Supporting Statement for Paperwork Reduction Act Submissions

Public Housing 5-Year and Annual PHA Plan

2577-0226

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.

   Section 511 of the Quality Housing and Work Responsibility Act (QHWRA) of 1998 (P.L. 105-276, 112 Stat. 2461), enacted
   October 21, 1998 (referred to as the "Public Housing Reform Act") added Section 5A to the U.S. Housing Act of 1937 [42 U.S.C. 1437 et seq; see 1437c-1] that created a requirement that all public housing agencies (PHAs) develop public housing agency plans, consisting of a 5-Year Plan and an Annual Plan. The 5-Year Plan describes the mission of the agency and the agency's long-range goals and objectives for achieving its mission over the subsequent 5 years. The Annual Plan provides details about the agency's immediate operations, program participants, programs and services, and the agency's strategy for handling operational concerns, residents' concerns and needs, programs and services for the upcoming fiscal year.

   Subsequent implementation of the PHA Plan, in accordance with Section 5A [42 U.S.C. 1437c-1(k)], allowed for submission of streamlined plans by high-performing PHAs, small PHAs with less than 250 public housing units that are not designated as troubled, or PHAs that only administer tenant-based Housing Choice Vouchers (HCV) assistance and do not own or operate public housing. Additionally, the Housing and Economic Reform Act (HERA) removed the requirement for qualified PHAs to submit an annual PHA Plan and to only submit the 5-year Plan. A "qualified PHA" is one that manages 550 or fewer public housing units and vouchers and is not labeled as a troubled public housing agency. The previous reinstatement of this collection integrated the Moving to Work (MTW) Supplement to that Annual PHA Plan process for PHAs that joined MTW under the 2016 Appropriations Act (i.e. MTW Expansion). This revision integrates minor edits to form HUD-50075-HCV and the automation of all the forms in this collection.

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.

The PHA Plan ensures that the PHA is accountable to the local community for choices it makes relative to the housing needs of low-income, very low-income, and extremely low-income families. The information is collected from local, regional, or State public housing agencies who receive funds to operate Federal public housing or Section 8 tenant based-assistance (voucher) programs and transmitted to the Department of Housing and Urban Development (HUD), via the Internet for the purpose of providing a comprehensive source document by which the Department, public housing residents, participants in the tenant-based assistance program, and other members of the public, can monitor the basic PHA policies, rules and requirements concerning the PHA's operations, programs and services (24 CFR 903.3). HUD will be automating this collection to reduce burden.

The Moving to Work (MTW) Supplement serves as the reporting mechanism to the Department for the 100 new MTW agencies that will be designated as such pursuant to the Appropriations Act of 2016. The 100 new MTW agencies will not be required to submit the Annual MTW Plan and Annual MTW Report (i.e., HUD Form 50900) that is used for the existing 39 MTW agencies. The MTW Supplement to the Annual PHA Plan informs HUD, families served by the PHA, and members of the public, of the MTW activities that the PHA seeks to implement in the coming fiscal year and an update on the status of MTW activities that have been previously approved. Also provided is Agency-specific waiver request information, data to satisfy MTW statutory requirements, public housing Operating Subsidy grant reporting information, and third-party evaluation information.

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.

   With this current proposed information collection, HUD intends to automate all PHA Plan templates and certifications. While the templates will be automated, the content and required elements will be the same with minor modifications as needed. This decision was made to reduce administrative burden on the PHA but participation in the automated form will be voluntary.

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.

   The information collected in a 5-Year and Annual PHA Plan and MTW Supplement is not collected or duplicated elsewhere as it is developed by each individual PHA to meet their local needs. The 5-Year PHA Plan is a narrative of a PHA's mission, goals, and objectives for serving the needs of low, very-low, and extremely low-income families and needs of child and adult survivors of domestic violence as required by the Violence Against Women Act (VAWA). Annual PHA Plans include an inventory of the PHA's policies and programs set forth in an abbreviated, but comprehensive format.

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.

While 24 CFR Part 903 requires the submission of an Annual PHA Plan by PHAs, additional regulations also account for the need to minimize the submission burden for smaller PHA entities. Public and Indian Housing programs typically define small PHAs as those with less than 250 public housing units and any number of Housing Choice Vouchers (HCV) where the total combined units exceed 550 units. Section 3 [42 U.S.C. 1437a] defines a PHA to mean any State, county, municipality, or other governmental entity or public body (or agency or instrumentality thereof) which is authorized to engage in or assist in the development or operation of public housing. Sections 2701 and 2702 of the Small PHA Paperwork Reduction Act, Title VII of the Housing and Economic Recovery Act (HERA) of 2008, (Public Law 110-289, H.R. 3221) provide Qualified PHAs an exemption from the requirement in Section 5A of the United States Housing Act of 1937, (the Act) to prepare and submit an Annual PHA Plan. A Qualified PHA is defined by HERA as follows:

> A public housing agency meeting the following requirements: (1) the sum of public housing dwelling units administered by the agency and the number of vouchers under Section 8(o) of the Act is 550 units or fewer and (2) the agency is not designated as troubled under section 6(j) (2) and does not have a failing score under the Section Eight Management Assessment Program (SEMAP) during the prior 12 months.

With the passage of HERA and the Small PHA Paperwork Reduction Act, for purposes of PHA Plans, the universe of “small” PHAs is expanded to those that manage 550 or fewer such units. This collection significantly reduces administrative and paperwork burdens and associated costs for Qualified PHAs which represent approximately 72% of the PHAs that administer public housing programs. Section 2702 of HERA exempts Qualified PHAs from the preparation and filing requirements for the PHA Annual Plan, requiring only the submission of the 5-Year PHA Plan once every five years, unless there are any interim changes to the goals, objectives, and policies of the PHA. Qualified PHAs submit only the 5-Year PHA Plan, and Civil Rights certification, establish one or more Resident Advisory Boards (RAB) and consider their comments and recommendations, and conduct an annual public hearing to discuss changes to the goals, objectives, and policies of the agency, even if the PHA does not propose any changes. The currently revised HUD-50075 forms have separate versions to reflect only the submission requirements of various types of PHAs, e.g. standard/troubled, small, high performing, and Section 8 or HCV Only.

Notwithstanding HERA, the existing regulations in 24 CFR sections 903.11 and 903.12 permit the submission of streamlined plans. Therefore, HUD has continued to use multiple versions of the PHA Plan template instead of the previous version of the single form HUD-50075, used by all PHAs. The current versions of the forms contain only those elements required for submission by PHA type, and eliminate the need for PHAs to read through all elements and accompanying instructions to find those that are applicable.

Accordingly, the Annual PHA Plan submission requirements can be divided into two groups: 1) Standard plan formats for larger PHAs and PHAs designated as troubled, and 2) Streamlined plans for high-prefoming, Section 8 only and small PHAs with less than 250 public housing units and any number of vouchers when combined is greater than 550 units (non-HERA eligible). All PHAs will complete and submit the 5-Year PHA Plan template (50075-5Y) and submit it every five years unless there are any interim changes to the goals, objectives, and policies of the PHA. Annually, Standard and Troubled PHAs will complete the standard Annual PHA Plan template 50075-ST, which includes information on all annual plan components, but retains the feature of the previous template allowing PHAs to identify and submit information only on certain elements that have changed since the last annual plan submission and describe new activities planned for the coming year.

Small PHAs with less than 250 public housing units and any number of vouchers, which when combined exceeds 550 units (non-HERA qualified) will submit the streamlined annual plan template, 50075-SM, which requires reporting of fewer annual plan elements when 5-year PHA Plans are also due and permits PHAs to certify and describe which plan elements changed from the previous annual plan submission for all other submission years.

Section 8 or HCV Only PHAs that administer more than 550 vouchers will complete and submit the 5-Year PHA Plan template (50075-5Y) and submit it every five years unless there are any interim changes to the goals, objectives, and policies of the PHA. HCV Only PHAs will also complete the Annual PHA Plan template 50075-HCV, which includes submission of only those annual plan components that are applicable to administration of the Housing Choice Voucher program. In this revision, form HUD 50075-HCV will now allow HCV only PHAs to report on Project Based Voucher (PBV) activities.

High Performer PHAs will complete and submit the 5-Year PHA Plan template (50075-5Y) and submit it every five years unless there are any interim changes to the goals, objectives, and policies of the PHA. Annually, High Performer PHAs will complete the Annual PHA Plan template 50075-HP. Qualified PHAs will complete the 5-Year PHA Plan template (50075-5Y) and submit it every five years unless there are any interim changes to the goals, objectives, and policies of the PHA. Qualified PHAs will also submit each year the Civil Rights Certification (50077-CR) to confirm their compliance with the civil rights and Resident Advisory Board (RAB) consultation requirements. Any PHA that does not qualify for a streamlined plan submission will have to use the Standard Plan form (50075-ST).

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.

   Collection of this information is mandated by statute. Most of the information collected represents an abbreviated and comprehensive inventory of the policies PHAs employ in their management of public housing and Housing Choice Vouchers that are a routine part of the PHAs day-to-day operations.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- 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
- 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.

None of the special circumstances above apply to this information collection. The currently proposed form HUD-50075 has been customized into separate versions for use by various types of PHAs, including high performing, small, standard/troubled, and Section 8 or HCV Only PHAs. It is sumbitted annually so PHAs have several months to prepare it. The automation of the form will not require additional copies and the information provided by the PHA will not contain any personally identifiable information or specialized statistical or proprietary 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 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 preclude consultation in a specific situation. These circumstances should be explained.

   HUD published a Notice of Proposed Information Collection for comments in the Federal Register, Volume 88; No. 239 page 86667, on December 14], 2023. The public was given until Fedrruary 12], 2023, to submit comments. No comments were received.

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

   No payment or gifts to respondents is involved.

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

    The PHA plans and MTW Supplement submitted to HUD are public information and do not lend themselves to confidentiality.

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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

    The PHA plans and the MTW Supplement are not of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:
    - indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally estimates should not include burden hours for customary and usual business practices;
    - if this request covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I; 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.

The estimated burden, based on the number of respondents, frequency of response, and annual burden is summarized in the following table:

	Respondents Annually	**Annual responses (Frequency)**	**Total responses Annually**	**Burden Hours per Response**	**Total Burden Hours**	**Salary***	**Total Burde Cost**
50075-ST Annual Plan TOTALS[†]	**796**	**1**	**796**	**5.64**	**4,498.44**	**$26.62**	**$119.508.89**
Form HUD-50075-SM[†]							
50075-SM Annual Plan in Years 1-4 TOTALS	**202**	**1**	**202**	**1.63**	**327.24**	**$26.62**	**$8,711.13**
50075-SM Annual Plan in 5th Year	**202**	**1**	**202**	**5.26**	**1,062.52**	**$26.62**	**$28,284.28**

TOTALS							
Form 50075-SM Annual Plan ANNUAL TOTALS (5th year/5) +yrs. 1-4 total				**2.67**	**539.74**	**$26.62**	**$14,367.99**
50075-HP Annual Plan TOTALS†	**152**	**1**	**152**	**5.26**	**799.52**	**$26.62**	**$21,283.22**
50075-HCV Annual Plan TOTALS†	**246**	**1**	**246**	**4.52**	**1,111.92**	**$26.62**	**$29,599.31**
Form 50075-MTW MTW Supplement TOTALS†	**100**	**1**	**100**	**6.50**	**650.00**	**$26.62**	**$17,303.00**
Form HUD-50077-CR (Qualified PHAs)	**2,321**	**1**	**2,321**	**0.16**	**371.36**	**$26.62**	**$9,885.60**
Form HUD-50075-5Y†							
Form HUD-50075-5Y All Years TOTALS	**3,763**	**1**	**3,763**	**6.15**	**23,142.45**	**$26.62**	**$616,052.02**
5 Year Plan - TOTALS (All Years divided by 5)	**3,763**	**1**	**3,763**	**1.23**	**4,628.49**	**$26.62**	**$123,210.40**
TOTAL ANNUAL BURDEN ALL FORMS	**3,763**	1	**3,763**	**25.98**	**12,590.47**	**$26.62**	**$335,158**

* The hourly cost for response assumes a GS-9, Step 5 ($55,564), Executive Assistant, hourly rate is $26.62.

† Note: The rows representing the burden for each template/respondent type includes the burden of the relevant annual certification forms (HUD-50077-SL, HUD-50077-CR-SM & HUD-50077- ST-HCV-HP).

Total Annual Burden Hours for all PHAs for all PHA Plan Templates: 12,590.47

Weighted Average Annual Burden Hours all PHAs for Annual Templates only: 5.07 (sum of % of Total PHAs represented by each type of PHA multiplied by annual burden hours for each PHA template type).

Form	Burden Hours by Type of Template	Individual Templates /Total # of Annual Templates	Percent of Total	Applied to Burden Hours	Weighted Average Burden Hours

ST	5.64	769/1496	0.53	.53 x 5.64	3.00
SM	2.67	202/1496	0.14	.14 x 2.67	0.36
HP	5.26	152/1496	0.10	.10 x 5.26	0.53
HCV	4.52	246/1496	0.16	.16 x 4.52	0.74
MTW	6.50	100/1496	0.07	.07 x 6.50	0.43
Total # of Annual Plans		1496	1.00		5.07

Burden hour estimates are based on a total of 3,763 PHAs - 2,321 Qualified PHAs, 796 Standard or Troubled (PHAs with more than 550 public housing units or vouchers combined), 152 High Performers and 202 Small (PHAs with less than 250 public housing units and any number of vouchers that when combined exceeds 550 total units), and 246 Section 8 or HCV Only (PHAs with more than 550 vouchers or with less than 551 vouchers and not SEMAP-Troubled). This data was extracted from HUD's Portfolio & Risk Management Tool (PRMT) on 10-13-2023. The 5-Year Plan is completed once every 5 years by all PHAs. This collection includes 6.5 hours per MTW Supplement which is submitted annually by 100 new MTW agencies that will be designated pursuant to the Appropriations Act of 2016.

The burden hours reflected in the Burden Worksheet and Supporting Statement represent the average annual burden hours for PHAs to prepare and submit Annual and 5-Year PHA Plan templates, and additional certifications and documents as attachments to the PHA Plan based on such factors as the size and designation of the PHA, and the number of programs administered by the PHA. The Qualified PHAs under HERA conduct an annual public meeting and submit the 5-Year PHA Plan once every 5 years. All other PHAs submit the applicable Annual PHA Plan each year, and the 5-Year Plan every 5 years, unless significant interim changes are made, in which case the 5-Year Plan may be submitted with the Annual Plan in the year in which the changes are made.

Revisions are made to this collection to reflect adjustments in calculations based on the total number of current PHAs as of October 13, 2023. The number of active public housing agencies has changed from 3,780 to 3,763 since the last approved information collection. The number of PHAs can fluctuate due to many factors, including but not limited to performance scoring, the merging of two or more PHAs or the termination of the public housing and/or voucher programs due to the Rental Assistance Demonstration (RAD). The calculation of burden hours is further reduced due to the automation of the forms. HUD estimated that automating the PHA Plan form will reduce both the PHA and HUD administrative burden by approximately 25%.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information (do not include the cost of any hour burden shown in Items 12 and 14).

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There is no additional cost to respondents for reporting or recordkeeping for collection of this information for the elements:
(a) total capital and start-up cost; and (b) total operation and maintenance and purchase of services.

Respondents' costs were covered under the OMB approval for the standard PHA Plan at the time it was originally implemented in 1998. No proposed costs are associated with submission of a further streamlined PHA 5-Year/Annual Plan submission. Ongoing respondent costs to file and maintain PHA Plan records, schedule public hearings, make documents available to the public, etc. may be estimated as follows:

Total Estimated Annual Costs to Respondents						
	Number of Plans	Average Annual Hours for Staff Time		*Hourly Rate		Average Annualized Cost
Annual PHA Plan Submissions	1,496	2	2,992	$26.62		$79,647
Five-Year PHA Plan Submissions	752.6 (3,763/5)	2	1,505	$26.62		$40,068
TOTAL Estimated Staff Time for Filing and Recordkeeping	2,248.6	2	4,496.2	$26.62		$119,715
*The FY23 hourly cost for response assumes a GS-9, Step 5 ($55,564), Executive Assistant, hourly rate is $26.62.						

14. Provide estimates of annualized cost 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 also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The estimated annualized costs to the federal government, based on a GS-12, Step 5 rate are provided below. A GS-12 Step 5 rate is the average salary for a Field Office Analyst/Manager.

Total Estimated Annual Costs to the Federal Government						
	Number of Plans	Average Annual Hours for Staff Time to Review and Process Plans		Hourly Rate	=	Annualized Cost
Annual PHA Plan Submissions	1,496	2	2,992	$38.61		$115,521
Five-Year PHA Plan submissions	752.6 (3,763/5)	2	1,505.2	$38.61		$58,116
TOTAL Estimated Annualized Cost	2,248.6	2	4,497.2	$38.61		$173,637
*The FY23 hourly cost for staff time to review and process annual and 5-Year PHA Plans assuming a GS-12, Step 5 ($80,579), Analyst or Manager; hourly rate is $38.61.						

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

In January 2021 HUD requested from OMB that the PHA Plan collection be reinstated with change. These changes included the addition of a new section to accommodate the anticipated fair housing planning requirements of the 2015 Affirmatively Furthering Fair Housing (AFFH) Rule and the introduction of the MTW Supplement. OMB approved the changes, reinstated the collections and HUD made the new templates available to PHAs on the HUD website as individual word processing files. After publication, HUD made subsequent minor changes to the forms and certifications to remove unnecessary sections, make minor edits and to account for updated or eliminated regulatory citations. Additionally, HUD took steps to automate the MTW supplement in the Housing Information Portal (HIP).

With this current proposed information collection, HUD intends to automate all PHA Plan templates and certifications. While the templates will be automated, the content and required elements will be mostly the same with a few modifications as needed to account for recent changes in regulations. Modifications to the collection include the following:

1) HUD is adding an additional element to the HUD-50075-HCV form. The revised HUD-50075-HCV form will include an additional element requiring Section 8 only PHAs to report on their Project Based Voucher (PBV) activities. This template will be used by HCV-only PHA's that administer the Housing Choice Voucher (HCV) program which may also include PBV developments.
2) HUD is adding an optional feature for PHA's to attach their written Admission and Continued Occupancy Policy (ACOP) or Administrative Plan documents to their Five-Year Plan and Annual Plan submissions. This will create a centralized database of all local PHA policies which currently can only be found at each individual PHA or on their websites.
3) Section D of the PHA Plan Templates, meant to address the fair housing goals as was originally required by the 2015 Affirmatively Furthering Fair Housing (AFFH) rule, has been removed. This is due to the 2020 Preserving Neighborhood and Community Choice (PNCC) rule rescinding the 2015 AFFH rule which eliminated the requirement for HUD grantees to conduct fair housing planning. On June 10, 2021, HUD published an AFFH interim final rule (IFR) which does not restore the 2015 AFFH rule for HUD grantees to conduct fair housing planning only that grantees meaningfully certify that they are meeting the Fair Housing Act's AFFH obligation. The language in the HUD certifications have been updated to reflect this change.
4) Additional edits have been made to the PHA Plan templates as required by the Housing Opportunity Through Modernization Act of 2016 (HOTMA) - Housing Choice Voucher (HCV) and Project-Based Voucher (PBV) Implementation final rule. These edits include the addition of Section B.5 HUD Form 50075-5Y for PHAs to report PBV activities as required by 24 CFR 903.6(c). The HOTMA-HCV rule also required citation updates to account for the redesignation of paragraph (r) of 24 CFR 903.7 as paragraph (s).

5) Lastly, HUD will now strongly encourage complete electronic submission from all PHAs. Currently, PHA Plan templates are downloaded, edited, and submitted as email attachments which must then be individually uploaded, analyzed, and organized by HUD. Automating the PHA Plan forms will make the PHA Plan review process more efficient by streamlining the submission and review process thus reducing the administrative burden on both HUD and PHAs. HUD estimates that automating the PHA Plan form will reduce both the PHA and HUD administrative burden by approximately 25%. Electronic submission and collection of this information will also make future data and policy analysis feasible.

Overall, the burden hours associated with the collection is expected to decrease by 2,024 hours due to the automation of the PHA Plan templates. Additional time may be required in the first year to train PHAs on the system, however, because the Public Housing Portal is an existing HUD system that PHAs use and are familiar with, this burden is expected to reduce in subsequent years. Accordingly, the additional burden of the one-time training is not expected to exceed the time savings created by the system.

Finally, revisions were made to this collection to reflect adjustments in calculations based on the total number of current, active PHAs to date. Since the last approved information collection, the number of active public housing agencies has changed from approximately 3,780 to 3,763. The number of PHAs can fluctuate due to many factors, including but not limited to performance scoring, the merging of two or more PHAs or the termination of the public housing and/or voucher programs due to the Rental Assistance Demonstration (RAD).

16. For collection 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.

    Per 24 CFR 903.23(e), a public housing agency (PHA) must make their approved PHA Plan and required attachments available for public review and inspection at the principal office of the PHA during normal business hours. PHAs should also make this information available on their website.

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.

    The expiration date will be displayed on the collection instrument.

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

    No exceptions.

B. Collections of Information Employing Statistical Methods

This collection of information will not be used for statistical purposes.