

**Supporting Statement for Paperwork Reduction Act Submissions  
Enhancing and Streamlining the Implementation of Section 3 Requirements for Creating  
Opportunities for Low- and Very-Low Income Persons and Eligible Businesses  
OMB# 2501-0041**

**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.

This request is for an extension of a currently approved collection of new sample certification forms in support of 24 CFR Part 75 called “Enhancing and Streamlining the Implementation of Section 3 Requirements for Creating Opportunities for Low- and Very Low-Income Persons and Eligible Businesses.” 24 CFR § 75.31 that outlines the ways a worker can be certified as an eligible Section 3 worker. These sample certification forms address these options and are completely voluntary. While grantees and workers do need to retain some type of certification, they do not have to use these forms. These forms are provided as samples of what could be retained for certification purposes.

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.

HUD does not collect the forms contained in this information collection request, nor does the agency collect any of the information contained in the forms. Section 3 grantees are simply required to retain documentation of worker and business certifications per 24 CFR § 75.31. The purpose of these forms is to provide sample certification forms that can be, but are not required to be, used by Section 3 workers, Targeted Section 3 workers, Section 3 Business Concerns, and/or Section 3 grantees. The sample certification forms can be used by low- and very low-income individuals, public housing agencies (PHAs), or employers to self-certify the following:

- (i) A worker’s self-certification that their income is below the income limit from the prior calendar year;
- (ii) A worker’s self-certification of participation in a means-tested program such as public housing or Section 8-assisted housing;
- (iii) Certification from a PHA, or the owner or property manager of project-based Section 8-assisted housing, or the administrator of tenant-based Section 8-assisted housing that the worker is a participant in one of their programs;
- (iv) An employer’s certification that the worker’s income from that employer is below the income limit when based on an employer’s calculation of what the worker’s wage rate would translate to if annualized on a full-time basis; or

(v) An employer's certification that the worker is employed by a Section 3 business concern.

These certification documents can be used by the eligible Section 3 worker, business, or grant recipient to maintain workers of worker certification.

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.

These sample certification forms are not collected by HUD but are merely provided to give grantees examples of how certification forms can be retained in satisfaction of recordkeeping requirement at 24 CFR § 75.31. These forms will be available in a fillable format that can both be printed to be physically filled by a worker, business, or grantee, or electronically filled and saved on a computer.

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.

There is no duplication of information.

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

This collection does not impose a significant burden on Small Entities.

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.

There is no consequence if the collection is not conducted, the forms are sample forms and as noted in #2, there are multiple ways a worker can be certified.

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; **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 study; **Not Applicable**
  - requiring the use of a 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. 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.

In accordance with 5 CFR 1320.8(d), the agency's notice announcing this collection of information appeared in the Federal Register on 06/10/2024 (Volume 89, No 112, Page 48914). The public was given until 08/09/2024, to submit comments on the proposed information collection. There were no comments received.

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

This information collection does not involve any payments or gifts to respondents.

10. 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.

There is no assurance of confidentiality to respondents on the sample certification forms. HUD may review these forms as part of monitoring compliance but will not collect the forms.

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.

No information collection requests information 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 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.

<b>Information Collection</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Responses Per Annum</b>	<b>Burden Hour Per Response</b>	<b>Annual Burden Hours</b>	<b>Hourly Cost Per Response</b>	<b>Annual Cost</b>
HUD Form 4736 – PH Certification Form	150	1	150	0.5	75	\$62.18	\$4,663.50
HUD Form 4736A – Employer Certification HCD	500	1	500	0.5	250	\$56.23	\$14,057.50
HUD Form 4736B- Employer Certification PHA	500	1	500	0.5	250	\$56.23	\$14,057.50
HUD Form 4736C- Employee Self Certification HCD	500	1	500	0.5	250	\$7.25	\$1,812.50

HUD Form 4736D- Employee Self- Certification PHA	500	1	500	0.5	250	\$7.25	\$1,812.50
Total	2,150.00		2,150.00	2.5	1,075.00		\$36,403.50

- Employee Certifications (HUD Forms 4736C and 4736D) are set at the federal minimum wage as the target audience is low- and very low-income workers.
- \*The employer certifications (HUD Forms 4736A and 4736B) are primarily utilized by small business owners and construction managers with the mean hourly wage of \$56.23 (<https://www.bls.gov/oes/current/oes119021.htm>)
- The PH Certification (HUD Form 4736) will be completed by the Housing Authority and is set at the mean hourly rate of a General and Operations Manager, currently \$62.18 (<https://www.bls.gov/oes/current/oes111021.htm>)

Notes: Estimated burden averaged using a sample of respondents from the nation.

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).

- 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.

The estimates provided above include time spent for recordkeeping, completing both information collections, and review by HUD officials performing compliance reviews.

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.

<b>Information Collection</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Responses Per Annum</b>	<b>Burden Hour Per Response</b>	<b>Annual Burden Hours</b>	<b>Hourly Cost Per Response</b>	<b>Annual Cost</b>
HUD Form 4736 – PH Certification Form	150	1	150	0.5	75	\$50.49	\$3,786.75
HUD Form 4736A – Worker Employer Certification HCD	500	1	500	0.5	250	\$50.49	\$12,622.50
HUD Form 4736B- Employer Certification PHA	500	1	500	0.5	250	\$50.49	\$12,622.50
HUD Form 4736C- Worker Self Certification HCD	500	1	500	0.5	250	\$50.49	\$12,622.50
HUD Form 4736D- Employee Self-Certification PHA	500	1	500	0.5	250	\$50.49	\$12,622.50
<b>Total</b>	<b>2,150.00</b>		<b>2,150.00</b>	<b>2.5</b>	<b>1,075.00</b>		<b>\$54,276.75</b>

Note: Hourly rate estimate is equivalent to “Rest of United States” GS-13, Step 1 for 2025. HUD officials are located in field offices. (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/RUS.pdf>)

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

Extension of a currently approved collection with changes made to hourly costs per response to account for changes in estimated average hourly rates based on Bureau of Labor Statistics and OPM data.

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 entered on the sample forms will not be collected or published by HUD. However, HUD may review these forms as part of programmatic compliance monitoring.

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.

This information collection is not seeking approval to not display the expiration date for OMB approval of the information collection.

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

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

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