for both MF and PH properties.

**Average Number of Responses per Respondent for each Information Collection item = Total Annual Responses / Number of Respondents

REAC Estimates that it will perform 13,000 Inspections per year, with about 12.5% of those being performed as RVIs. It is further estimated that one half of the approximately 1,625 RVIs will be performed under the Multi-Family program and the other half will be performed under the Public Housing program, leading to approximately 813 RVIs per program.

REAC estimates that it will perform about 1,000 CQAs per year, with about 10% of those being performed as RV CQAs. It is further estimated that one half of the approximately 100 RV CQAs will be performed under the Multi-

Family program and the other half will be performed under the Public Housing Program, leading to approximately 50 RV CQAs per program.

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.

N/A

14. Estimate annualized costs to the Federal government.

The cost is based on a GS-13 step 1, mid-level staff position in the government. The average annual salary of \$81,216 is based on the U.S. Office of Personnel Management 2022 Salaries & Wages table. There are 6 inspectors working 20% of the time on RVIs ($(\$81,216 * 0.2) * 6 = \$97,459$) and one program management analyst working 60% on RVIs = \$48,730. The total cost to the government is \$146,189.

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

We are implementing the disclosure form and RV CQA reviews as a part of this revision.

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

The findings from the checklist, Disclosure Form, inspection survey of residents, and inspection survey of Proxies (i.e., Operators) and contract inspectors will not be published to the public and will be used solely to prepare for and improve RVIs and RV CQA.

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.

Once approved by OMB, HUD will display the OMB approval date in the MS Excel spreadsheets and on SharePoint where the information collection is stored.

18. Explain each exception to the certification statement identified in item 19.

Not applicable.

B. Collections of Information Employing Statistical Methods

References

- Arunesh, C., & Pankaj, C. (2011). Ergonomic design of hand tool (screwdriver) for Indian worker using comfort predictors case study. *International Journal of Advanced Engineering Technology*, 2(4), 231-8.
- REAC. 2021. PROGRAM LOGIC MODEL WORKSHEET FOR REMOTE VISUAL COLLABORATIVE QUALITY ASSURANCE.
- U.S. Department of Housing and Urban Development. 2021. Resident Characteristics Report As of March 31, 2021. Retrieved April 6, 2021 from: <https://pic.hud.gov/pic/RCRPublic/rcrmain.asp>
- U.S. Bureau of Labor and Statistics. (2020). Occupational Employment and Wages, May 2020 11-9151 Social and Community Service Managers. Retrieved April 5, 2021 from: <https://www.bls.gov/oes/current/oes119151.htm>
- U.S. Bureau of Labor and Statistics. (2020). Occupational Employment and Wages, May 2020 49-9071 Maintenance and Repair Workers, General Retrieved April 5, 2021 from: <https://www.bls.gov/oes/current/oes499071.htm>
- U.S. Bureau of Labor and Statistics. (2020). Table B-3. Average hourly and weekly earnings of all employees on private nonfarm payrolls by industry sector, seasonally adjusted, General. Retrieved April 5, 2021 from: <https://www.bls.gov/news.release/empsit.t19.htm>
- U.S. Office of Personnel Management. (2022). Salary Table 2022-GS Incorporating the 2.2% General Schedule Increase Effective January 2022. Retrieved February 21, 2022 from: [SALARY TABLE 2022-GS \(opm.gov\)](#)