

# Supporting Statement for Paperwork Reduction Act Submissions

## Information Collection:

### A. Justification

1. The following information collections are required to administer the MTW program.

All public housing authorities (PHA) are required to submit a five (5) year plan and annual plans as stated in Section 5A of the 1937 Act, as amended.. Moving to Work (MTW) PHAs that are subject to the Standard MTW Agreement submit an Annual MTW Plan and Annual MTW Report (also known as the HUD Form 50900) in lieu of the standard annual and 5 year PHA plans.

The Standard MTW Agreement was developed in 2007, and was transmitted to the existing MTW agencies in January 2008. As additional MTW PHAs were selected they too were provided with the Standard MTW Agreement. 39 MTW PHAs (known as the “Initial” MTW PHAs) currently operate under this agreement. In 2016, HUD extended the term of the Standard Agreement to the end of each agency’s 2028 Fiscal Year (FY).

The HUD Form 50900 is a required element as part of the Standard MTW Agreement and contains important information regarding the MTW PHA’s upcoming FY activities and a retrospective look back at the MTW PHA’s preceding FY. HUD collects the information in this form in order to evaluate the impacts of MTW activities, accurately and timely respond to congressional and other inquiries regarding outcome measures, and identify promising practices learned through the MTW demonstration.

Revisions are being made to the HUD Form 50900 to reduce the reporting and administrative burden on MTW PHAs. All standard metrics within the HUD Form 50900 that were previously required for MTW activities will be eliminated, though they will remain optional for MTW PHAs to report. In addition to eliminating previously required standard metrics, MTW PHAs will now have the option to share an annual narrative, self-reported PHA data, and participant success stories. In lieu of the agency-reported standard metrics, HUD will pull data already reported by the agencies through required HUD systems. This will reduce burden on the agencies.

Additional updates were made as part of the 30-Day Notice, including several based on public comments received from the previous 60-Day Notice. Updates have been made to specify if MTW PHAs are seeking to apply MTW Activities to any of its Special Purpose Voucher (SPV) types. This will reduce burden on MTW PHAs by streamlining and replacing the current SPV MTW waiver separate approval process for Emergency Housing Vouchers (EHVs), HUD-Veterans Affairs Supportive Housing (HUD-VASH) vouchers and Stability Vouchers (SVs). Also, SPVs are included in an MTW PHA’s planned leasing forecast for the upcoming Fiscal Year in order to provide a more comprehensive estimate of planned households served within the MTW PHA’s portfolio. Other changes include aligning planned new public housing bedroom size categories with HUD systems, an optional narrative to report on unique households served through local, non-traditional rental services programs such as short-term rental assistance, rapid rehousing, emergency housing, etc., a description section update to indicate whether waiting lists are site-based or agency-wide for public housing, and removing the PHA self-certification of meeting MTW Statutory Requirements.

Through the Annual MTW Plan and Report, each MTW PHA will continue to inform HUD, its residents and the public of the PHA’s mission for serving the needs of low-income and very low-

income families, and the PHA's strategy for addressing those needs. The Annual MTW Plan, like the Annual PHA Plan, provides an easily identifiable source by which residents, participants in tenant-based programs, and other members of the public may locate policies, rules, and requirements concerning the PHA's operations, programs, and services.

The appropriations act in 2016 authorized an additional 100 MTW slots and additional slots may be added through future appropriations acts. Eligible applicants interested in obtaining MTW designation are required to submit applications to HUD, as explained in the applicable HUD Notice. The information collection covers the information needed from applicants to determine which applicants should be selected. The information provided demonstrates the applicants' plans to implement a local MTW program and includes related applicant history. The application includes such information as narrative exhibits, certifications, data forms, and supporting documentation. The information will be used by HUD staff to evaluate threshold requirements and review applications.

## **2. How, by whom, and for what purpose the information collection is to be used**

A current listing of the 39 Initial MTW PHAs can be found on the Public and Indian Housing website at: [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/mtw/mtwagencies](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/mtwagencies). Participating MTW PHAs will submit an electronic version. After submission, copies of the documents are distributed to headquarters and field staff who participate in the monitoring and evaluation of the MTW demonstration. As indicated above, the information collection is used to provide a framework for local accountability and to the extent possible, an easily identifiable source by which public housing residents, housing choice voucher participants, and other members of the public may locate basic PHA policies, rules and requirements concerning its operations, programs and services, as well as planned changes to policies, procedures and activities for the coming year.

## **3. Technology applied to the collection:**

Under the Standard MTW Agreement, the MTW agencies will submit electronic copies (one to headquarters, one to the field office) of the Annual MTW Plan and Report to HUD annually. After receipt, MTW Plans and Reports are posted to the MTW Website within the PIH HUD Website.

## **4. Duplication of Effort:**

There is no duplication of effort. Information collected is unique to this collection and to each PHA and does not duplicate any similar information or method.

## **5. Impact on Small Business and Small Entities:**

This information collection has no impact on small businesses or other entities.

## **6. Consequence of Less Frequent Collection:**

The 1996 Appropriations Act requires each PHA participating in MTW to keep records and submit reports to HUD that document the PHA's use of program funds, provide data to assist HUD in assessing the MTW demonstration, and describe and analyze the effect of the PHA's

activities in addressing the objectives of the PHA's MTW plan. This information collection permits HUD to track the use of Federal funds spent by MTW Demonstration sites and to monitor this complex demonstration.

The Federal statutory mandate contained in Section 204 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996 (Public Law 104-134, 110 Stat 1321), dated April 26, 1996 would not be met if the collection were not conducted. The information collection is necessary to the continuation of the MTW program and so that the available funds are used to meet the stated purpose of the MTW Demonstration.

## 7. Special Circumstances for Information Collection:

There are no special circumstances that would cause this information collection to be conducted more often than quarterly, in fewer than 30 days, or more than one hard-copy original and two electronic copies.

- requiring respondents to report information to the agency more than quarterly;  
**Not Applicable**
- 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. Federal Register Notice and Public Comments:

This information collection was announced in the *Federal Register*, Volume 88, Page 86923, on 12/15/2023. The public was given until 02/13/2024, to submit comments on the proposed information collection. HUD received various comments on this proposed collection. All public comments and responses were uploaded as a supplemental document.”

## 9. Payment/Gifts to Respondents:

No payments or gifts are provided to respondents for any of this information collection.

## 10. Assurances of Confidentiality:

The Annual MTW Plan and Report and application submitted to HUD are public information and do not lend themselves to confidentiality.

## 11. Questions of a Sensitive Nature:

No sensitive questions are being asked for in the MTW plans and reports.

## 12. Estimate of Annual Burden Hours for Information Collection:

We estimate that costs to the respondents to complete this information collection will not exceed those incurred by regular grant administration, planning and management and are expected to bring a cost savings to the respondents.

The chart below outlines the burden associated with the various aspects of the MTW application, plan and reports. Each of the items listed is a category within the list of items that must be submitted for the MTW plans and reports. All elements are included in the plan and the report. In the plan the PHA outlines the approaches that they will be utilizing during the new fiscal year and include any data or information appropriate to explain their plans, then the report draws directly from the plan when the PHA outlines their actual experiences and accomplishments during the year and explains any differences between the plan submission and the reported accomplishments.

	Respondents	Annual responses/ Respondent	Total responses per year	Burden per year per Respondent	Total burden hours	Cost Burden <sup>1</sup>
<b>Program Information</b>						
Application	0	0	0	0	0	\$0
50900 “Annual MTW Plan and Report Elements”						
Introduction	39	2[2]	78	3	234	\$13,090
General Housing Authority Information	39	2	78	15	1170	\$65,450
Proposed MTW Activities	39	1[3]	39	50	1950	\$109,083
Ongoing MTW Activities	39	2	78	20	1560	\$87,266
Sources and Uses of Funding	39	2	78	15	1170	\$65,450
Administrative	39	2	78	7	546	\$30,543
Certifications of Compliance	39	1[5]	39	5	195	\$10,908
<b>Total Burden</b>	<b>39 total</b>	<b>varies</b>	<b>468</b>	<b>115</b>	<b>6,825</b>	<b>\$381,791</b>

<sup>1</sup> Based on an average hourly cost of \$55.94

**13. Cost Burden of Information Collection:**

There is no cost burden to respondents aside from the time burden referenced in 12 above.

**14. Annualized Cost to Federal Government:**

We do not estimate that there will be any additional costs to the Federal government for any of this information collection. Staff assigned to review the MTW plan and report would have previously been reviewing the five (5) year plan and standard PHA plan for each of these sites. The average grade for the staff working on MTW is GS-13, and they spend approximately 10 hours reviewing and exchanging information with the sites for each plan and report. This translates to 10 hours for 39 reports and 39 plans (780 hours) at the average wage of a GS-13 - \$61.03 per hour (step 5). Total cost = \$47,606.

**15. Changes or Adjustments to OMB Form 83-I:**

This is a revision of a currently approved collection. Through this revision, HUD is adjusting the total burden hours estimate to account for the removal of the “Standard HUD Metrics” section and the addition of two optional sections.

As stated above, all PHAs are required to submit a five (5) year plan and annual plans as required by Section 5A of the 1937 Act, as amended, however, MTW PHAs submit the MTW annual plan and annual report in lieu of the standard annual and 5 year PHA plans. OMB approval for an alternate submission was sought and approved and the current 50900 form expires on March 31, 2024. However, at this time in the demonstration it is necessary to update the form to provide more uniform data collection across agencies. This will assist in gathering the most accurate, comparable data so the Department is able to better respond to Congressional and other inquiries regarding outcome measures obtained and promising practices learned throughout the duration of the demonstration. Through the revised form, respondents will report outcome information to accurately evaluate the effects of MTW policy changes on residents, the agency’s operations and the local community.

**16. Publication of Information Collection Results:**

Information collection results are not tabulated and published in the traditional sense, however, plans and reports are converted to Adobe Acrobat files and posted to the Moving to Work web site on an ongoing basis, as they are submitted.

**17. Expiration Date:**

The OMB approval number and date will appear on the HUD-prescribed forms.

**18. Exceptions to Certification Statement:**

There are no exceptions to the certification statement identified in item 19.

**B. Collections of Information Employing Statistical Methods**

There are no collections of information that employ statistical methods.

