

Supporting Statement for Paperwork Reduction Act Submissions
Management Review for Multifamily Housing Projects
OMB# 2502-0178

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 information collection is used by HUD, by Mortgagees, and by Contract Administrators (CAs) to evaluate the quality of project management; determine the causes of project problems; devise corrective actions to stabilize projects and prevent defaults; and to ensure that fraud, waste and mismanagement are not problems for the community. The information collected also supports enforcement actions when owners fail to implement corrective actions. The term Contract Administrators includes Performance-Based Contract Administrators and Traditional CAs.

Regulatory Authority- Management Reviews

- 24 CFR 880.612, states that “. . . the contract administrator will inspect the project and review its operation at least annually”
- 24 CFR 884.224, 24 CFR 886.130 and 24 CFR 886.335, provide that “. . . HUD will review project operations at such intervals as it deems necessary”
- 24 CFR 891.450 states that “HUD shall conduct periodic on-site management reviews”

Administrative Requirements

- HUD Handbook 4350.1, REV-1, Chapter 6, provides guidance and procedures for conducting and evaluating on-site management reviews.
- HUD Handbook 4566.2, Chapter 6 governs the mortgagee on-site management review responsibilities.

VAWA Lease Addendum Authority

The Violence Against Women Reauthorization Act of 2013 (Pub. L. 113-4) and the Violence Against Women Reauthorization Act of 2022 (Pub. L. 117-103) require HUD to implement protections for victims of domestic violence, dating violence, sexual assault, or stalking. HUD published its final rule implementing VAWA 2013 at 81 FR 80724 (Nov. 16, 2016). HUD developed form HUD-91067, Lease Addendum for Multifamily Housing Programs, to incorporate VAWA protections into multifamily housing program leases. 24 CFR 5.2005(a)(4).

For purposes of this collection, HUD-91067 is specifically incorporated into OMB Control No. 2502-0178 for use in multifamily housing programs.

Notwithstanding the title of the statute, VAWA protections apply to all victims regardless of sex, marital status, or age. The lease addendum ensures tenants are informed of their rights in the lease.

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-9834

This is a revision of a currently approved collection. Form HUD-9834 is collected by the reviewer (HUD staff, Mortgagees, or CAs depending on the type of review) to gather and record information during on-site reviews of project operations. HUD Staff and Mortgagees collect information from portions of the form for unsubsidized projects. CAs collect information using the entire form except where noted “This section applies only to HUD Staff and Mortgagees.”

- **Contract Administrators or HUD Staff** use the HUD-9834 to conduct a Management and Occupancy Review (MOR). The goal is to assess how well the Owner/Agent is complying with program requirements—leasing, tenant eligibility, Enterprise Income Verification use, property maintenance, and financial controls. More specifically, the HUD-9834 provides a checklist of items to be reviewed, and Owners/Agents are evaluated in the following areas:
 - o General Appearance and Security;
 - o Follow-up and Monitoring of Inspections;
 - o Maintenance and Standard Operating Procedures;
 - o Financial Management/Procurement;
 - o Leasing and Occupancy;
 - o Tenant/Management Relations; and,
 - o General Management Practices.

The Contract Administrator or HUD Staff engages in a desk review portion of the HUD-9834 and is collected prior to the on-site review using HUD systems and project file information. The desk review is used to reduce public reporting burden and prepare the reviewer for conducting the on-site review. The Contract Administrator or HUD Staff then conducts the on-site review and are required to provide the information used by HUD to assess management operations.

Upon completion of the on-site review, the reviewer is required to complete the HUD-9834, *Management Review Summary Report - Findings* portion, which is used to:

- o Summarize the information gathered on the HUD-9834;
- o Assign an evaluation rating for each of the seven areas of project management listed above;
- o Formulate an overall rating;
- o Report specific problems; and
- o Describe required corrective actions and set target completion dates.

The Contract Administrator or HUD Staff will then mail the HUD-9834, Management Review Summary Report and findings to the Owner/Agent.

- **Owner/Agents** must provide all information required for the MOR for the on-site review and are required to provide the information used by HUD to assess management operations and compliance with HUD's regulations. This documentation includes tenant files, policies, waitlists, EIV reports, and financial records. Owners/Agents must also respond to Contract Administrators' requests for specific documentation prior to the MOR.

HUD 91067- VAWA Lease Addendum for Multifamily Housing Programs

HUD developed Form HUD-91067 to incorporate VAWA protections into multifamily housing program leases. 24 CFR 5.2005(a)(4).

- **Tenants** sign the addendum to acknowledge receipt of the VAWA Lease Addendum, including protections against denial, eviction, or termination of assistance based on victim status; confidentiality of information; and rights to emergency transfers.
- **Owners/Agents** execute and retain the form in tenant files consistent with VAWA regulatory requirements. The addendum may be provided to HUD upon request for monitoring or in connection with tenant complaints.
- The form is accompanied by forms HUD-5380 (Notice of Occupancy Rights) and HUD-5382 (Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), which provide tenants with instructions and mechanisms to assert VAWA protections.

Use of HUD-91067 furthers consistent implementation of VAWA protections across multifamily housing programs.

- 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.**

HUD-9834 requires on-site evaluation of project operations, review of policies and procedures, tenant/management interactions, and inspection of units and facilities. Because the purpose of the form is to capture observations and findings made during in-person reviews, the process cannot be fully automated. However, HUD systems and project files are used during desk reviews to reduce burden and prepare reviewers in advance of the on-site review.

HUD-91067 is executed by owners and tenants at lease signing or renewal. While many covered housing providers still complete and retain these forms in paper format, HUD makes the addendum available as fillable PDF through www.hudclips.org, which owners may integrate into electronic leasing systems where available. This flexibility supports electronic execution and recordkeeping, reduces errors, and promotes accessibility, while recognizing that lease documentation remains largely a customary business practice completed in person.

- 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 collection does not duplicate other HUD information requests. For HUD-9834, reviewers collect and analyze information that is not otherwise available through HUD systems or project files. While information is already maintained in HUD databases or project records, it is reviewed in advance as part of the desk review process to minimize duplication and reduce burden on owners and agents. The on-site review then focuses on validating management practices, tenant relations, and compliance with program requirements, which cannot be obtained from other sources.

For HUD-91067, the information is unique to the statutory requirements of the Violence Against Women Act. The addendum provides lease-level acknowledgement of rights and protections for tenants. There is no duplication with existing collections.

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

Some Owners and Management Agents of insured and HUD-held projects may qualify as small businesses and other small entities. For HUD-9834, the burden is minimized by limiting information requests to materials already maintained in the ordinary course of business. Reviewers also rely on HUD systems and project records for desk review activities, reducing the amount of information that owners and agents must provide during the on-site review.

For HUD-91067, burden on small entities is minimized because execution of leases and related addenda is a customary and usual business practice in the rental housing industry. HUD provides a standardized model addendum in a fillable format, eliminating the need for small covered housing providers to draft their own documents. This form requires only signature and retention in tenant files, without additional reporting or recordkeeping obligations.

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.

For HUD-9834, the information collected is essential for HUD, Mortgagees, and Contract Administrators to determine management competence, identify the causes of project problems, and design corrective actions to stabilize projects and prevent defaults. Without this collection, HUD would face a significantly increased risk of mortgage defaults and losses to the FHA insurance fund. In addition, HUD could not ensure that tenants are provided with decent, safe, and sanitary housing in compliance with statutory and regulatory requirements. Conducting reviews less frequently would undermine HUD's ability to detect and resolve compliance and management issues in a timely manner.

For HUD-91067, the lease addendum is the mechanism by which VAWA protections are incorporated into the lease and both tenants and owners acknowledge that the VAWA rights and protections apply in covered multifamily housing programs. . Not having a lease addendum could increase the vulnerability of victims of domestic violence, dating violence, sexual assault, or stalking and impair HUD's ability to oversee and enforce housing protections required by law.

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;
There is no requirement for respondents to report the information more than quarterly.
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
There is no requirement for respondents to prepare a written response to a collection in fewer than 30 days.
- requiring respondents to submit more than an original and two copies of any document;
There is no requirement for 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;
There is no requirement for 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;
This collection is not performed in connection with a statistical survey
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
There is no use of a statistical data classification.
- 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
There is no pledge of confidentiality that is not supported by authority established in statute or regulation.
- 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.
There is no requirement for respondents to submit proprietary trade secret, or other confidential 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.**

In accordance with 5CFR 1320.8(d), this information collection soliciting public comments was announced in the Federal Register on December 6, 2024, Volume 89, No. 235, Page 90762. Six (6) comments were received.

HUD published a 60-Day Notice of Proposed Information Collection for the program on December 6, 2024, Docket No. FR-7086-N-31. The present package addresses necessary revisions to HUD-9834, as well as the creation of additional form (VAWA Lease addendum) designed to reduce known program execution issues.

HUD received six public comments in response to the December 6, 2024, 60-Day Federal Register Notice. The respondents included Contract Administrators and housing advocacy groups. After reviewing the comments, HUD continues to propose the bulk of the changes it initially presented for HUD-9834 and continues to propose adding one document: VAWA Lease Addendum. Beyond the public comments, the post 60-day revisions incorporated parallel feedback from HUD's Office of Fair Housing and Equal Opportunity (FHEO) and Office of General Counsel (OGC). The forms were modified to address the revised federal instructions as HUD staff integrated changes from the 60-day comments.

The six substantive public comments came from the following organizations:

- Local Housing Administrators Coalition (LHAC)
- Southwest Housing Compliance Corporation (SHCC)
- National Association of Housing and Redevelopment Officials (NAHRO)
- Contract Management Services (CMS) of Bremerton Housing Authority

Public Comment Review

The majority of the comments received from the public were pertaining to HUD-9834. The major themes from the public comments were: (1) redundant elements of HUD-9834, (2) clarity and consistency of new guidance, (3) the types and level of detail for collected data, and (4) changes or additions to HUD-9834 response options.

(1) Redundant elements of HUD-9834

Two commenters (SHCC and NAHRO) said that some of HUD-9834's existing and additional forms were unnecessary, redundant, and/or administratively burdensome.

HUD Response: HUD believes that the changes will ensure that the Department is administering its programs in line with existing regulations and statutes. The proposed forms reflect the new guidance and congressional mandates established in the past few years. HUD integrated the improvements below into the forms to reduce burden and clarify reporting requirements.

(2) Clarity and consistency of new guidance

Three commenters (LHAC, SHCC, and NAHRO) questioned whether updates to the Housing Opportunity Through Modernization Act of 2016 and the National Standards for the Physical Inspection of Real Estate will have significant impact on the HUD-9834.

HUD Response: In conjunction with similar comments from HUD's FHEO and OGC staff, HUD modified the form to make requirements set forth in the Housing Opportunity Through Modernization Act of 2016 and the Physical Inspection of Real Estate apparent on the form. It is with this intention that HUD elected to update the HUD-9834.

(3) Level of detail

In April 2022, HUD published a final rule, "Streamlining Management and Occupancy Reviews for Section 8 Housing Assistance Programs," which governs how MORs are conducted. This rule governs the methods and schedule contract administrators, including Contract Administrators (CAs), to conduct and schedule these reviews.

All commenters (LHAC, SHCC, CMS, and NAHRO) mentioned that they support HUD's efforts to streamline MORs using a risk-based scheduling protocol. However, they each clarified that there are still issues present in the way HUD has laid out the MOR requirement for Owners and Agents of Section 8 housing.

HUD response: The Department appreciates the concerns of the commenters and is working expeditiously to ensure that the MOR process is as efficient as possible within a subregulatory capacity. However, the content of the final rule mentioned above is not directly related to the changes proposed in the HUD-9834.

Two commenters (NAHRO and SHCC) expressed the concern that collecting information through the HUD-9834 is not uniform, as there is a gap of subjectivity in MORs performed by CAs.

HUD Response: HUD anticipates that discretion on the part of reviewers, as long as it is useful and clear. At times, staff completing MORs need to use their best judgment to establish scores. HUD will continue to educate and guide CAs in their responsibilities to ensure MOR ratings are given with a holistic view of the property's performance. In response to these comments, HUD ensured that tracking compliance with new requirements through the Housing Opportunity Through Modernization Act of 2016 requirements are assessed equally among Owners and Agents of Section 8 housing.

Two commenters (NAHRO and SHCC) commented on the accuracy of the agency's estimate of the burden of the proposed collection of information. They noted that the burden hours should represent the complete time it takes to conduct an MOR from start (notification and desk review) to completion (corrective action and closure). The current burden hours on the form do not currently represent the amount of time required by either CAs preparing, conducting, completing and closing the MOR or the time required by Owners/Agents to supply information, meet with CA staff for the site visit, and respond to findings with corrective actions.

HUD Response: HUD has elected to retain the 8.33 burden hour estimate as it is anticipated that only 8.33 hours will be required to fill out the HUD-9834 form on its own. Additionally, the Department understands that this figure represents only an average of the time it takes to complete HUD-9834.

One commentor (SHCC) noted that the MOR Final Rule reiterated a requirement from Chapter 6 of HUD Handbook 4350.1 that an MOR be performed within 6 months following a change in ownership or management. The commentor believed it to be a useful idea; however, in order to ensure that the MOR captures mainly information that assesses the new Owner/Agent (O/A), rather than that of the former Owner/Agent, a modified time frame of within 9 months after the change in ownership or management may better capture this information.

HUD Response: This is helpful feedback from the commentor, but the intent of this information collection is to alter the contents of the HUD-9834. Chapter 6 of HUD Handbook 4350.1 and other guidance is undergoing a separate review—different from that of what is contained information collection. All the same, HUD has taken this comment into consideration.

(4) Changes or additions to HUD-9834

Two commenters (NAHRO and SHCC) expressed concern that collecting information through the HUD-9834 is not uniform, as there is a gap of subjectivity in MORs performed by CAs.

HUD Response: HUD anticipates that reviewers will exercise discretion when necessary, provided that such discretion is reasonable, useful, and clearly applied. At times, staff conducting MORs must use their best professional judgment when assigning scores. HUD will continue to educate and provide guidance to CAs on their responsibilities to ensure that MOR ratings reflect a holistic assessment of a property's overall performance. In response to these comments, HUD has clarified that compliance with the new requirements established under the Housing Opportunity Through Modernization Act of 2016 will be assessed consistently and equitably across Owners and Agents of Section 8 housing.

For example, HUD has implemented the asset limitation provision of the Housing Opportunity Through Modernization Act of 2016 as part of the compliance review of the MOR. As of the implementation of this law, a resident who owns assets up to \$100,000 of assets is not eligible for housing. As part of the revised HUD-9834, to ensure that Owners and Agents of Section 8 housing are compliant with this provision in the HUD-9834, this provision has been included.

Three commenters (LHAC, SHCC, and NAHRO) questioned whether updates to the Housing Opportunity Through Modernization Act of 2016 will have significant impact on the HUD-9834.

HUD Response: Among other updates to this information collection, it is with the intent that the Department updated the HUD 9834 to comply with the Housing Opportunity Through Modernization Act of 2016. For example, Effective January 1, 2024, the elderly/disabled family deduction increases from \$400 to \$525 and applies to a family's next interim or annual reexamination, whichever is sooner, after the date on which the Owner or Agent implements the new elderly/disabled family deduction.

HUD has made the necessary update to the HUD-9834 to accommodate this change in the regulation and guidance set forth in the HUD-9834. Moving forward, the CA will ensure that the deduction is properly applied to the family's adjusted annual income when determining the tenant's monthly

payment of rent. If HUD did not make this adjustment, then the Department and Owner or Agent would, to an almost certain degree, submit improper payments of subsidy.

One commentor (CMS) asked if HUD considered adding a VAWA lease addendum to the HUD-9834.

HUD Response: HUD has recognized the requirement for VAWA-related changes and has taken this comment into consideration. For example, HUD has added a new attachment to the HUD-9834 that ensures an Owner or Agent of Section 8 housing is compliant with the Violence Against Women Act. Within this attachment, a CA inquires if an Owner or Agent has written policies to allow for lease bifurcation to evict, remove, terminate occupancy rights, or terminate assistance to such member who engages in criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking against an affiliated individual or other individual.

The Violence Against Women Reauthorization Act of 2013 and the Violence Against Women Reauthorization Act of 2022 require HUD to implement protections for victims of domestic violence, dating violence, sexual assault, or stalking. HUD published its final rule implementing VAWA 2013 and, as a result, HUD developed and appended a VAWA lease addendum to this information collection package, incorporating VAWA protections into multifamily housing program leases.

For purposes of this collection, the VAWA lease addendum is specifically incorporated into this information collection for use in multifamily housing programs.

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

There are no gifts or payments of any kind given 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.

HUD-9834: Form HUD-9834 does not collect any personally identifiable information (PII) from tenants. Accordingly, no specific assurances of confidentiality are required beyond the standard safeguards HUD applies to program and project information.

HUD-91067: HUD does not promise confidentiality of the VAWA Lease Addendum. Any information provided to covered housing providers under 24 CFR 5.2007, including the fact that an applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, will be retained in confidence and not entered into any shared database nor provided to any related entity except when the disclosure is: consented to by the individual in writing, requiring for use in eviction proceedings, or otherwise required by law.

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.

HUD does not require the asking of private or sensitive questions of the respondents or third parties.

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.**

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hours Per Response	Annual Burden Hours	Hourly Cost per Response*****	Total Annual Cost
HUD-9834	27,127*	1**	27,127*****	8.33	225,968	\$39.77	8,986,744.00
HUD-91067	413,929	1***	413,929	.13	53,811	\$39.77	\$2,140,054.00
TOTALS	441,056		441,056		279,779		\$11,126,798.00

*Number of Owners/Agents is based on data obtained from HUD systems.

**The MORs Final Rule (published in June 2022) reduces the frequency of MORs for high-performing properties. Thus, the frequency now varies between 12 months and 36 months.

*** In practice, HUD-91067 is executed at initial lease signing and again at lease renewal. While renewal intervals may vary, HUD uses an annualized estimate to conservatively capture burden across all covered households. In the event of a new statutory requirement or form update, Owners/Agents may also be required to re-execute the addendum mid-lease.

*****Total number of responses is based on annual on-site reviews performed by CAs, HUD staff, and Lenders

*****Respondent cost is based on a mean hourly wage of \$39.77 for Property, Real Estate, and Community Association Managers (SOC Code 11-9141), as reported by the U.S. Bureau of Labor Statistics, Occupational Employment and Wage Statistics (OEWS), May 2025 National Occupational Employment and Wage Estimates. Note that the cost per hour may vary depending on locality.

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.

There are no additional capital or start-up costs. There are no total operation and maintenance purchase of services components required for the collection of this information.

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.

HUD-91067, VAWA Lease Addendum for Multifamily Housing Programs, does not generate additional costs to the Federal government. Execution and retention occur between owners/ agents and tenants as part of normal leasing practices. HUD provides the form in a fillable format but does not incur ongoing costs related to processing or review of the addenda.

Information	Number of	Frequency	Responses	Burden Hours	Annual Burden	Hourly Cost	Total Annual
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Collection	Respondents	of Response	Per Annum	Per Response	Hours	per Response	Cost
HUD-9834	27,127*	Varies**	27,127	0.33	8,952	\$36.64****	327,998.00
HUD-91067	413,929	Annually***	413,929	0	0	\$0	\$0
TOTALS	27,127		27,127		8,952		327,998.00

*The estimated number of respondents is based on the number of insured projects in HUD systems that are reviewed by HUD staff and must comply with the on-site management review requirements.

**The MORs Final Rule (published in June 2022) reduces the frequency of MORs for high-performing properties. Thus, the frequency now varies between 12 months and 36 months.

*** In practice, HUD-91067 is executed at initial lease signing and again at lease renewal. While renewal intervals may vary, HUD uses an annualized estimate to conservatively capture burden across all covered households. In the event of a new statutory requirement or form update, Owners/Agents may also be required to re-execute the addendum mid-lease.

**** GS Salary table 2026: Estimated cost per hour HUD staff (GS-12, Step 1) to review and process the documents for this collection.

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

Renewal, with a program change to incorporate form HUD-91067, VAWA Lease Addendum for Multifamily Housing Programs under this control number, of previously approved collection for which approval has expired. HUD-91067 VAWA Lease Addendum is being added to this collection to consolidate related multifamily management and occupancy instruments under a single collection. While this renewal reflects a program change (transfer and consolidation of HUD-91067, with assignment of a minimal burden estimate), it does not reflect substantive changes to the management review process and only modestly increases the overall annual burden hours.

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.

The results of this information collection will not be published. HUD- 9834 results are only shared with Owners/Agents. HUD-91067 is retained in tenant files and may be reviewed during monitoring or compliant investigations.

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 OMB approval expiration date will be displayed on both HUD-9834 and the lease addendum.

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

There are no exceptions to the certification statement.