Supporting Statement for Paperwork Reduction Act Submissions

New Title: Disaster Response Survey and Disaster Recovery Survey

Old Title: Survey to Assess Operational Status and Capacity of Housing Counseling Agencies Due to a Disaster/National Emergency

OMB Control Number: 2502-0615

Forms: None

A. Justification

The Office of Housing Counseling (OHC) is responsible for administration of the Department's Housing Counseling Program, authorized *by Section 106 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701w and 1701x)*. The Housing Counseling Program supports the delivery of a wide variety of housing counseling services to homebuyers, homeowners, low-to moderate–income renters and the homeless. The primary objectives of the program are to expand homeownership opportunities, preserve homeownership and improve access to affordable housing. The housing counselors provide guidance and advice to help families and individuals improve their housing conditions. After a disaster, these services may expand to include assessing housing, financial, and other issues caused by the disaster emergency, discussing the best resources for assistance, working with local resources that may provide with additional assistance, helping communicate with lenders, insurance companies and government agencies, and helping with necessary paperwork. There may also be changes to agency operations, such as doing business virtually.

To participate in HUD's Housing Counseling Program, a housing counseling agency must be approved by HUD, or be designated as a subgrantee or affiliate of a HUD-approved intermediary, multi-state organization, or a state housing finance agency. A participating agency shall deliver housing counseling services consistent with the agency's housing counseling work plan. Housing counseling required under or provided in connection with any HUD programs must be provided only by certified housing counselors certified by HUD and who work for organizations approved to participate in HUD's Housing Counseling Program. To be certified, an individual must both pass a standardized written examination covering six major topic areas, and work for an agency approved to participate in HUD's Housing Counseling Program.

Section *24 CFR § 214.303* outlines performance requirements for agencies to maintain approval status. Section *24 CFR § 214.305* requires, among other things, that agencies notify HUD when any aspect of the agency's purpose or functions may impair its ability to comply with these regulations or the applicable grant agreement within 15 days. The notification can be by email or letter. During a performance review, pursuant to *24 CFR § 214.307*, the HUD staff verifies that these notifications have occurred.

HUD-9902 is designed to capture the education and counseling activities of all HUD-approved Housing Counseling Agencies (HCA) within HUD's fiscal year. Agencies must report data for disaster education, one-on-one disaster counseling, and impact of one-on-one disaster counseling. *The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Public Law 93-288)* as amended, also has disaster reporting requirements.

However, a disaster makes it critical that OHC receive information on its impact on HUD-participating housing counseling agencies quickly and with consistent input in the response and recovery periods of the disaster. As there are two distinct phases of a disaster, i.e. Response and Recovery, this revised collection has two surveys. The Disaster Response Survey and the Disaster Recovery Survey allow more accurate assessment of the operating status and capacity of impacted housing counseling agencies to provide their approved counseling services throughout the life cycle of a disaster. Responses to both surveys are voluntary.

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 purpose of the two voluntary Disaster Surveys (Disaster Response Survey and the Disaster Recovery Survey) is to collect information from HUD Participating Housing Counseling Agencies on the impacts of a disaster on their operations throughout the life cycle of a disaster. The information collected by the surveys will be used by OHC to determine the ability of housing counseling agencies to perform their required functions during a disaster. Housing counseling agencies will be asked about their operational status and their capacity to provide approved services. Information collected will include the status of the agencies' ability to communicate, operate remotely, and provide services to clients. The information collected will be used to identify the needs of the housing counseling agency and to inform OHC about the types of support that would be the most responsive to the needs of agencies and their clients.

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.

Both Disaster Surveys (Disaster Response Survey and the Disaster Recovery Survey) will be conducted by the electronic survey instrument SurveyMonkey, with contacts made via email and phone by OHC staff. Emails sending out the two surveys will explain the purpose of the surveys and give instructions. Reponses are voluntary and informational only. The Disaster Response Survey will be sent out immediately as soon as communication is available following a national disaster to agencies in the impacted area. The Disaster Recovery Survey will be sent out post disaster to the agencies in the impacted areas and may be sent out several times depending on the length of the recovery period. The Housing counseling agencies will be able to access the surveys at Disaster Response Survey: https://www.surveymonkey.com/r/YTVZLWG and Disaster Recovery Survey: https://www.surveymonkey.com/r/TZHBHYQ. OHC staff will access the responses at SurveyMonkey.com. A report summarizing all the responses will be prepared for management and saved to OHC SharePoint. Agency responses will not be part of their HUD files or included in a Performance Review.

The surveys will also be sent to housing counseling agencies after other local, regional, or state disasters occur using the same process.

Utilizing SurveyMonkey makes it easier for agencies to report operational readiness and reduce paperwork by eliminating the need for agencies to complete and mail paper responses, as well as reducing postage costs.

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.

This is a revised collection. As disasters continue to occur with increasing frequency, this revised collection is necessary to assess the operational capacity of each agency after each disaster and to better support an agency's efforts to address the needs of the victims of a disaster. Information from past disasters is no longer valid. This information is not available from any other sources.

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.

HUD makes every effort to minimize the burden of information collection to all organizations participating in the Housing Counseling Program. Only information critical to evaluating an organization's compliance with program requirements is collected. Using SurveyMonkey simplifies the collection of data and minimizes the burden of Housing Counseling Agencies, many of which are small businesses.

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.

If there was not an assessment of the operational status and capacity of housing counseling agencies due to a disaster HUD would not be able to provide the necessary support and assistance to housing counseling agencies and their clients to assist in their operations.

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

* requiring respondents to report information to the agency more often than quarterly;

The nature of disasters may require the surveys to be deployed more frequently than on a quarterly basis. The surveys will be deployed after disasters and the frequency of disasters is not predictable. The operating status and ability of an agency to provide services may change over the course of a disaster and may require more frequent data collection. The Department may need more frequent updates to respond appropriately.

* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

Agencies are not required to prepare a written response.

*requiring respondents to submit more than an original and two copies of any document;

Agencies respond electronically through SurveyMonkey. No other documents are needed.

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

Respondents are not required to retain records for more than three years.

* 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;

There is no statistical survey.

* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

There is no statistical survey or 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;

There is no additional pledge of confidentiality.

or

* 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 such requirement.

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 5 CFR 1320.8(d), a 60-day Federal Register Notice soliciting public comments was announced in the Federal Register on December 11, 2024, Volume 89, Page 99896. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on XX-XX-XXXX, Volume XX, Page XXXXX. No comments were received.

In 2023, OHC held a Disaster Listening Session with housing counseling agencies to obtain feedback and shared experiences about responding to disaster. The information was incorporated into the two Disaster Surveys (Disaster Response Survey and the Disaster Recovery Survey). In the development phase of these two surveys, OHC staff conducted a test-run to determine whether the content addressed the data needs and was user-friendly.

The following Housing Counseling Agencies participated in the April 2024 Disaster Listening Session: Hale Mahaolu of Hawaii; Legal Aid Society of Hawaii; Boulder County, Colorado; Money Management International.

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

There are no payments or gifts to respondents with respect to this collection.

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

Information is requested only from housing counseling agencies, not individual clients. No PII is requested in either the Disaster Response Survey or the Disaster Recovery Survey, since information is not collected from clients. HUD is committed to protecting the privacy of individuals' information stored electronically or in paper form, in accordance with federal privacy laws, guidance, and best practices. The Public Burden Statement is posted on both the Disaster Response Survey and the Disaster Recovery Survey.

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.

There are no questions 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 for approval 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.

* 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.

Estimated Annualized Burden Hours and Costs

Information Collection / Type of Respondents	Form Name / Form Number Collection Tool	Number of Respondents	Frequency of Response	Responses Per Year	Average Burden Hours Per Response	Annual Burden Hours	Hourly Cost per Response (Hourly Wage Rate)	Total Annual Respondent Cost
Not-for-profit institutions (housing counseling agencies)	Disaster Response Survey	1,250	1	1,250	1	1,250	$90.78	$113,475.00
Not-for-profit institutions (housing counseling agencies)	Disaster Recovery Survey	1,250	3	3,750	1	3,750	$90.78	$340,425. 00
TOTALS		2,500		5,000		5,000		$453,900.00

Note: The "Avg. Hourly Wage Rate" for each respondent includes a 1.46 multiplier to reflect a fully-loaded wage rate.
"Type of Respondent" should be entered exactly as chosen in Question 3 of the OMB Form 83-I

According to the 2023 U.S. Department of Labor, Bureau of Labor Statistics website (https://www.bls.gov/oes/current/oes_nat.htm) the wage rate category for 11-1021, General and Operation Managers is estimated to be $90.78 ($62.18 x 1.46) per hour, therefore, the estimated burden hour cost to respondents General and Operation Managers is estimated to be $453,900 annually.

.13. Provide an estimate for 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 and 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 collections 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 are no recordkeeping, capital, start-up or maintenance costs associated with this information collection.

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 expenses 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.

Annual Cost to the Federal Government

Item	Cost ($)

Contract Costs: **There are NO contract costs associated with this collection.**	$0.00
Staff Salaries **1 GS 13. step 10 employee spending approximately.05% of time annually to analyze data for this data collection.** Using (GS 13-10) $**153,354 = $153,354. x 1.46 (wage rate multiplier) = $223,896.84 (fully-loaded) x .5 (.05% of time spent) = $11,194.84**	$11,194.84
Facilities **[cost for renting, overhead, etc. for data collection activity]**	$0.00
Computer Hardware and Software **[cost of equipment annual lifecycle]**	$ 800.00
Equipment Maintenance **[cost of annual maintenance/service agreements for equipment]**	$0.00
Travel	$0.00
Printing **[number of data collection instruments annually]**	$0.00
Postage **[annual number of data collection instruments x postage]**	$0.00
Other	$0.00
Total	**$11,994.84**

* Note: The "Salary Rate" includes a 1.46 multiplier to reflect a fully-loaded wage rate.

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 revision of a currently approved collection, ***Survey to Assess Operational Status and Capacity of Housing Counseling Agencies Due to a Disaster/National Emergency***, has been replaced with two new surveys**, DISASTER RESPONSE SURVEY and DISASTER RECOVERY SURVEY.** The collection's title has also been changed to reflect the two new surveys.

The previous survey (Survey to Assess Operational Status and Capacity of Housing Counseling Agencies Due to a Disaster/National Emergency) was intended to determine the impact of the COVID pandemic on housing counseling agencies. Therefore, all HUD approved housing counseling agencies (1614) were contacted once. It did not request disaster data. That survey did not meet OHC's current need to determine the impact of a disaster on the operations of impacted housing counseling agencies. Based on OHC experience about disasters, there are two distinct phases of a disaster which impact housing counseling agencies differently. That is why this revised collection has two surveys - Disaster Response Survey and Disaster Recovery Survey, each requesting different data. The change in focus of the two surveys resulted in different responses, burden hours and cost. For any one disaster, an impacted housing counseling agency will receive both surveys. OHC estimates there will be an average of 10 impacted housing counseling agencies per disaster with 125 disasters annually. The Disaster Response Survey will be sent only once to the 1250 impacted housing counseling agency immediately following a disaster. The Disaster Recovery Survey is a follow-up survey and will be sent up to three times to the 1250 impacted housing counseling agencies.

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.

The results of the information collection 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 will display the expiration date for OMB approval of this information collection.

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

HUD does not request an exception to the certification of this information collection.

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this collection.