

Proposed PBV Information collection

Attachment to comments from PHADA on Proposed Information Collection: Project Based Vouchers (PBV) Online Form Docket No. FR-7051-N-10

Fields	Notes from HUD definitions	Already Provided to HUD?*	Method of info provision to HUD	Initial comments	Steps PHAs may need to take to gather and enter info	Estimated Number of minutes to complete - Total	Minutes Breakdown
HAP Contract Number	Form HUD 52530 A or B (HAP Contract)	No			Pull HAP contract	5	
Name of Project	Determined by PHA as used in public or property records, or commonly used name.	No		Can cause confusion, multiple names may be in place. "Project" as defined in CFR 983.3(b)	Pull and review HAP contract and possibly other documents; discuss internally which name to use.	10	
Address of Building(s) and Units		Yes	PIC 50058	How will this be entered, if it must include address for each individual unit?	Identify address from HAP or AHAP; confirm for individual units via system search; enter address for each unit.	112	Identify address 2; system search to identify all unit addresses 10; enter address for each unit - 2 minutes per unit. For 50 units 100 minutes
Number of units under AHAP		No		(From AHAP)	Pull AHAP, review, enter numbers.	10	VMS collects totals, not by property
Number of units under HAP Contract by bedroom size		No**		(From HAP)	Enter number	1	VMS collects totals, not by property
Number of Total Units at the Project		No		Including non-contract units	Contact owner or manager, or pull original application documents to identify the total number of units.	15	
Structure Type (Elevator, Mixed, Row or townhouse, Semi-detached, Detached/single family, Walkup/multi-family)	Most closely matching from the list.	Yes	PIC 50058		Enter type selection	1	
Type (Existing, re-hab, new construction)					Enter type selection	1	
Effective Date(s) of AHAP	From AHAP Part 1.4. May include multiple dates for phased projects.	No			Enter info from AHAP	1	Additional time if multi-stage
Effective Date(s) of HAP	From HAP Part 1(d). For multi-stage projects, include dates and units covered in each stage.	No			Enter info from HAP	1	Additional time if multi-stage
Expiration Date	Based on HAP contract term (initial and any extensions)	No		What if HAP contract only has an option to extend and it is not required as under RAD?	Enter info based on HAP	2	Need to calculate end date based on start date and term.
owner Name	From HAP Part 1(a) including contact info.	Yes, but not contact info.	PIC 50058		Enter info from HAP	1	
Owner Tax ID		Yes	PIC 50058		Enter info from HAP	1	
Management Entity	Inc. contact information	No			Review records to identify management entity	2	
PHA Owned, PHA Ownership interest but not PHA owned, No PHA Ownership Interest	Determined based on 24 CFR 983 as amended.	No			Review ownership Entity legal documents and 24 CFR 983 to determine category	1	1 minute assumes no PHA ownership interest. Significantly more if there is a PHA ownership interest to review docs and determine category.
If PHA Owned: Name of Independent Entity or Entities	Entities which perform the following functions consistent with 24 CFR 983: 1. Review the PHAs PBV selection process; 2. Establish PBV contract rents; 3. Determine rent reasonableness; 4. Provide the rent reasonableness determination to the PHA and HUD field office; 5. Establish term of initial and any renewal HAP as per 983.205; 6. Inspect units; 7. Provide a copy of the inspection report to PHA and HUD field office.	No			Pull agreements and other documents to identify the relevant entities, enter information	10	
Other Related Programs (Tax Credit, RAD, HUD-insured, VASH, Other)	Include any HUD special purpose vouchers; and any other federal, state or local assistance including tax credits and other tax incentives.	No			Review original application documents, other agreements, and perhaps contact manager/owner to determine what, if any, other assistance is provided.	15	15 minutes estimate assumes information is included in documents, or manager/owner is available and able to provide information accurately. Tax incentives other than LIHTCs will be especially difficult to identify.
Population Served (General, Homeless, Veterans, Families Eligible for Supportive Services, Families receiving supportive services, Elderly Family, Disabled Family)	Definitions at PIH Notice 2017-21, or CFR 5.403.	No			Review notice if needed, enter result	1	Assumes no review of notice is necessary

Does an Exception to the Income Mixing Requirement Apply?	Y/n, as per 983.56 as amended.	Yes	HUD 50058		Enter result	1	Assumes no review of agreements, procurement, HAP or Regs is needed.
If yes, which exception(s)?	Exception categories from the Regs, and PIH Notice 2017-21.	No			Enter result	1	Assumes exception, if applicable, is known.
Supportive services available (Y/N)?	"If the project has supportive services available to residents so as to qualify for an exception to 24 CFR 983.56.	No		Great risk here that if services are available on or near site, that PHAs will enter Y even if it does not qualify under regs.	Review HAP and/or AHAP, review regs, determine accurate reporting.	5	Assumes some research needed.
Vacancy Payments Permitted (Y/N)?	Y/N, from HUD 52530	No			Review HAP, enter data	1	
Program Cap Exception (Y/N)?	Y/N, as per 983.56 as amended.	Yes and No		The PHA must submit information to HUD on the exception, but the required submission does not require detailed property-level information.	Review procurement or other docs (annual Plan?) to determine if a program cap exception applies.	10	Assumes some research needed.
Program Cap Exception Category	Exception categories from the Regs, and PIH Notice 2017-21.	Yes**			Review regs, notice, project docs, etc. following on previous question.	5	Assumes some research needed, but documents already pulled and review for answer to prior question.
Unique Project building Code ***	***	No					
HAP Contract Code ***	***	No					
Number of RAD PBVs	Number of PBVs that converted under RAD	No*		Badly worded, as PBVs don't convert, but LIPH is converted to PBVs.	Review initial docs, enter number.	2	
Use Restriction End Date	Y/N if HUD use restriction in place; if yes include end date.	No*			Review property documents, perhaps including closing binder, to determine if restriction in place, and the timing of such restriction.	15	Assumes relevant documents must be located, perhaps in another department, and reviewed. Location of such information is not obvious or uniform.
Year Built	Year construction was first completed.	No			For rehab or existing units, may require information from owner or other records, may not be readily available.	10	
Number and Bedroom Distribution of PBV-assisted Section 504 Mobility units at the Project	Units must meet either UFAS, or 2010 ADA standards, as per 'HUD's Deeming Notice' from Fed Register May 23,2014.	No			Review AHAP and HAP and enter number.	5	
Number and Bedroom Distribution of PBV-assisted Section 504 Hearing/Vision Units at the Project		No			Review AHAP and HAP and enter number.	5	
						Estimated Burden Hours	
*** The unique project building code and HAP contract code may be produced by the system or a protocol for numbering may be established by HUD.	** Only units under lease are reported via 50058. VMS record of HAP numbers is aggregate, not property specific.	* Does not consider information provided for environmental, civil rights, or RAD reviews, as this information is not systematically gathered and reported in a database and any aggregation or reporting would be a manual process.			Total Estimated Minutes	250	4.16666667

Rough estimate is that collecting and entering data will take about one half of a normal work day.