

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification

1. HUD will require Public Housing Authorities (PHAs) to submit the SF-425 and the Public Housing Grants Support for Payment Vouchers form for certain Operating Fund Grants, Public Housing Grants, or supplemental grants provided to PHAs support their operation and maintenance of public housing developments or respond to federal emergencies, natural disasters, and national emergencies. Currently, these funds include Coronavirus Aid, Relief, and Economic Security Act (CARES Act) supplementary Operating Fund Grants and future grants not yet known grants. HUD further requires PHAs that receive shortfall Operating Fund grants to submit the SF-425 annually, and PHAs that exit the public housing program to submit the SF-425 until the PHA expends all their Operating Fund grants. HUD requests PHAs to complete these forms to report that PHAs obligated and expended public housing grants within the period of performance and that PHAs used the funds on eligible uses as directed by HUD through regulations, guidance, and PIH Notices. The information collected in the form cover gaps that HUD's financial system of record the Line of Credit Control System (eLOCCS) do not include. These gaps include the PHA's description for use of funds and, the PHA's cash on hand and unliquidated obligations for the grant. PHAs can include supporting documentation to demonstrate that the funds were applied to eligible uses and obligated within the period of performance.

The Public Housing Grants Support for Payment Vouchers supports the PHA's eLOCCS voucher. In the form, the PHA describes the purpose of the expenditure and certifies the expense incurred in the grant's period of performance and the funds requested are required for immediate cash needs. HUD reviews forms before approving the PHA's voucher in eLOCCS. The form is HUDs audit trail that the PHA's drawdown of grant funds are used for their grants directed purpose.

The SF-425 requires the PHA to report grant receipts, disbursements, cash on hand, any unliquidated obligations and unobligated funds. HUD uses this information to determine if the PHA must return cash on hand back to the grant in eLOCCS, as directed by the cash management requirements pursuant 2 CFR Part 200. HUD uses this information to track the PHA's obligation and expenditure of grant funds, and recapture any funds unobligated after the grant's period of performance and any unexpended funds after the grant's end date.

2. HUD requests PHAs to provide support to HUD to approve the PHA's vouchers in eLOCCS for certain Operating Fund and Public Housing Grants. PHAs provide this support through web-based forms called the Public Housing Grants Support for Payment Vouchers form. The form requires PHAs describe how the funds are applied for eligible uses and obligated for expenses incurred during the grant's period of performance. HUD approves vouchers for eligible use and obligated according to the requirements and guidance HUD sets for the grant. HUD requests the PHA's to complete SF-425 for certain Operating Fund and Public Housing Grants to report to HUD how much unliquidated obligations and unobligated grant funds remain after the period of performance and confirm the PHA has no cash on hand that violates cash management regulations directed by 2 CFR Part 200. PHAs complete the SF-425 by a web-based form. PHAs continue to submit both forms until all grant funds are obligated
3. PHAs use web-based form in the Operating Fund Web Portal to submit data. The forms are prepopulated with much data as possible to assist the PHA complete the from quickly and without errors. PHAs certify the information in the form is accurate by electronic signature.
4. HUD's Public Housing Information Center (PIC) system and eLOCCS provide data elements used in the form. However, PHA's description, justification, and support documentation for the eLOCCS vouchers are not captured in any HUD systems. PHA's cash on hand and unliquidated obligations are not captured in any HUD systems.
5. The information being collected has no significant impact on small businesses or other small entities.

6. PHAs submit the Public Housing Grants Support for Payment Vouchers form when HUD requires the PHA to support their voucher request in eLOCCS. PHAs are provided guidance and notice through PIH notices. Without the information provided in the forms, HUD cannot confidently ensure certain Operating Fund grants are obligated for eligible uses, with the period of performance, or to cover recently invoiced expenses. PHAs submit the SF-425 for HUD to track the amount of grant funds obligated but unliquidated or grant funds kept as cash on hand. HUD systems do not track these data points. These data points help HUD ensure that it does not de-obligate funds the PHA set aside for eligible commitments and that the PHA is not holding on to cash in violation of the cash management regulations directed by 2 CFR Part 200.
7. There are no special circumstances that require the collection to be conducted in a manner that is inconsistent with the guidelines in 5 CFR 1320.6.
8. 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 25514. No comments were received.
9. No payments or gifts to respondents are provided.
10. No assurance of confidentiality is needed nor are any provided.
11. No sensitive questions are being asked.
12. This will be a web-based forms. The estimated burden hours for the collection of this data reflects the PHAs' experience with navigating the Operating Fund Web Portal, which HUD uses to host the form. HUD prepopulates the form, and PHAs maintain the requested information as part of their operations and policies. HUD estimates that the information collection requirements for this collection averages 0.5 hours per form (30 minutes) for the Support for Payment Voucher Form and 0.25 hours per form (15 minutes) for the SF-425. HUD expects to require 600 PHAs to complete this form and submit no more than 10 forms per PHA in a calendar year. Operating Fund grants and supplementing Operating Fund grants are distributed on a calendar year basis. HUD expect that 600 PHA will participate or still have unobligated supplemental grant funds in a given calendar year. HUD for each of the approximately 6,000 vouchers submitted in eLOCCS, for a total of 3,000 burden hours. The estimated response time includes the time to complete the form and any recordkeeping burden.

Total Estimated Annual Burden Hours			
Number of Respondents	Frequency of Response	Estimated Hours	Total Annual Burden Hours
600	6000	0.75	4500

The estimated annualized cost to respondents is based on the 2022 general pay schedule for a GS-11, Step 1, rate for Washington-Baltimore-Arlington, DC-MD-WV-PA (an average salary for a financial analyst) that is \$35.91 per hour.

Total Estimated Annual Costs to Respondents					
Number of Respondents	Total Burden Hours	X	Hourly Rate	=	Annualized Cost
600	4500		\$35.91		\$161,595

13. There will be no additional costs to the respondents.

14. The estimated annualized cost to the federal government is based on the 2022 general pay schedule for a GS-11, Step 1 rate for Washington-Baltimore-Arlington, DC-MD-WV-PA (an average salary for a financial analyst) that is \$35.91 per hour. It is estimated that it takes approximately 30 minutes to review the Support for Payment Voucher form and 10 minutes to review the SF-425.

Total Estimated Annual Costs to the Federal Government					
No. of Responses	Burden Hours	X	Hr. Rate	=	Annual Cost
6000	4000		\$35.91		\$143,640

15. The total burden hours increased for respondents increased by 1,500 hours because the previous PRA did not include the burden hours for the SF-425. The burden hours for the Federal government increased by 1,000 hours because of the previous PRA did not include the burden hours for the SF-425.
16. The information collection will not be published.
17. HUD is not seeking approval to omit the expiration date of the OMB approval in the form. The form will display the OMB number and expiration date after OMB approval.
18. There are no exceptions to item 19 of the OMB 83-I.

B. Collections of Information Employing Statistical Methods

There are no collections of information employing statistical methods.