
**Supporting Statement for Paperwork Reduction Act Submissions
2577-0297
Emergency Housing Voucher and Housing Stability Voucher Data Collection**

A. Justification:

1. **Reason for collection.** This is a reinstatement of emergency PRA 2577-0297 which will then be discontinued. The data collected within this PRA has been absorbed by another collection 2577-0282.

The Housing Choice Voucher (HCV) Program was recently appropriated \$43,439,000 for a new homeless voucher program in the Fiscal Year 2021 appropriation (H.R. 133-691 (8)). This new incremental rental voucher assistance has resulted in the creation of a new voucher type – Housing Stability Vouchers. With the appropriation of these funds, the Office of Housing Choice Vouchers is planning to obligate and disburse the funds for Housing Stability Vouchers (HSV) to Public Housing Authorities as quickly as possible. For each new HUD program, it is necessary to have the ability to monitor and track the expenses and lease-up of these new vouchers to ensure utilization and appropriate program oversight. Furthermore, HUD was directed by the Congressional Appropriation that HUD’s Secretary “shall review utilization of the assistance made available...and unutilized voucher assistance that is no longer needed shall be recaptured by the Secretary and reallocated”. Without data regarding the expenses and leasing of these new Housing Stability Vouchers it will be impossible for HUD to follow the congressional directive to recapture and reallocate unused vouchers.

The Housing Choice Voucher (HCV) Program was recently appropriated \$5,000,000,000 for Emergency Housing Vouchers in the American Rescue Plan of 2021 (H.R. 1319 Sec. 4102). This immense infusion of new vouchers to the program will require in-depth transparency and accountability to the American public. With the appropriation of these funds, HUD will need to be able to monitor and track expenditures for this program and ensure utilization. As directed in the bill “if a public housing agency fails to lease its authorized vouchers... the Secretary may revoke and redistribute any unleased vouchers and associated funds, including administrative funds and costs to other public housing agencies.” Furthermore, the bill directs HUD to allocate the vouchers to PHAs within 60 days after its enactment; so, it is imperative that HUD can collect leasing and expenditure data as soon as funds are disbursed.

Authorities for the information collection under this PRA are: **Consolidated Appropriations Act, 2021 (H.R. 133-691), American Rescue Plan of 2021 (H.R. 1319 Sec. 4102) and PIH Notice PIH 2012-21** | Financial Reporting Requirements for the HCV Program Submitted which states (9) PHAs are required to transmit certain leasing and cost data.

2. **Use of information.** The requested information requirements (how, by whom and for what purpose the information is to be used) for the voucher program consists of the following:

Information Collections Required of PHAs

The inclusion of the fields mentioned below will improve the transparency and accountability of two new voucher program – the Housing Stability Voucher program and the Emergency Voucher program.

HUD requires the ability to track the following data points on the Housing Stability Voucher program from participating Public Housing Authorities:

- **Housing Stability Vouchers – Leasing:** Need to capture the UMLs for this new category due to its implementation. This is per Consolidated Appropriations Act 2021.
- **Housing Stability Vouchers – HAP Expenses:** Need to capture the HAP Expenses for this new category due to its implementation. This per Consolidated Appropriations Act 2021.
- **Housing Stability Vouchers - Number of New Vouchers Issued but not Under HAP Contract as of the last day of the month:** Need to capture the number of Housing Stability Vouchers that have been issued as of the last day of the month to assist projecting future leasing of Housing Stability vouchers and assisting in the possible need to recapture and reallocate unused funding.

HUD requires the ability to track the following data points on the Emergency Housing Voucher program from participating Public Housing Authorities:

- **Emergency Housing Vouchers– Leasing:** Need to capture the UMLs for this new category due to its upcoming implementation as a separate appropriation from the Tenant Based Rental Assistance. This is per the COVID Relief Act Sec. 4202.
- **Emergency Housing Vouchers - HAP Expenses:** Need to capture the HAP Expenses for this new to its upcoming implementation as a separate appropriation from the Tenant Based Rental Assistance. This is per the COVID Relief Act Sec. 4202.
- **Emergency Housing Vouchers – Admin Fees – Preliminary Fee Expenses:** Need to capture the amount of administrative expenses used from the PHA’s preliminary fee to support rental assistance for the Emergency Housing vouchers.
- **Emergency Housing Vouchers – Admin Fees – Placement/Issuance Fee Expenses:** Need to capture the amount of administrative expenses used from the PHA’s placement/expedited issuance fee to support rental assistance for the Emergency Housing vouchers.
- **Emergency Housing Vouchers – Admin Fees - Ongoing Administrative Expenses:** Need to capture the amount of ongoing administrative expenses for Emergency Housing vouchers separate from the regular HCV program.
- **Emergency Housing Vouchers – Service Fee – Housing Search Assistance Expenses:** Need to capture the amount of expenses used for housing search assistance to support rental assistance for the Emergency Housing vouchers.
- **Emergency Housing Vouchers – Service Fee – Security/Utility Deposit/Rental Application/Holding Fee Expenses:** Need to capture the amount of expenses used for security deposits to support rental assistance for the Emergency Housing vouchers.
- **Emergency Housing Vouchers – Service Fee - Owner Incentive Expenses:** Need to capture the amount of expenses used for owner recruitment, retention and participation incentives to support rental assistance for the Emergency Housing vouchers.
- **Emergency Housing Vouchers – Service Fee - Other Eligible Expenses:** Need to capture the amount of other expenses used to support rental assistance for the Emergency Housing vouchers such as moving expenses, tenant-readiness services, essential household items, renter’s insurance, etc.
- **Emergency Housing Vouchers - Number of New Vouchers Issued but not Under HAP Contract as of the last day of the month:** Need to capture the number of Emergency Housing vouchers that have been issued as of the last day of the month to assist projecting future leasing of Emergency Housing vouchers and assisting with funding projections.
- **Emergency Housing Vouchers - HAP Expenses After the First of the Month:** Need to capture PHA HAP expenditures after the first of the month to accurately capture total HAP expenses and per unit cost for the newly created Emergency Housing vouchers.
- **Emergency Housing - FSS Escrow Deposits:** Need to capture the amount of Family Self Sufficiency escrow deposits for Emergency Housing vouchers separate from the regular HCV program for tracking, audit, reporting and reconciliation purposes.
- **Emergency Housing Vouchers - FSS Escrow Forfeitures this Month:** Need to capture the amount of Family Self Sufficiency escrow forfeitures for Emergency Housing vouchers separate from the regular HCV program for tracking, audit, reporting and reconciliation purposes.
- **Emergency Housing Vouchers - Fraud Recovery Total Collected this Month:** Need to capture the amount of Fraud Recovery funds collected for Emergency Housing vouchers separate from the regular HCV program for tracking, audit, reporting and reconciliation purposes.
- **Emergency Housing Vouchers - Unrestricted Net Position Funds (UNP) as of the Last Day of the Month:** Need to capture the amount of Unrestricted Net Position Funds for Emergency Housing vouchers separate from the regular HCV program for tracking, audit, reporting and reconciliation purposes. This field will be used to capture up to three different Emergency Housing Voucher types per future appropriations.
- **Emergency Housing Vouchers - Restricted Net Position Funds (RNP) as of the Last Day of the Month:** Need to capture the amount of Restricted Net Position Funds for Emergency Housing vouchers separate from the regular HCV program for tracking, audit, reporting and reconciliation purposes.
- **Emergency Housing Vouchers - Cash/Investment as of the Last Day of the Month:** Need to capture the amount of Cash/Investments for Emergency Housing vouchers separate from the regular HCV program for tracking, audit, reporting and reconciliation purposes.

The data requested above will need to be entered by the PHA on a monthly basis into a HUD system that is yet to be determined.

3. **Describe whether, and to what extent, the collection of information is automated?** Financial Form HUD-52681-B has been automated; submissions are manually keyed to the data entry forms monthly and electronically uploaded to VMS.
4. **Duplication of information.** None. This information is not currently collected at this time in a separate field.
5. **Does the collection of information impact small businesses or other small entities?** No.
6. **Describe the consequences to federal program or policy activities if the collection is not conducted or is conducted less frequently.** The burden associated with collecting this information for the Stability Voucher program and the Emergency Voucher Program is the minimum needed for program monitoring, implementation and allowing for the possibility of recapture and reallocating funds. The information cannot be collected less frequently because it is information necessary for HUD to carry out its budget, allocation, oversight, and cash management functions. Furthermore, without the data on leasing for the Stability Vouchers it would be impossible to recapture and reallocate unutilized vouchers per congressional mandate.
7. **Explain any special circumstances.** PHAs will submit data for each month after the end of said month.
 - 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 date and page number of the Federal Register notice soliciting comments on the information.** Agency notice of proposed information collection was published for public comment in the *Federal Register* on March 24, 2023, Vol 88, No 57, page 17865. A 60-day comment period was provided for both information collections. The Department received no comments.
9. **Explain any payments or gifts to respondents, other than remuneration of contractors or grantees.** No payments or gifts to respondents are provided.
10. **Describe any assurance of confidentiality provided to respondents.** N/A. Information collected does not apply to individuals or any information covered by the Personal Identifiable information covered under the Privacy Act of 1974 (U.S.C. 552.a).
11. **Justify questions of a sensitive nature, such as sexual, religious beliefs and other matters that are commonly considered private.** Not Applicable.
12. **Annual Reporting Burden**

Description	Number of Respondents	Responses per Respondent	Total Annual Responses	Hours per Response	Total Hours	Hourly Costs	Total Annual Costs
Financial Form	700	12	8,400	1	8,400	\$34	\$285,600
Totals	700		8,400		8,400		\$285,600

Estimated annual cost. Estimated hourly cost for response assuming a GS-12, Step 1 (\$71,099), Analyst or Manager, hourly rate is \$34.07 or approximately \$34 per hour. 8,400 hours times average hourly costs of \$34 = \$285,600.

700 PHAs x \$34 per hour for PHA staff members inputting information

13. **Additional cost to respondents.** None

14. **Annualized cost to the Federal Government**

Estimated annualized cost is \$28.42 per hour, based on the 2023 General Pay Scale for a GS-11 Step 1, which represents the HUD field staff reviewing required information.

Federal Government Costs

Requirement Burden Hours	Annual per hour	Cost	Total
Financial Form	8,400	\$28.42	\$238,728
Totals	8,400		\$238,728

15. **Reason for program changes.** N/A

16. **Plans for publication of information collected.** Information will be published to HUD.gov

17. **Approval to not display expiration date for OMB approval.** HUD is not seeking approval to avoid displaying the OMB expiration date.

18. **Exceptions to certification.** N/A

B. Collection of Information Employing Statistical Methods:

Section B is not applicable since statistical methods are not used.

19. Certification for Paperwork Reduction Act Submissions

On behalf of the U.S. Department of Housing and Urban Development, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9.

Note: The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320/8(b)(3) appear at the end of the instructions. The certification is to be made with reference to those regulatory provisions as set forth in the instructions.

The following is a summary of the topics, regarding the proposed collections of information that the certification covers:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities;
- (d) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) It indicates the retention periods for recordkeeping requirements;
- (g) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
 - (i) Why the information is being collected;
 - (ii) Use of the information;
 - (iii) Burden estimate;
 - (iv) Nature of response (voluntary, required for a benefit, or mandatory);
 - (v) Nature and extent of confidentiality; and
 - (vi) Need to display currently valid OMB control number;
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to collected (see note in item 19 of the instructions);
- (i) It uses effective and efficient statistical survey methodology; and
- (j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in item 18 of the Supporting Statement.

Signature of Program Official:

Date:

X Danielle Bastarache, Deputy Assistant Secretary, Office of Public Housing and Voucher Programs, PIH, HUD
