**Supporting Statement for Paperwork Reduction Act Submissions**

**Voucher Management System (VMS)**

**(OMB# 2577-0282)**

**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.**

The Housing Choice Voucher (HCV) Program is the federal government's major program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Since housing assistance is provided on behalf of the family or individual, participants can find their own housing, including single-family homes, townhouses, and apartments. The participant is free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects.

HCVs are administered locally by public housing agencies (PHAs). The PHAs receive federal funds from the U.S. Department of Housing and Urban Development (HUD) to administer the voucher program. The Voucher Management System (VMS) is HUD’s main data system in terms of supporting program management. HUD uses VMS data as submitted by the PHAs to recalculate program renewal funding for each PHA each calendar year, to calculate the administrative fees earned by PHAs, to monitor program performance and utilization, to anticipate potential problems such as funding shortfalls at PHAs, and to inform research on various aspects of the program. To maintain valid forms for PHA submission, we are requesting the expiration dates be extended by three years on the current forms.

Authorities for the information collection under this PRA are: United States Housing Act of 1937 (42 U.S.C. 1437 *et seq*.); Housing and Community Development Act of 1987 (42 U.S.C. 3543); Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d); Fair Housing Act (42 U.S.C. 3601-19); Section 904 of the Stewart B. McKinney Homeless Assistance Amendments Act of 1988, as amended by Section 903 of the Housing and Community Development Act of 1992 and Section 3003 of the Omnibus Budget Reconciliation Act of 1993 (42 U.S.C. 3544).

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.**

Financial Forms HUD- 52672, 52681, 52681-B, 52663 and 52673 are completed at the Public Housing Agency level when administering Section 8/Mod-Rehab/SRO/Mainstream programs. The PHAs are to keep these on file in their office

The Voucher Management System (VMS) is the electronic HUD 52681-B where PHAs are required to enter their actual HAP Expenses for their programs and administrative fees monthly. This monthly data is used to calculate their monthly HAP disbursements for their various HCV, Administrative, and Mainstream programs

PHAs are required to submit forms HUD- 52672, 52681, 52663 and 52673 by email or mail to their Financial Management Center (FMC) Financial Analyst annually when administering Mod-Rehab/SRO programs to establish their budget and process their Year-End Settlements.

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 to adopt this means of collection. Also describe any consideration of using information technology to reduce burden.**

Forms HUD- 52672, 52681, 52663 and 52673 can be manually entered by hand at the PHA level or electronically in PDF and submitted via email or mailed to the FMC in Kansas City. Form 52681-B is automated by the Voucher Management System (VMS) and entered monthly using Secure Systems log in at the PHA level. Submitting electronically is more cost effective for the PHA and timely.

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.**

None. This information is not currently collected at this time in a separate field.

5. **If the collection of information impacts small businesses or other small entities describe any methods used to minimize burden.**

N/A

6. **Describe the consequences 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.**

Form 52681-B burden associated with not collecting these forms consists of (1) information necessary for HUD to carry out its budget, allocation, oversight, and cash management functions or (2) information necessary for PHAs to comply with contractual

arrangements or a statutory mandate. Forms HUD-52672, 52681, 52663, 52673 need to continue being collected because PHAs that administer the HCV program are required to maintain financial reports in accordance with accepted accounting standards to

permit timely and effective audits.

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

1. requiring respondents to report information to the agency more than quarterly;

As noted above, Housing Assistance Payments actual expenses should be entered into VMS monthly (Form 52681-B).

1. requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; N/A
2. requiring respondents to submit more than an original and two copies of any document; N/A
3. requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years; N/A
4. 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; N/A
5. requiring the use of a statistical data classification that has not been reviewed and approved by OMB; N/A

1. 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 N/A
2. 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. N/A
3. **If applicable, provide a copy and identify the date and page number of publications 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 people 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.**

Agency notice of proposed information collection was published for public comment (FR-7091-N-07) Vol 89, Page 85552 in the Federal Register on 10/28/2024. There were no public comments received.

* **Consultations 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.**

N/A

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

No payments or gifts to respondents are provided.

1. **Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

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). SORN & PIA are N/A

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 people from whom the information is requested, and any steps to be taken to obtain their consent.**

N/A. This collection/VMS does not collect any such information.

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 the chart below; 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.**

An estimated hourly cost for response assuming individual is a Financial Specialist with an hourly rate of $38.50 per hour. 38,754 hours times average hourly costs of $38.50 = $1,492,029 for form 52681-B & 225 hours for the rest of the collections is $8,662.50.

Frequency of response varies due to all PHAs being required to submit 52681-B monthly and the rest of the collection is only required annually.

Estimated title/wages were found using U.S Bureau of Labor Statistics (BLS) May 2023 National Occupational Employment and Wage Estimates [May 2023 National Occupational Employment and Wage Estimates](https://www.bls.gov/oes/current/oes_nat.htm).

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| **Information Collection** | **Number of Respondents** | **Frequency of Response** | **Responses**  **Per Annum** | **Burden Hour Per Response** | **Annual Burden Hours** | **Hourly Cost Per Response** | **Annual Cost** |
| Financial Forms (HUD- 52681-B) | 2,153 | 12 | 25,836 | 1.5 | 38,754 | $38.50 | **$1,492,029** |
| HUD-52681 | 150 | 1 | 150 | 1.5 | 225 | $38.50 | **$8,662.50** |
| HUD-52663 | 150 | 1 | 150 | 1.5 | 225 | $38.50 | **$8,662.50** |
| HUD-52672 | 150 | 1 | 150 | 1.5 | 225 | $38.50 | **$8,662.50** |
| HUD-52673 | 150 | 1 | 150 | 1.5 | 225 | $38.50 | **$8,662.50** |
| Total | 2,753.00 |  | 26,436.00 |  | 39,654.00 |  | **$1,526,679.00** |

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 already reflected on the burden worksheet shown in Items 12 and 14).** N/A

1. 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 consider costs associated with generating, maintaining, and disclosing or providing 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 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;
2. 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.
3. 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.

N/A

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 expenses 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.**

Estimated cost to federal government was calculated using the [2025 OPM Salary & Wages Table](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/KC_h.pdf). Hourly cost is estimated based off Kansas City-Overland Park-Kansas City, MO-KS GS13 Step 1 since these forms are reviewed/processed by the FMC headquarters in Kansas City, MO:

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| **Information Collection** | **Number of Respondents** | **Frequency of Response** | **Responses**  **Per Annum** | **Burden Hour Per Response** | **Annual Burden Hours** | **Hourly Cost Per Response** | **Annual Cost** |
| Financial Forms (HUD- 52681-B) | 2,153 | 12 | 25,836 | 1.5 | 38,754 | $51.32 | **$1,988,855.28** |
| HUD-52681 | 150 | 1 | 150 | 1.5 | 225 | $51.32 | **$11,547** |
| HUD-52663 | 150 | 1 | 150 | 1.5 | 225 | $51.32 | **$11,547** |
| HUD-52672 | 150 | 1 | 150 | 1.5 | 225 | $51.32 | **$11,547** |
| HUD-52673 | 150 | 1 | 150 | 1.5 | 225 | $51.32 | **$11,547** |
| Total | 2,753 |  | 26,436 |  | 39,654 |  | **2,035,043.28** |

15. **Explain the reasons for any program changes or adjustments reported in Items 12 and 14 of the Supporting Statement.**

No changes just extension of forms.

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.**

Information will be published to HUD.gov upon OMB approval.

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 is not seeking approval to avoid displaying the OMB expiration date.

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

N/A

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