

**Supporting Statement for Paperwork Reduction Act Submissions
(Alternative Inspections – Housing Choice Voucher Program)
(OMB# 2577-0287)**

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.

Section 8(o)(8) of the United States Housing Act of 1937 as amended sets out requirements for U.S. Housing and Urban Development (HUD) Housing Choice Voucher (HCV) program Public Housing Agency (PHA) for the inspection of voucher assisted unit. The 1937 Act requires PHAs to inspect voucher units prior to establishing Housing Assistance Payment (HAP) contracts to verify compliance with housing quality standards (HQS) established by the HUD Secretary to ensure safe and habitable housing. The units must also be re-inspected periodically to ensure continued compliance with HUD standards.

On January 17, 2014, Congress enacted the Consolidated Appropriations Act of 2014 (P.L. 113-76, approved January 17, 2014). Among other changes, under Section 220 of the Transportation, Housing and Urban Development, and Related Agencies Appropriations, Division L (**Exhibit A**), PHAs may streamline their inspection procedures for Housing Choice Voucher (HCV) units by using alternative inspection methods, as outlined in 24 CFR 982.406, Use of alternative inspections, to satisfy compliance with inspection requirements at 24 CFR 982.405(a) and 24 CFR 98.405(b) for initial and periodic inspections, respectively.

On March 8, 2016, the HUD published a final rule which among other things streamlined the administrative regulations at 24 CFR subpart I part 982. PHAs seeking to obtain approval to use inspections conducted for other federal, state, or local housing programs for their HCV units must submit information to HUD to affirm that their selected standards and methods provide the same or greater protection to occupants of dwelling units as the Housing Quality Standards (HQS). The amendments to 24 CFR 982.405(a), 24 CFR 982.405(b) and 24 CFR 982.406 (**Exhibit B**) provide that PHAs electing to use inspection methods and standards other than those used for housing assisted under the HOME Investment Partnerships (HOME) program, housing financed using Low-Income Housing Tax Credits (LIHTCs), or other inspections performed by HUD, must submit a copy of the inspection standards and an analysis of how those standards meet or exceed Housing Quality Standards (HQS) to HUD for approval. All requests for approval require the submission of supporting documents to HUD for review.

On May 11, 2023, HUD published the Implementation of National Standards for the Physical Inspection of Real Estate (NSPIRE) final rule introducing NSPIRE as the new physical inspection model for multiple HUD programs, including HCV. NSPIRE Standards replace HQS (as previously defined at 24 CFR 982.401) and the NSPIRE final rule (**Exhibit C**) adds reference to §982.406 with the addition of §5.703(g). Alternative inspection methods will now need to meet or exceed HQS as defined at 24 CFR 5.703 (NSPIRE Standards).

PHAs with approved alternative inspection standards must monitor changes to the standards and requirements of their method. If any changes are made, the PHA must submit to HUD a copy of their revised inspection standards and requirements along with a comparison to the HQS (as defined as NSPIRE Standards). If the PHA or HUD determines that updated inspection standards would cause the alternative inspection's requirements to no longer meet or exceed the requirements of HQS (as defined as NSPIRE Standards), the PHA may no longer use that alternative inspection method to satisfy inspection requirements outlined in 24 CFR 982.405(a), 24 CFR 982.405(b) for voucher units.

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.

Under the provisions of the Consolidated Appropriations Act of 2014 and as implemented by HUD in §982.406(a), PHA may comply with the inspection requirements in [24 CFR 982.405\(a\)](#) and [\(b\)](#) by relying on an alternative inspection (*i.e.*, an inspection conducted for another housing program) only if the PHA is able to obtain the results of the alternative inspection. The PHA may implement the use of alternative inspections for both initial and periodic inspections or may limit the use of alternative inspections to either initial or periodic inspections. The PHA may limit the use of alternative inspections to certain units, as provided in the PHA's Administrative Plan. To qualify, the alternative inspection must be one conducted pursuant to requirements under HOME, LIHTC, or another HUD-inspected housing program. Other alternative inspection methods that provide the same or greater protection to occupants of dwelling units as compared to HQS (as defined as NSPIRE Standards) may be used if the PHA submits the proper documentation to HUD and obtains approval. HUD determined approximately 1.15% of the 2,175 PHAs will make a request to HUD to use an alternative inspection method annually. The total number of PHAs included as a part of this information collection is smaller due to PHAs closing or merging with other PHAs.

A PHA that wants to rely on an alternative inspection method not mentioned in §982.406(c)(1), must submit the following to HUD for review:

- Email from the PHA requesting HUD authorization to use an alternative inspection method.
- A copy of the inspection method the PHA is requesting to use instead of current HUD HQS (as defined as NSPIRE Standards).
- An analysis of the alternative inspection method demonstrating how the alternative inspection method provides the same or greater protection to assisted occupants as would HQS (as defined as NSPIRE Standards).

A PHA using an approved alternative inspection method that determines there are any changes to their inspection standards or requirements must submit the following to HUD for review:

- Email from the PHA requesting HUD approval to continue with the revised alternative inspection method.
- A submission of the alternative inspection method the PHA is requesting to use for HQS inspections.

- An analysis showing how the alternative inspection method will meet or exceed all NSPIRE provides the same or greater protection to assisted occupants as would HQS (as defined as NSPIRE Standards).

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.

Alternative inspection method requests submitted to HUD are not collected by automation means. As outlined in the NSPIRE Administrative Procedures Notice for the Housing Choice Voucher Programs, Revision 1 (**Exhibit D**), PHAs that want to rely on an alternative inspection method requiring HUD approval must be sent the request to REAC via email at NSPIREV_AlternateInspection@hud.gov with a courtesy copy to their Field Office representative.

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 will be no duplication of information. There is no similar information already available that may be used or modified for the purpose described in the response to question 2, above.

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

The information being collected has no significant impact on small businesses or other 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.

Submissions under this collection are at the option of each individual PHA. Should this collection not be conducted, a PHA would be unable to seek and obtain approval from HUD to use alternative inspection methods for HCV units as provided in HUD's streamlined regulations at §982.406.

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.

On September 18, 2025, HUD published the 60-Day Notice of Proposed Information Collection in the Federal Register (90 FR 45051) and the public comment period closed on November 17, 2025. One comment was received on this on proposed information collection during the comment period.

Comment: One commenter inquired about obtaining a copy of the proposed change to the form.

HUD Response: There is no form associated with this information collection. Thank you for your comment.

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

Not Applicable

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.

The information being collected does not include any personally identifiable information, so confidentiality is neither provided nor needed.

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 sensitive questions are being asked.

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.**

The estimated burden hour calculations for tasks performed by PHAs seeking to use alternative inspection methods under §982.406 are shown by the type of task involved in the process. The annual burden hours are calculated using the anticipated number of response/requests HUD will receive from PHAs with HCV programs that will seek approval to implement an alternative inspection method. HUD determined approximately 1.15% of the 2,175 PHAs will make a request to HUD to use an alternative inspection method annually. The total number of PHAs included as a part of this information collection is smaller due to PHAs closing or merging with other PHAs.

The estimated annual cost to respondents to apply for and maintain HUD approval for the use of alternative inspection methods is provided in the table below is based on the U.S. Bureau of Labor Statics Occupational Employment and Wages for 2024 [Property, Real Estate and Community Association Managers for May 2024](#). Based on this information, PHA staff's annual salary is \$82,720 with a mean hourly wage of \$ 39.77.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Initial email submission for HUD approval to use alternative inspection method	50	1	50	5	250	\$39.77	\$9,942.50
Email submission for HUD approval to continue using alternative inspection method after modifications	15	1	15	3	45	\$39.77	\$1,789.50
Total	65		65		295		\$11,732.15

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 costs to respondents.

- 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.**

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
HUD Staff Review of Initial email submissions for HUD approval to use alternative inspection method	50	1	50	3	150	\$50.49	\$7,573.50
HUD Staff Review of email submissions to continue using alternative inspection method after modifications	15	1	15	3	45	\$50.49	\$2,272.05
Total	65		65		195		\$9,845.55

The estimated annualized costs to the federal government for the collection of alternative inspection methods are based on the Rest of U.S. 2025 general pay schedule for a GS-13/1 rate, which is \$105,383 annually, or \$50.49 per hour. A GS-13/1 salary is the average salary for the analyst(s) who will review the submissions.

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

There is an increase in the estimated burden hours for this information collection as we determined a revised number of PHAs that may submit a request for alternative inspections methods to be 1.15 % of approximately 2,175 PHAs that administer the HCV Program due to the implementation of the NSPIRE Standards for HCV inspections. This information collection request is a reinstatement with change of a previously approved collection. The total dollar cost increased indicated in 12 and 14 due to increases in the General GS pay scales from 2019 to 2025.

- 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 information collected 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 is not seeking approval to not display the expiration date of the OMB approval.

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

There are no exceptions to the certification statement identified.

B. Collections of Information Employing Statistical Methods

Not applicable