

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification

1. **Why is this 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/authorizing the collection of information.**

This Paperwork Reduction Act submission describes the addition to this collection, the Form HUD-50058.

The Office of Public and Indian Housing of the Department of Housing and Urban Development (HUD) provides funding to Public Housing Agencies (PHAs) to administer assisted housing programs. The Form HUD-50058, Form HUD-50058 MTW Family Report, and Form HUD-50058 MTW Expansion Family Report solicit demographic, family profile, income and housing information on the entire nationwide population of tenants residing in assisted housing. This information allows HUD to monitor and evaluate its programs as required under the following:

- The United States Housing Act of 1937 (42 U.S.C 1437 et seq.)
- Housing and Community Development Act of 1987 (42 U.S.C. 3543(a) – authorizes PHAs to collect social security data)
- Title VI of the Civil Rights Act of 1964 (42 U. S. C. 2000d);
- The Fair Housing Act (42 U. S. C. 3601-19)
- Quality Housing and Work Responsibility Act of 1998 (Public Law 105-276 Title V)
- Housing Opportunity Through Modernization Act of 2016 (Public Law 114-201, 130 Stat. 782)
- HUD Appropriations Act of 1996 (Public Law 104-134 Section 204)
- “Electronic Transmission of Required Family Data for Public Housing, Indian Housing, and the Section 8 Rental Certificate, Rental Voucher, and Moderate Rehabilitation Programs” (24 CFR Part 908)
- 24 CFR Part 5 (5.210 through 5.240)

The Form 50058, Form 50058-MTW, and Form 50058-MTW Expansion provide information about program participants at the time of an action that can affect program participation and rental subsidy calculation. Actions include admittance to the program, annual reexamination of income, change of unit, and end of program participation.

For all household members, the Form 50058, Form 50058-MTW, and Form 50058-MTW Expansion collects name, address, social security number, ethnicity, race, citizenship, gender, assets, income, and expected income. Additional data is collected on employment status, assistance received under other federal assistance programs (TANF, Medicaid, etc.). For head of households, benefits such as health insurance provided by employers is provided for households participating in the Family Self-Sufficiency (FSS) and/or MTW Self-Sufficiency program. Finally, the form also shows the Total Tenant Payment each household contributes towards rent, and other information about rental subsidy calculations.

This version of the forms contains updates required via the Housing Opportunity Through Modernization Act of 2016 (HOTMA). These changes include the addition of data fields for hardship exemptions, permissible deductions, and reporting of over-income families. Also, updates will be made to thresholds for deductions, income, assets and expenses to comport with HOTMA.

This is an expedited PRA request due to the forthcoming implementation of HOTMA on January 1, 2023. While HUD has been diligently negotiating and developing a rule to implement the subsections of HOTMA since its passage, the systematic requirements of Section 102, 103, and 104 have only recently become finalized within the department so that IT development can begin. In order to properly input the data points necessary to implement the HOTMA changes into

Signature of Senior Officer or Designee:

Date:

X
Colette Pollard, Departmental Reports Management Officer,
Office of the Chief Information Officer

HUD and PHA systems, this PRA package is required and in an expedited manner. IT vendors and PHAs will need to make corresponding changes in their software and internal systems in preparation for their submission on January 1, 2023. The changes in this package focus exclusively on HOTMA.

2. **How is the information collected and how is the information to be used?**

This information is collected from participants in the Office of Public and Indian Housing's public housing and housing choice voucher (HCV programs). It is collected from program participants by Public Housing Agencies (PHAs), who in turn submit the data to HUD using form HUD-50058, Form 50058-MTW, and Form 50058-MTW Expansion. PHAs are typically chartered independent entities established by the state legislature to administer affordable housing programs in a jurisdiction. Some are units of local government.

The information is collected from tenants at any time there is a change in circumstances or an action that can affect the calculation of rental subsidy to a participating household. This includes annual reexaminations of households to determine if there have been any changes to households that can affect participation in the program or rental subsidy calculation. This information is collected from residents in a variety of formats. PHAs typically hold face-to-face interviews with adult household members to discuss any changes of circumstances or actions. This information is then used by PHA staff to fill out the Form HUD-50058, Form HUD-50058 MTW, or HUD-50058 MTW Expansion. Some PHAs allow program participants to provide the information to PHA staff via telephone or written communication; however, this is a matter of PHA policy.

PHAs are required to submit any revised HUD-50058s, 50058-MTWs, 50058-MTW Expansion forms for each household annually.

This information is utilized for the subsequent purposes:

- Analyze assisted housing programs;
- Determine the occupancy level of public housing and calculate the operating subsidy in accordance with 24 CFR 990;
- Permit PHAs to monitor their own reporting to identify favorable and unfavorable trends;
- Monitor PHAs and participants for compliance with program regulations and requirements;
- Fraud detection and prevention via rent/income monitoring;
- Housing inventory and development of program initiatives with emphasis on the housing of special needs groups; and
- Make available accurate demographic information depicting tenant characteristics to Congress and other interested parties (however this data is typically scrubbed of any personally identifiable information).

Occasionally, this data is used for research purposes, such as modeling the effect of proposed rent reforms. Research may be conducted by research firms under contract to HUD. However, this data is always scrubbed of personally identifiable information such as social security numbers and names before it is used for this purpose, and all procedures for handling of confidential information, such as restricted access by contractors and secure facilities, are followed.

3. **Describe whether, and to what extent, the collection of information is automated (item 13b1 of OMB form 83-i). If it's not automated, explain why not. Also describe any other efforts to reduce burden.**

Several vendors offer Housing Agency management software, including creation/submission of 50058s. HUD offers a free software program called Family Reporting Software (FRS) to all PHAs. Data collected via Form HUD-50058, Form HUD-50058 MTW, and Form HUD-50058 MTW Expansion Family Reports is electronically submitted by the PHAs into the PIH Information Center (IMS/PIC) on a monthly basis. IMS/PIC is an automated database system which exchanges this data, between Housing Authorities and Local HUD Offices. This data repository is also accessible to HUD Headquarters and field offices.

Estimated to start in 2022, the IMS/PIC Modernization system will begin to store data from the Family Report, MTW Expansion Family Report, and MTW Family Report. The IMS/PIC Modernization system will connect to external partner systems, which includes Public Housing Agency (PHA) systems, in order to transmit data between the two systems. A Memorandum of Understanding (MOU) / Interconnection Security Agreement (ISA) will be required for these system connections, with the purpose of establishing a management agreement regarding the development, management, operation, and security of the connection between the IMS/PIC Modernization system and the connecting system.

The MOU/ISA for the system connection will have no significant impact on information collection burden.

4. Is this information collected elsewhere? If so, why cannot any similar information already available be used or modified.

Tenant Characteristics directly impact the amount of subsidy for which a household is eligible under HUD's programs. HUD's eligibility requirements are distinct from any other federal program requirements, such as TANF, WIC, or SNAPs. Different programs use distinct household composition data to determine program eligibility. Therefore, while program participants may be reporting some of this information to other federal agencies, they are not reporting all this data and it cannot be obtained through any other agency. Further, HUD requires a participant's social security number to verify tenant income, which affects rental subsidy calculation. This is necessary to ensure that the maximum number of families can be served in the public housing and housing choice voucher programs.

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 has no impact on small businesses or other small entities.

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.**

Failure to collect this data at least annually would impede HUD's ability to provide accurate subsidy to PHAs, create effective program polices, measure the impact of these program policies and funding, and provide accurate information to OMB, Congress and the public.

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;

Although public housing agencies are only required to submit data annually for each participating household, families move into and out of subsidized units throughout the year. Therefore, the agencies complete Form HUD-50058, Form HUD-50058 MTW, and Form HUD-50058 MTW Expansion Family Reports for individual families at different times during the year. HUD requires all agencies to electronically submit the forms that they have completed to HUD at least monthly. The Department received OMB approval on September 6, 2006, to require PHAs with less than 100 units to submit Form HUD-50058, Form HUD-50058 MTW, and Form HUD-50058 MTW Expansion Family Reports data monthly as opposed to quarterly.

- 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.**

For the Form HUD-50058, Form HUD-50058 MTW, and Form HUD-50058 MTW Expansion, HUD published a Notice of Proposed Information Collection for Public Comments in the *Federal Register*, Volume XX; Number XX; Page XXXX, dated [insert date]. The public was given until [insert date], to submit comments on the proposed information collection. HUD received [insert info on comments] on this proposed collection.

- 9. Explain any payments or gifts to respondents, other than remuneration of contractors or grantees.**

No payment or gift will be granted to the respondents.

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

In accordance with the Federal Privacy Act of 1974, 5 U.S.C. 552a, public housing agencies must inform applicants and resident families about possible Federal Government uses of information contained on Form HUD-50058, Form HUD-50058 MTW, and Form HUD-50058 MTW Expansion Family Reports and the systems to monitor reductions in subsidy payment errors. Form HUD-9886 *Authorization for the Release of Information/Privacy Act Notice*, is used to inform residents of the authority for the collection of information, the purpose of the data collection, and the uses of the information collected by the PHAs pursuant to the agencies' obligation to submit information to HUD. Tenants give consent for the collection and use of information by signing Form HUD-9886.

Access to the collection of 50058 information is highly restricted. HUD staff seeking access must request access through HUD's Digital Identity and Access Management System (DIAMS) and be approved for such access by their immediate supervisor. The request must be specific as to the nature of the access (view only, submissions, etc.) to ensure integrity. PHA access must be requested through the agency's respective field office. Access is time-limited and must be renewed periodically.

Demographic data provided to Congress and other interested parties is scrubbed of any personally identifiable information. In instances where research may be conducted by research firms under contract to HUD, this data is scrubbed of personally identifiable information and all procedures for handling of confidential information, such as restricted access by contractors and secure facilities, are followed.

- 11. Justify any questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private**

Form HUD-50058, Form HUD-50058 MTW, and Form HUD-50058 MTW Expansion Family Reports does not collect information of a sensitive nature such as sexual behavior and attitudes or religious beliefs. Private information such as income, social security numbers and public benefits, however, is required. This information is required for proper administration of the assisted housing programs and for monitoring program performance. This information is used to determine the amount of subsidy for which each participant household is eligible. Without this information, HUD and PHAs cannot determine program eligibility and the amount of federal subsidy each PHA is to receive in order to continue to operate the public housing and housing choice voucher programs. Please refer to section ten for steps taken to attain the consent of residents to collect such information.

12. **Estimate public burden: number of respondents, frequency of response, annual hour burden. Read the complete instructions on the form 83i. Explain how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices. Provide a table to describe the elements of the burden. Break out each form used.**
- if this collection uses more than one form, provide separate estimates for each form and aggregate the hour burdens in item 13 of OMB Form 83i; and
 - 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.

Summary:

Estimate of the Hour Burden of the Collection of Information	
Number of responses	2,933,713.00
Frequency of Response	Annually
Annual Hour Burden	1,104,087.33
Estimated Annual Cost to Respondents	\$19,321,528.33

It takes approximately 40 minutes for PHA staff to collect and input new admission data into each Form HUD-50058, Form HUD-50058 MTW, and Form HUD-50058 MTW Expansion Family Reports record. Only a portion of the data fields are filled out at each time the form is completed. The fields that are filled are dependent upon the action type or reason for the form's completion. After the initial year of the forms' use, the action type for the form will be recertification rather than new submission. The time it takes to complete a recertification is approximately half that of a new submission. Pre-entry of key information from the previous year is responsible for this time reduction.

Through consultation with financial experts in HUD-HHQ Office Field Operations, an amount of \$17.50 has been approximated to represent the national average as well as the average of the hourly rate for a clerical data entry as well as quality control on the entries.

Detailed:

Information Collection	Number of Respondents (PHAs with Responses)	*Average Number of Responses per Respondent	Total Annual Responses	Burden Hours per Response	Total Hours	Hourly Cost	Total Annual Cost
Form HUD-50058 New Admission	4,014	87	349,218.00	0.66667	232,812.00	\$17.50	\$4,074,210.00
Form HUD-50058 Recertification	4,014	583	2,340,162.00	0.33333	780,054.00	\$17.50	\$13,650,945.00
Form HUD-50058 MTW New Admission	39	529	20,631.00	0.66667	13,754.00	\$17.50	\$240,695.00
Form HUD-50058 MTW Recertification	39	4,018	156,702.00	0.33333	52,234.00	\$17.50	\$914,095.00
Form HUD-50058 MTW Expansion New Admission	100	87	8,700.00	0.66667	5,800.00	\$17.50	\$101,500.00

Form HUD-50058 MTW Expansion Recertification	100	583	58,300.00	0.33333	19,433.33	\$17.50	\$340,083.33
Totals	4,153		2,933,713.00		1,104,087.33		19,321,528.33

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

Estimated annualized hourly cost to respondents (PHA); Form HUD-50058: To report using Form HUD-50058 Family Report, it will cost the average PHA \$1,015.00 annually to enter and submit all data for New Admission and \$3,400.83 annually for Recertification.

- Total Cost for all PHAs; Form HUD-50058 Family Report New Admissions =
 - o 232,812.00 Total Hours X \$17.50/hour = \$4,074,210.00
- Cost per PHA = \$4,074,210.00 Total cost for all PHAs ÷ 4,014 PHAs (with responses) = \$1,015.00 per PHA annually
- Total Cost for all PHAs; Form HUD -50058 Family Report Recertification =
 - o 780,054.00 Total Hours X \$17.50/hour = \$13,650,945.00
- Cost per PHA = \$13,650,945.00 Total cost for all PHAs ÷ 4,014 PHAs (with responses) = \$3,400.83 per PHA annually

Estimated annualized hourly cost to respondents (PHA); Form HUD-50058 MTW: To report using Form HUD-50058 MTW Family Report, it will cost the average PHA \$6,171.67 annually to enter and submit all data for New Admissions and \$23,438.33 annually for Recertification.

The annual burden is calculated by determining the following:

- Total Cost for all PHAs; Form HUD-50058 MTW Family Report New Admission =
 - o 13,754.00 Total Hours X \$17.50/hour= \$240,695.00
- Cost per PHA = \$240,695.00 Total cost for all PHAs ÷ 39 PHAs (with responses) = \$ 6,171.67 per PHA annually
- Total Cost for all PHAs; Form HUD-50058 MTW Family Report Recertification =
 - o 52,234.00 Total Hours X \$17.50/hour= \$914,095.00
- Cost per PHA = \$914,095.00 Total cost for all PHAs ÷ 39 PHAs (with responses) = \$23,438.33 per PHA annually

Estimated annualized hourly cost to respondents (PHA); Form HUD-50058 MTW Expansion: To report using Form HUD-50058 MTW Expansion Family Report, it will cost the average PHA \$1,015.00 annually to enter and submit all data for New Admissions and \$3,400.83 annually for Recertification.

The annual burden is calculated by determining the following:

- Total Cost for all PHAs; Form HUD-50058 MTW Expansion Family Report New Admission =
 - o 5,800.00 Total Hours X \$17.50/hour= \$101,500.00
- Cost per PHA = \$101,500.00 Total cost for all PHAs ÷ 100 PHAs (with responses) = \$1,015.00 per PHA annually
- Total Cost for all PHAs; Form HUD-50058 MTW Expansion Family Report Recertification =
 - o 19,433.33 Total Hours X \$17.50/hour= \$340,083.33
- Cost per PHA = \$340,083.33 Total cost for all PHAs ÷ 100 PHAs (with responses) = \$3,400.83 per PHA annually

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.

Total annual capital and startup cost burden to PHA:

Estimating annual capital and startup cost burdens to PHAs is difficult to determine. Most respondents (PHAs) utilize automated software for the collection, transmission and storage of Form HUD-50058, Form HUD-50058 MTW, and Form HUD-50058 MTW Expansion Family Reports. Several vendors provide software services to PHAs however, the software is used for several day-to-day business functions, not exclusively form reporting.

Additionally, HUD provides all PHAs with free Family Reporting Software (FRS). PHAs can use this software to electronically submit Form HUD-50058 Report data. This software is not used for the Form HUD-50058 MTW and Form HUD-50058 MTW Expansion Family Reports.

Total operation and maintenance of services components:

Estimating the cost to PHAs for the transmission of the Family Reports is difficult to estimate because of the difference in PHA, size, organization structure and administrative capability. A significant cost factor that can be tracked is the time involved to collect the data, fill out the form and electronically submit the data. This information is provided in section 12.

14. Estimate annualized costs to the Federal government.

The estimated annualized cost to the Federal government is \$3,143,000. Based on most recent data available, the total annual cost to maintain HUD's system, which includes the modules for the Form HUD-50058, Form HUD-50058 MTW, and Form HUD-50058 MTW Expansion Family Reports, is \$893,000. The developmental cost is \$1,700,000. The cost to HUD headquarters staff to monitor the system is \$150,000 (5%-6% of contractor cost). HUD estimates that contractors and HUD staff spend 40% of their time on maintenance and monitoring the modules. The annual cost of HUD headquarters staff labor to monitor the module is approximately \$100,000. The annual cost of HUD headquarters staff to maintain the module is \$300,000.

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

The Form HUD-50058 and Form HUD-50058 MTW continues to be submitted in HUD's system in its existing modules. The HUD-50058 MTW Expansion is submitted in the IMS/PIC Modernization system.

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

HUD's systems capture the information from Form HUD-50058, Form HUD-50058 MTW, and Form HUD-50058 MTW Expansion and creates monthly reports such as the Resident Characteristics Report which is available to the public on the HUD website. It provides demographic and income statistics about tenant families that participate in the Housing Programs.

17. Explain any request to not display the expiration date.

Not applicable. HUD will display the OMB control number and expiration date on the form.

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

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methods.