

Supporting Statement for Paperwork Reduction Act Submission

OMB Title: Section 8 Renewal Policy Guidebook

OMB Control Number: 2502-0587

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 *Section 8 Renewal Policy Guidebook* explains the various options available under the Multifamily Housing Reform and Affordability Act of 1997 (MAHRA) for the renewal of expiring project-based section 8 contracts. The requirements associated with such renewals and related administrative policies make this collection of information necessary. There are six options, summarized below, each with its own eligibility requirements, among which an owner may choose, provided the contract is eligible. The renewal process results in issuance of a renewal contract that implements the statutory requirements relative to each of the six renewal options, which consist of the following:

- Option One (Mark-Up-To-Market). Option One consists of Option One-A (Entitlement Mark-Up-to-Market) and Option One-B (Discretionary Mark-Up-to-Market), which are authorized under section 524(a)(4)(A) and section 524(a)(4)(C) of MAHRA, respectively. For eligible contracts, renewal rents are established at market level under a renewal contract with a minimum five-year term.
- Option Two (Contract Renewal for Other Projects with Current Rents at or Below Comparable Market Rents). Option Two is authorized under section 524(a)(4)(C) of MAHRA. For eligible contracts, renewal rents are adjusted by an operating cost adjustment factor or on the basis of a budget and are limited by the market level.
- Option Three (Referral to the Office of Recapitalization (Recap)). Option Three is authorized under sections 514 and 515 of MAHRA. Projects subject to an FHA-insured or HUD-held mortgage for which the rents exceed the level of comparable market rents are eligible for Mark-to-Market (M2M) debt-restructuring, which is administered by Recap. An owner must submit a form HUD-9624 specifying either Option 3A (Reduction of Section 8 Rents to Comparable Market Rents without Restructuring (Lite)) or an Option 3B (Restructure of the Mortgage and Reduction of Section 8 Rents to Comparable Market Rents (Full)). An Option 3A election must include an RCS. An owner may be issued an interim M2M HAP Contract (form HUD-9640 or form HUD-9641) at the current above-market rents for up to 1 year while their renewal request is being processed.
- Option Four (Renewal of Contracts for Exception Projects). Option Four is authorized under section 524(b)(1) of MAHRA. A project may establish eligibility for renewal under Option Four on the basis that (1) it is exempt from M2M debt-restructuring pursuant to section 515(h) of MAHRA or (2) it does not satisfy the definition of “eligible multifamily housing project” in section 512(2). Renewal rents are the lesser of existing rents as multiplied by the operating cost adjustment factor or budget-based rents without any market limitation.

- e. Option Five (Renewal of Portfolio Reengineering Demonstration or Preservation Projects). Option Five is authorized under section 524(e)(1) (Preservation Projects) and section 524(e)(2) (Demonstration Projects) of MAHRA. Owners requesting a renewal of a Portfolio Reengineering Demonstration or Preservation Project must indicate on the form HUD-9624 whether the project has had either a mortgage restructuring and/or had the rents reduced to market. If the project is a Preservation Project as defined by the Low-Income Housing Preservation and Resident Homeownership Act (LIHPRHA) or the Emergency Low Income Housing Preservation Homeownership Act (ELIHPA), the Owner must indicate such on the Contract Renewal Request form (form HUD-9624).
 - f. Option Six (Opt-Out). Instead of requesting renewal of a section 8 contract when it expires, an owner may opt out of the Section 8 program by complying with the notice requirement in section 8(c)(8) of the United States Housing Act of 1937 and with related requirements in Chapter Eleven.
- 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. (Please be sure your response in this section addresses all the questions for this area.)**
- a. Housing Assistance Payments Contract (HUD-52522a; HUD-52522b). These forms are Part I and Part II, respectively, of the HAP Contract that is used to renew a HAP Contract following a transfer of budget authority pursuant to Section 8(bb)(1) of the Act.
 - b. Assignment, Assumption, and Amendment of Section 8 Housing Assistance Payments Contract (HUD-5988). This form is used when a project assisted under a HAP contract is sold. It is used to transfer the HAP contract obligations from the Seller to the Buyer.
 - c. Use Agreement (HUD-90055). This Use Agreement requires the Owner, in exchange for increased rents to pay for repairs, to agree to maintain the project as affordable housing for 20 years.
 - d. Rent Comparability Grid (HUD-92273-S8). This form is used to determine HAP Contract rents via means of a Rent Comparability Study.
 - e. Project-Based Section 8 Housing Assistance Payments Addendum to Renewal Contract under Option One or Option Two for Capital Repairs and/or Acquisition Costs (HUD-93181). This addendum establishes the “As-Is” and “Post-Rehab” rents for a HAP Contract renewed under the Chapter 15 Capital Repairs Program.
 - f. Project-Based Section 8 Housing Assistance Payments Addendum to Renewal Contract under Option One or Option Two for Capital Repairs and/or Acquisition: Post-Rehabilitation Rents at Closing (HUD-93182). This addendum establishes the Pre-Rehabilitation and the Post-Rehabilitation rents for Capital Repairs and/or Acquisition for a contract renewed under Chapter Fifteen with Post-Rehabilitation rents at closing.

- g. Rider to Original Section 8 Housing Assistance Payments Contract (HUD–93184). This rider effectuates the early termination of an original Section 8 contract so that the Owner may request renewal under MAHRA.
- h. Amendment to Project-Based Section 8 Housing Assistance Contract Pursuant to Section 8(bb)(1) of the United States Housing Act of 1937 (HUD–93185a; HUD–93185b). These forms amend Contracts A1 and B, respectively, as referred to in Notice H–2014–14.
- i. Contract Renewal Request Form (HUD–9624). This form is used by an Owner to submit a request for renewal of the project’s Section 8 contract. It identifies which option is being requested and contains a worksheet for each option; the worksheet corresponding to the option selected must be completed by the Owner.
- j. OCAF Rent Adjustment Worksheet (HUD–9625). This form must be completed to calculate the amount of the OCAF rent adjustment for projects eligible for this type of rent adjustment.
- k. Letter to Owners/Agents (HUD–9626). This form is completed by the Contract Administrator and sent to the Owner of a project eligible for an OCAF rent increase under Option One or Option Three.
- l. Letter to Owners/Agents (HUD–9627). This form is completed by the Contract Administrator and sent to the Owner of a project eligible for a budget-based rent increase or an OCAF rent increase under Option Two or Option Four.
- m. Request to Renew Using Non–Section 8 Units in the Section 8 Project as a Market Rent Ceiling (HUD–9629). This form is used by an Owner who requests to renew under Option 2 using non–Section 8 units in the project as a market rent ceiling in lieu of obtaining a Rent Comparability Study.
- n. Request to Renew Using Fair Market Rents (FMRs) as Market Ceiling (HUD–9630). This form is used by an Owner who requests to renew under Option 2 using 75 percent of the Fair Market Rent (FMR) as a market rent ceiling in lieu of obtaining a Rent Comparability Study.
- o. Sample Use Agreement (HUD–9634). This Use Agreement is employed when a for-profit owner transfers a project to a not-for-profit owner and rents are marked up to market or when a not-for-profit owner receives a budget-based rent increase for capital repairs.
- p. Projects Preparing a Budget-Based Rent Increase (HUD–9635). This form is used by an Owner to calculate the initial Owner equity in the project when preparing a request for a budget-based rent increase.
- q. Project-Based Section 8 Housing Assistance Payments Basic Renewal Contract (HUD–9636). This form is the Section 8 contract that is used to renew a HAP contract for a 1-year term.
- r. Project-Based Section 8 Housing Assistance Payments Basic Renewal Contract (HUD–9637). This form is the Section 8 contract that is used to renew a HAP contract for a term of 2 or more years.

- s. Project-Based Section 8 Housing Assistance Payments Renewal Contract for Mark-Up-to-Market Project (HUD-9638). This form is the Section 8 contract that is used when project rents are being marked-up-to-market.
- t. Project-Based Section 8 Housing Assistance Payments Preservation Renewal Contract (HUD-9639). This form is the Section 8 contract that is used for a Preservation project, under which an Owner receives rent benefits comparable to those provided under the Plan of Action in accordance with section 524(e)(1) of MAHRA.
- u. Project-Based Section 8 Housing Assistance Payments Interim (Full) Mark-to-Market Renewal Contract (HUD-9640). This form is the Section 8 contract that is used for a project that is eligible for Mark-to-Market where debt restructuring is necessary. The renewal contract constitutes a binding commitment for purposes of Section 579(b) of MAHRA.
- v. Project-Based Section 8 Housing Assistance Payments Interim (Lite) Mark-to-Market Renewal Contract (HUD-9641). This form is the Section 8 contract that is used for a project that is eligible for Mark-to-Market where the project will be viable without debt restructuring. The renewal contract constitutes a binding commitment for purposes of Section 579(b) of MAHRA.
- w. Project-Based Section 8 Housing Assistance Payments Full Mark-to-Market Renewal Contract (HUD-9642). This form is the Section 8 contract that is used for a project where the debt has been restructured.
- x. Project-Based Section 8 Housing Assistance Payments Watch List Renewal Contract (HUD-9643). This form is the Section 8 contract that is used for a project that initially entered into an interim contract (HUD-9641 or HUD-9642) but later elects not to restructure the debt.
- y. Project-Based Section 8 Housing Assistance Payments Contract for Previous Mod Rehab Projects (HUD-9644). This form is the Section 8 contract that is used for a project formerly assisted under the Section 8 Moderate Rehabilitation program.
- z. Housing Assistance Payments Program Housing Finance & Development Agencies Extension Amendment to Old Regulation State Agency Housing Assistance Payments Contract (HUD-9647). This form of Extension Amendment is used to extend the maximum total contract term of a HAP Contract originally entered by a Housing Finance Agency (HFA) and a Section 8 Owner to the date of the originally scheduled maturity date on the HFA permanent financing.
- aa. Project-Based Section 8 Contract Administration Consent to Assignment of HAP Contract as Security for Freddie Mac Financing (HUD-9648a). This form is used when the Owner of a project wishes to grant a security interest in a HAP Contract to a lender as security for a loan made by the lender to the Owner of the project, when the lender will assign the loan to Freddie Mac.
- bb. Project-Based Section 8 Contract Administration Consent to Assignment of HAP Contract to FNMA as Security for FNMA Credit Enhancement (HUD-9648d). This form is used when the Owner of a project wishes to grant a security interest

in a HAP Contract to FNMA, as security for the obligations of the Owner to FNMA, when FNMA provides a credit enhancement to the Owner for the project.

- cc. Project-Based Section 8 Contract Administration Consent to Assignment of HAP Contract as Security for Financing (HUD-9649). This form is used when the Owner of a project wishes to grant a security interest in a HAP Contract to a lender as security for a loan made by the lender to the Owner with respect to the project.
- dd. Consent to Assignment of Senior Preservation Rental Assistance Contract (SPRAC) as Security for Financing (HUD-9649a). This form is used when the Owner of a project wishes to grant a security interest in a SPRAC to a lender as security for a loan made by the lender to the Owner with respect to the project.
- ee. Project-Based Section 8 Contract Administration Consent to Assignment of HAP Contract as Security for FNMA Financing (HUD-9651). This form is used when the Owner of a project wishes to grant a security interest in a HAP Contract to a lender as security for a loan made by the lender to the Owner of the project, when the lender will assign the loan to Fannie Mae.

Note that the following forms, which are covered under other information collections, are used in the Section 8 renewal process:

- OMB Control Number 2502-0012: HUD-92458 (Rent Schedule: Low Rent Housing)
- OMB Control Number 2502-0029: HUD-92273 (Estimates of Market Rent by Comparison)
- OMB Control Number 2502-0324: HUD-92547-A (Budget Worksheet: Income and Expense Projections)
- OMB Control Number 2502-0598: HUD-91712M (Residual Receipts Note (Limited Dividend Borrowers))

As the burdens associated with completing these forms are accounted for in the respective information collections, we have not included these forms in the table below.

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.**

Project Owners submit the information individually on an annual and case-by-case basis. Pursuant to Notice H 2020-10, owners, management agents, and Contract Administrators may complete the forms in electronic format; electronically sign documents; transmit completed forms through electronic means; and store completed forms in electronic files. After forms have been completed, approved, and contain all necessary signatures, HUD staff update the integrated Real Estate Management System (iREMS).

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.**

Documentation is submitted on a transaction-specific basis.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB form 83-I), describe any methods used to minimize burden.

This collection involves, but does not adversely affect, small for-profit and not-for-profit owners of HUD-assisted housing, as use of the forms is required to obtain benefits.

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.

This collection is necessary to assure that contract rents are established, adjusted, and increased in compliance with statute and that HUD's interest in providing for the long-term preservation of affordable housing is protected.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner: (PLEASE ANSWER EACH BULLET SEPARATELY)

a. Requiring respondents to report information to the agency more often than quarterly;

There is no requirement for respondents to report more frequently than quarterly.

b. Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

There is no requirement for respondents to prepare a written response to this collection in fewer than 30 days.

c. Requiring respondents to submit more than an original and two copies of any document;

There is no requirement for respondents to submit more than an original and two copies of any document.

d. Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;

There is no requirement for respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

e. In connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;

No statistical survey is involved in connection with this collection.

f. Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

There is no use of a statistical data classifications with this collection.

g. 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;

No authority established in statute or regulation supports a pledge of confidentiality.

- h. Requiring respondents to submit proprietary trade secrets, 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.

There is no requirement for respondents to submit proprietary trade secrets or other confidential information.

- 8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

In accordance with 5CFR 1320.8(d), this information collection soliciting public comments was announced in the *Federal Register* on **December 6, 2022**, Volume **87**, No. **233**, Pages **74651**. HUD received comments on form HUD-5988; these comments were taken into consideration; the revised form that is published for 30-day comment reflects comments accepted.

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

Respondents will not be provided any payment or gift.

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

HUD may disclose certain information to Federal, State, or local agencies when relevant to civil, criminal, or regulatory investigations and prosecutions. Information collected will not otherwise be disclosed or released outside of HUD, except as required and permitted by law.

- 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.**

No questions of a sensitive nature are included in this collection.

- 12. **Provide estimates of the hour burden of the collection of information.**

Information Collection	Number of Respondents	Total Annual Responses	Burden Hours per Response	Total Annual Burden Hrs.	Hourly Cost to Public	Total Annual Cost to Public
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Housing Assistance Payments Contract (HUD-52522a and b)	20	20	0.50	10	\$39.72	\$397.20
Assignment, Assumption, and Amendment of Section 8 Housing Assistance Payments (HAP) Contract (HUD-5988)	3,555	3,555	0.50	1,778	\$39.72	\$70,602.30
Section 8 Use Agreement (HUD-90055)	75	75	0.50	38	\$39.72	\$1,489.50
Rent Comparability Grid (HUD-92273-S8)	950	950	1.00	950	\$39.72	\$37,734.00
Project-Based Section 8 Housing Assistance Payments: Addendum to Renewal Contract Under Option One or Option Two for Capital Repairs and/or Acquisition Costs (HUD-93181)	50	50	0.50	25	\$39.72	\$993.00
Project-Based Section 8 Housing Assistance Payments: Addendum to Renewal Contract Under Option One or Option Two for Capital Repairs and/or Acquisition — Post-Rehabilitation Rents at Closing (HUD-93182)	150	150	0.50	75	\$39.72	\$2,979.00
Rider to Original Section 8 Housing Assistance Payments Contract (HUD-93184)	20	20	0.50	10	\$39.72	\$397.20
Amendment to Project-Based Section 8 Housing Assistance Payments Contract [Contract A1] Pursuant to Section 8(bb)(1) of the United States Housing Act of 1937 (HUD-93185a)	25	25	0.50	13	\$39.72	\$496.50
Amendment to Project-Based Section 8 Housing Assistance Payments Contract [Contract B] Pursuant to Section 8(bb)(1) of the United States Housing Act of 1937 (HUD-93185b)	25	25	0.50	13	\$39.72	\$496.50
Contract Renewal Request Form (HUD-9624)	2,000	2,000	1.00	2,000	\$39.72	\$79,440.00
OCAF Rent Adjustment Worksheet (HUD-9625)	7,957	7,957	1.00	7,957	\$39.72	\$316,052.04
Letters to Owners/Agents: Option 1 and 3 (HUD-9626)	419	419	0.25	105	\$39.72	\$4,160.67
Letters to Owners/Agents: Option 2 and 4 (HUD-9627)	1,801	1,801	0.25	450	\$39.72	\$17,883.93
Request to Renew Using Non-Section 8 Units in the Section 8 Project as a Market Rent Ceiling (HUD-9629)	10	10	0.50	5	\$39.72	\$198.60
Request to Renew Using FMRs as Market Ceiling (HUD-9630)	88	88	0.50	44	\$39.72	\$1,747.68
Sample Use Agreement (HUD-9634)	55	55	0.50	28	\$39.72	\$1,092.30
Projects Preparing a Budget-Based Rent Increase (HUD-9635)	1,697	1,697	1.00	1,697	\$39.72	\$67,404.84

Housing Assistance Payments Basic Renewal Contract – One-Year Term (HUD–9636)	500	500	0.50	250	\$39.72	\$9,930.00
Housing Assistance Payments Basic Renewal Contract – Multi-Year Term (HUD–9637)	800	800	0.50	400	\$39.72	\$15,888.00
Housing Assistance Payments Renewal Contract for Mark-Up-To-Market Project (HUD–9638)	169	169	0.50	85	\$39.72	\$3,356.34
Housing Assistance Payments Preservation Renewal Contract (HUD–9639)	213	213	0.50	107	\$39.72	\$4,230.18
Housing Assistance Payments Interim (Full) Mark-To-Market Renewal Contract (HUD–9640)	53	53	0.50	27	\$39.72	\$1,052.58
Housing Assistance Payments Interim (Lite) Mark-To-Market Renewal Contract (HUD–9641)	68	68	0.50	34	\$39.72	\$1,350.48
Housing Assistance Payments Full Mark-To-Market Renewal Contract (HUD–9642)	63	63	0.50	32	\$39.72	\$1,251.18
Housing Assistance Payments Watch List Renewal Contract (HUD–9643)	117	117	0.50	59	\$39.72	\$2,323.62
Project-Based Assistance Housing Assistance Payments Contract For Previous Mod Rehab Projects (HUD–9644)	25	25	0.50	13	\$39.72	\$496.50
Housing Assistance Payments Program Housing Finance & Development Agencies Extension Amendment to Old Regulation State Agency Housing Assistance Payments Contract (HUD–9647)	10	10	0.50	5	\$39.72	\$198.60
Consent to Assignment of HAP Contract as Security for Freddie Mac Financing (HUD–9648a)	50	50	0.50	25	\$39.72	\$993.00
Consent to Assignment of HAP Contract to FNMA as Security for FNMA Credit Enhancement (HUD–9648d)	50	50	0.50	25	\$39.72	\$993.00
Consent to Assignment of HAP Contract as Security for Financing (HUD–9649)	600	600	0.50	300	\$39.72	\$11,916.00
Consent to Assignment of Senior Preservation Rental Assistance Contract (SPRAC) as Security for Financing (HUD–9649a)	50	50	1.00	50	\$39.72	\$1,986.00
Consent to Assignment of HAP Contract as Security for FNMA Financing (HUD–9651)	100	100	0.50	50	\$39.72	\$1,986.00
Total	21,765	21,765		16,655		\$661,516.74

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

n/a

14. Provide estimates of annualized costs to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

See table, below. The hourly cost to the government is reflective of the federal fiscal year 2022 hourly rate for a federal employee equivalent to a GS-13, grade 1.

Information Collection	Number of Respondents	Total Annual Responses	Burden Hours per Response	Total Annual Burden Hrs.	Hourly Cost to Government	Total Annual Cost to Government
Housing Assistance Payments Contract (HUD-52522a and b)	20	20	0.50	10	\$51.18	\$511.80
Assignment, Assumption, and Amendment of Section 8 Housing Assistance Payments (HAP) Contract (HUD-5988)	3,555	3,555	0.50	1,778	\$51.18	\$90,972.45
Section 8 Use Agreement (HUD-90055)	75	75	0.50	38	\$51.18	\$1,919.25
Rent Comparability Grid (HUD-92273-S8)	950	950	1.00	950	\$51.18	\$48,621.00
Project-Based Section 8 Housing Assistance Payments: Addendum to Renewal Contract Under Option One or Option Two for Capital Repairs and/or Acquisition Costs (HUD-93181)	50	50	0.50	25	\$51.18	\$1,279.50
Project-Based Section 8 Housing Assistance Payments: Addendum to Renewal Contract Under Option One or Option Two for Capital Repairs and/or Acquisition — Post-Rehabilitation Rents at Closing (HUD-93182)	150	150	0.50	75	\$51.18	\$3,838.50
Rider to Original Section 8 Housing Assistance Payments Contract (HUD-93184)	20	20	0.50	10	\$51.18	\$511.80
Amendment to Project-Based Section 8 Housing Assistance Payments Contract [Contract A1] Pursuant to Section 8(bb)(1) of the United States Housing Act of 1937 (HUD-93185a)	25	25	0.50	13	\$51.18	\$639.75
Amendment to Project-Based Section 8 Housing Assistance Payments Contract [Contract B] Pursuant to Section 8(bb)(1) of the United States Housing Act of 1937 (HUD-93185b)	25	25	0.50	13	\$51.18	\$639.75
Contract Renewal Request Form (HUD-9624)	2,000	2,000	1.00	2,000	\$51.18	\$102,360.00
OCAF Rent Adjustment Worksheet (HUD-9625)	7,957	7,957	1.00	7,957	\$51.18	\$407,239.26
Letters to Owners/Agents: Option 1 and 3 (HUD-9626)	419	419	0.25	105	\$51.18	\$5,361.11

Letters to Owners/Agents: Option 2 and 4 (HUD-9627)	1,801	1,801	0.25	450	\$51.18	\$23,043.80
Request to Renew Using Non-Section 8 Units in the Section 8 Project as a Market Rent Ceiling (HUD-9629)	10	10	0.50	5	\$51.18	\$255.90
Request to Renew Using FMRs as Market Ceiling (HUD-9630)	88	88	0.50	44	\$51.18	\$2,251.92
Sample Use Agreement (HUD-9634)	55	55	0.50	28	\$51.18	\$1,407.45
Projects Preparing a Budget-Based Rent Increase (HUD-9635)	1,697	1,697	1.00	1,697	\$51.18	\$86,852.46
Housing Assistance Payments Basic Renewal Contract – One-Year Term (HUD-9636)	500	500	0.50	250	\$51.18	\$12,795.00
Housing Assistance Payments Basic Renewal Contract – Multi-Year Term (HUD-9637)	800	800	0.50	400	\$51.18	\$20,472.00
Housing Assistance Payments Renewal Contract for Mark-Up-To-Market Project (HUD-9638)	169	169	0.50	85	\$51.18	\$4,324.71
Housing Assistance Payments Preservation Renewal Contract (HUD-9639)	213	213	0.50	107	\$51.18	\$5,450.67
Housing Assistance Payments Interim (Full) Mark-To-Market Renewal Contract (HUD-9640)	53	53	0.50	27	\$51.18	\$1,356.27
Housing Assistance Payments Interim (Lite) Mark-To-Market Renewal Contract (HUD-9641)	68	68	0.50	34	\$51.18	\$1,740.12
Housing Assistance Payments Full Mark-To-Market Renewal Contract (HUD-9642)	63	63	0.50	32	\$51.18	\$1,612.17
Housing Assistance Payments Watch List Renewal Contract (HUD-9643)	117	117	0.50	59	\$51.18	\$2,994.03
Project-Based Assistance Housing Assistance Payments Contract For Previous Mod Rehab Projects (HUD-9644)	25	25	0.50	13	\$51.18	\$639.75
Housing Assistance Payments Program Housing Finance & Development Agencies Extension Amendment to Old Regulation State Agency Housing Assistance Payments Contract (HUD-9647)	10	10	0.50	5	\$51.18	\$255.90
Consent to Assignment of HAP Contract as Security for Freddie Mac Financing (HUD-9648a)	50	50	0.50	25	\$51.18	\$1,279.50
Consent to Assignment of HAP Contract to FNMA as Security for FNMA Credit Enhancement (HUD-9648d)	50	50	0.50	25	\$51.18	\$1,279.50

Consent to Assignment of HAP Contract as Security for Financing (HUD-9649)	600	600	0.50	300	\$51.18	\$15,354.00
Consent to Assignment of Senior Preservation Rental Assistance Contract (SPRAC) as Security for Financing (HUD-9649a)	50	50	1.00	50	\$51.18	\$2,559.00
Consent to Assignment of HAP Contract as Security for FNMA Financing (HUD-9651)	100	100	0.50	50	\$51.18	\$2,559.00
Total	21,765	21,765		16,655		\$852,377.31

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB form 83-I.

This is a reinstatement, with change, of a previously approved collection for which approval has expired. As a result of the changes described below, the number of estimated respondents decreased from 27,384 to 21,765 (a reduction of 5,619), and the annual burden hours decreased from 25,638 to 10,501 (a reduction of 8,983).

The number of estimated respondents and the burden hours changed due to four factors:

- a. Three forms (HUD-5988 (*new*), HUD-93185b; and HUD-9649a) were added to the collection;
- b. One form (HUD-92273-S8) that is used in the Section 8 renewal process but was not previously included in the collection has been added;
- c. Two forms (HUD-9631 and -9632) are obsolete and have been dropped;
- d. The number of respondents and/or the burden hours per response were revised for 21 forms.

The three forms that were added to the collection are:

- Assignment, Assumption, and Amendment of Section 8 Housing Assistance Payments (HAP) Contract (HUD-5988) (*new*): 3,555 respondents/1,778 annual burden hours
- Amendment to Project-Based Section 8 Housing Assistance Payments Contract [Contract B] Pursuant to Section 8(bb)(1) of the United States Housing Act of 1937 (HUD-93185b): 25 respondents/13 annual burden hours
- Consent to Assignment of Senior Preservation Rental Assistance Contract (SPRAC) as Security for Financing (HUD-9649a): 50 respondents/50 annual burden hours

The form that is used in the Section 8 renewal process but was not previously included in the collection and has been added is:

- Rent Comparability Grid (HUD-92273-S8): 950 respondents/950 annual burden hours

The two forms that were dropped from the collection are:

- Owner Notification that it Will Not Renew Contract (HUD–9631): 1,000 respondents/500 annual burden hours; and
- Owner Notification that it Will Renew Contract (HUD–9632): 800 respondents/400 annual burden hours.

The forms where either the number of respondents or the burden hours per response (or both) were revised are as follows:

- Project-Based Section 8 Housing Assistance Payments: Addendum to Renewal Contract Under Option One or Option Two for Capital Repairs and/or Acquisition Costs (HUD–93181): respondents increased from 25 to 50
- Project-Based Section 8 Housing Assistance Payments: Addendum to Renewal Contract Under Option One or Option Two for Capital Repairs and/or Acquisition — Post-Rehabilitation Rents at Closing (HUD–93182): respondents increased from 50 to 150
- Amendment to Project-Based Section 8 Housing Assistance Payments Contract Pursuant to Section 8(bb)(1) of the United States Housing Act of 1937 (HUD–93185)¹: respondents decreased from 60 to 25
- Contract Renewal Request Form (HUD–9624): respondents decreased from 11,428 to 2,000
- Letters to Owners/Agents: Option 1 and 3 (HUD–9626): hours decreased from 0.5 to 0.25
- Letters to Owners/Agents: Options 2 and 4 (HUD–9627): hours decreased from 0.5 to 0.25
- Sample Use Agreement (HUD–9634): hours decreased from 1.0 to 0.5
- Projects Preparing a Budget-Based Rent Increase (HUD–9635): hours decreased from 1.5 to 1.0
- Housing Assistance Payments Basic Renewal Contract — One-Year Term (HUD–9636): respondents decreased from 892 to 500; hours decreased from 0.75 to 0.5
- Housing Assistance Payments Basic Renewal Contract — Multi-Year Term (HUD–9637): respondents increased from 69 to 800; hours decreased from 0.75 to 0.5
- Housing Assistance Payments Renewal Contract for Mark-Up-To-Market Project (HUD–9638): hours decreased from 0.75 to 0.50
- Housing Assistance Payments Preservation Renewal Contract (HUD–9639): hours decreased from 0.75 to 0.5
- Housing Assistance Payments Interim (Full) Mark-to-Market Renewal Contract (HUD–9640): hours decreased from 0.75 to 0.5

¹ This form is now HUD–93185a.

- Housing Assistance Payments Interim (Lite) Mark-to-Market Renewal Contract (HUD-9641): hours decreased from 0.75 to 0.5
- Housing Assistance Payments Full Mark-to-Market Renewal Contract (HUD-9642): hours decreased from 0.75 to 0.5
- Housing Assistance Payments Watch List Renewal Contract (HUD-9643): hours decreased from 0.75 to 0.5
- Project-Based Assistance Housing Assistance Payments Contract For Previous Mod Rehab Projects (HUD-9644): hours decreased from 1.0 to 0.5
- Extension Amendment to Old Regulation State Agency Housing Assistance Payments Contract: HAP Contract Extension to Original Maturity of Permanent Financing (HUD-9647): hours decreased from 1.0 to 0.5
- Consent to Assignment of HAP Contract as Security for Freddie Mac Financing (HUD-9648a): hours decreased from 1.0 to 0.5
- Consent to Assignment of HAP Contract to FNMA as Security for FNMA Credit Enhancement (HUD-9648d): hours decreased from 1.0 to 0.5
- Consent to Assignment of HAP Contract as Security for Financing (HUD-9649): respondents increased from 50 to 600; hours decreased from 1.0 to 0.5
- Consent to Assignment of HAP Contract as Security for FNMA Financing (HUD-9651): respondents increased from 50 to 100; hours decreased from 1.0 to 0.5

Changes to respondents are based on current practices, as are revisions to burden hours.

- 16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Results will not be published.

- 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.**

HUD is not requesting approval to avoid displaying the expiration date.

- 18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB form 83-I.**

There are no exceptions to the certification statement identified in Item 19 on form OMB 83-I, “Certification for Paperwork Reduction Act Submissions.”

B. Collections of Information Employing Statistical Methods

This information collection does not employ statistical methods.