

Supporting Statement for Paperwork Reduction Act Submissions
Family Self-Sufficiency
OMB Control No.: 2577-0178

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.**

The Family Self-Sufficiency (FSS) Program is authorized under Section 23 of the United States Housing Act of 1937 and re-authorized under Section 306 of the Economic Growth, Regulatory Relief, and Consumer Protection Act (P.L. 115-174) <https://www.law.cornell.edu/uscode/text/42/1437u> on May 24, 2018. The statute is implemented via regulations at 24 CFR 984 <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-IX/part-984#984.201>. The purpose of the FSS program is to develop local strategies to coordinate the use of public housing and Section 8 housing choice voucher (HCV) rental assistance and project-based rental assistance (PBRA) (AKA Multifamily) with support services provided by public and private resources to enable families to achieve economic independence and self-sufficiency. This collection is required to collect information for funding decisions, ensure that programs have policies and procedures that adhere to regulatory requirements and collect information on outcomes.

- 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.**

This is a reinstatement with changes to a previously approved collection for which approval has expired. The purpose of the FSS program is to develop local strategies to coordinate the use of public housing and Section 8 housing choice voucher (HCV) rental assistance and project-based rental assistance (PBRA) with support services provided by public and private resources to enable families to achieve economic independence and self-sufficiency. The collection is used to collect information for funding decisions, ensure that programs have policies and procedures that adhere to regulatory requirements and collect information on outcomes.

Each Public Housing Agency (PHA) or PBRA owner carrying out a local FSS Program must enter into a Contract of Participation (Form HUD-52650) with each eligible family that opts to participate in the program. The contract enumerates the services of the local FSS Program that are made available to tenants, as well as the responsibilities and obligations of the participating family. The Contract of Participation is required by law (Section 23(d) of the U. S. Housing Act of 1937, as added by Section 554 of the Cranston-Gonzales National Affordable Housing Act, P.L. 101-625) and Section 306 of the Economic Growth, Regulatory Relief, and Consumer Protection Act (P.L. 115-174). The Contracts of Participation are not submitted to HUD but must be kept on file.

Each PHA/PBRA owner that wishes to run an FSS program must consult with local officials to develop an FSS Action Plan containing descriptions of the size, characteristics, and needs of the population to be served by its proposed self-sufficiency program; the services and activities to be provided by both public and private resources to FSS families; how the program will be implemented; a time-table for implementation; a certification of coordination in the development of the services and activities; and other information necessary for HUD to determine the soundness of the PHA's/owner's proposed FSS program. The Plan will be submitted per guidance provided to HUD as required by law (Section 23 (h) of the U. S. Housing Act of 1937 as added by Section 554 of the Cranston-Gonzalez National Affordable Housing Act, P.L. 101-625) and Section 306 of the Economic Growth, Regulatory Relief, and Consumer Protection Act (P.L. 115-174). Once the Plan is approved, the field office will send an approval email and the Plan does not need to be re-submitted unless the PHA/owner wishes to make a change.

Submittal of annual reports to HUD is required by law (Section 23(m) of the U. S. Housing Act of 1937, as added by Section 554 of the Cranston-Gonzalez National Affordable Housing Act, P. L. 101-625) and Section 306 of the Economic Growth, Regulatory Relief, and Consumer Protection Act (P.L. 115-174). PHAs fulfill their annual FSS reporting requirements by completion of the FSS addendum to the Form HUD-50058 (HUD-50058, HUD-50058-MTW or HUD-50058-MTW-Expansion, depending on the type of PHA) and submission to the Public Housing Information Center (PIC) or subsequent system. The burden hours for the reporting through the HUD-50058 are covered under OMB control number 2577-0083. PBRA owners submit an annual PBRA FSS Reporting Tool (HUD-52653).

Applications have been streamlined to only require an SF-424, HUD-424B, HUD-52651 and a HUD-2880. Applicants submit an SF-LLL if applicable. We may have a narrative for all applicants in the future.

Burden hours for the SF-424, HUD-424-B, SF-LLL, HUD-50058 (including HUD-50058-MTW and HUD-50058-MTW-Expansion) and SF-425 are accounted for in separate collections.

All requirements listed under "Application" are received and reviewed pursuant to the FSS Funding Notice(s). The requirements under "Implementation" and "Reporting" are received and reviewed pursuant to FSS program grant agreement and guidance.

- 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.**

All application packages for funding of Family Self-Sufficiency coordinators are submitted to HUD electronically (currently via GrantSolutions) by PHAs/owners. In addition, information from each family's FSS Contract of Participation (HUD-52650), is submitted to HUD electronically by PHAs using the HUD-50058 (or HUD-50058-MTW or HUD-50058-MTW-Expansion), Family Report. PBRA owners submit the PBRA FSS Program Reporting tool annually.

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 effort. Information collected is unique to each participant and does not duplicate any similar information.

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. The burden associated with such collection of information is the minimum needed for program monitoring.

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.

Federal program requirements, policy activities and statutory mandates would not be met if the collection is not conducted or is conducted less frequently. This information must be collected so that funds for the salaries of FSS coordinators may be awarded timely to qualified applicants. Appropriations are made in one-year increments, so awards must be made on an annual basis.

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

None of these are applicable to this program

8. **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.*
- *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.*

In accordance with 5 CFR 1320.8(d), the agency's notice announcing this collection of information appeared in the Federal Register on 06/13/2025, (Volume 90, No 113, page 25070). The public was given until 08/12/2025, to submit comments on the proposed information. Three comments were received.

Positive Comment: One commenter supported the collection as being helpful for program and reporting purposes.

HUD Response: Thank you for your comment.

On enforcement of current regulations: The comment stated that tenants are being evicted for non-payment of rent even though the tenant is current on rent payments when payments are made but the PHA is abating payment to landlords due to landlords not repairing exigent conditions that cause the landlord to fail inspection. Regulations without enforcement are not helpful.

HUD Response: Enforcement of regulations regarding admissions and continued occupancy are beyond the scope of this proposed information collection.

On availability of resources: The comment stated, "There are very few resources available to disabled persons that are not elderly or children. Most assistance programs target minorities leaving the MAJORITY with no assistance resources.... This is not equity OR equality and to say that certain minorities have more rights for any reason is a form of discrimination and should be against the LAW."

HUD Response: The Family Self-Sufficiency program is open to all residents of HUD-assisted housing (public housing, vouchers or project-based rental assistance) with motivation being the only screening element allowed. Availability of other resources outside of FSS is beyond the scope of this proposed information collection.

On burden of information collection to individuals. The comment stated that it is burdensome for individuals to collect and submit their records and documentation of receipt of benefits from

other federal programs. The federal government should be able to access that information across agencies and systems.

HUD Response: The FSS program allows each FSS program to determine policies on the requirements for documentation of goal achievement at the local level. This must be included in the local FSS Action Plan. Collection of documentation outside of the FSS program is beyond the scope of this proposed information collection.

Additionally, the program office holds FSS Office Hours monthly and covers all manner of topics pertaining to the FSS program. Any feedback related to the application process, forms, and/or reporting, are taken under advisement.

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

No payments, gifts, or incentives are provided 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.

Assurance of confidentiality is neither provided nor needed. The Privacy Act of 1974 (Pub. L. No. 93-579, 88 Stat. 1896, 5 U.S.C. 552a) protects forms that include PII of program participants. The only form in this collection that is submitted with PII is the HUD-50058. Contract of Participation is not submitted to HUD, but information collected by the grantee is subject to the Privacy Act.

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.

This collection does not ask sensitive/private questions (sex, religion, etc). Data is limited to program participation and economic self-sufficiency goals.

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.

Information Collection	Number of Responses	Responses per Year	Total Annual Responses	Hours per Response	Total Hours	Cost per Hour	Annual Cost
Application							
SF-424 - Application for Federal Assistance* OMB Number: 4040-0004	1,000*	1*	1000*	0	0	0	0
HUD-424-B - Applicant and Recipient Assurances and Certifications* OMB Number 2510-0017	1,000*	1*	1000*	0	0	0	0
SF-LLL - Disclosure of Lobbying Activities* OMB Number: 4040-0013	40*	1*	40*	0	0	0	0
Applicant, Recipient, Disclosure, Update HUD Form -2880* OMB Number: 2501-0044	1,000*	1*	1000*	0	0	0	0
Program Narrative	1,000	1	1000	10	10000	\$45.14	\$ 451,400.00
FSS Application HUD-52651	1,000	1	1000	.0.5	500	\$45.14	\$ 22,570.00
Notice of Award and Terms & Conditions** (AKA Grant Agreement)	1,000**	1**	1000**	0	0	0	0
Implementation							
FSS Action Plan-New Grantees (if grants to new entities are made)	200	1	200	10	2000	\$45.14	\$ 90,280.00
Contract of Participation HUD-52650	1000	25	25000	1	25000	\$45.14	\$ 1,128,500.00
Cooperative Agreements	250	1	250	2	500	\$45.14	\$22,570.00
Reporting							
FSS Annual Survey HUD-52651-C	1000	1	1000	1	1000	\$45.14	\$45,140
Form HUD-50058 – Family Report (standard, MTW and MTW-expansion) OMB No. 2577-0083	800*	100*	80000*	0	0	0	0
FSS Monitoring Review Self-Assessment Checklist HUD-52651-B	800	0.2	160	2	320	\$45.14	\$14,444.80
PBRA FSS Reporting Tool HUD-52653	200	1	200	1	200	\$45.14	\$9,028.00
SF-425 Federal Financial Report* OMB No. 4040-0014	1000*	1*	1000*	0	0	0	0
Total	5,450	31.2	28,810	27.5	39,520		\$1,782,932.80

Burden hours for forms showing zero burden hours in this collection are reflected in the OMB approval number cited or do not have a reportable burden. Additionally, numbers with an asterisk () next to them are not calculated in the total estimate displayed in the last row in the above table because they are captured in a different information collection.

**HUD-1044, Award/Amendment is completed by HUD staff, signed by the recipient of the grant, and returned to HUD. This form is a certification, and HUD ascribes no burden to its use.

The total annual burden of this collection is expected to be 39,520 hours. The total estimated annual cost for this information collection is **\$1,782,932.80**. To estimate the hourly cost per respondent, HUD used the Department of Labor Bureau of Labor Statistics' most recent (May 2024) data on the State and local government workers by occupational and industry group [Occupational Employment and Wage Statistics](#) we estimate these members of the Washington, DC metropolitan area Financial Specialists, All Other, professional series, to have an average hourly rate to be \$45.14.

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 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-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 other than the costs shown in Question 12.

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.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Action Plan	200	1	200	1	200	\$36.28	\$7,256
Annual Survey	1000	1	1000	0.25	250	\$36.28	\$9,070
Application	1000	1	1000	2	2000	\$36.28	\$72,560
Total			2200	3.25	2450		\$88,886

*Assumes an hourly rate at the **base pay** GS-12/Step1 level.

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

Reinstatement with changes of previously approved collection for which approval has expired. The numbers are based on the following assumptions. The numbers have increased due to increased funding. The requirements have not changed.

- Annual Applications/Grantees – 1000
 - PIH Applications/Grantees – 800
 - MF Applications/Grantees – 200
- Future new grantees – 200
- New Cooperative Agreements each year 250
- New participants each year 25,000
- Total participants each year 100,000
 - PIH participants 80,000
 - MF participants 20,000

- All applicants submit an SF-424, HUD-424B, HUD-52651 and a HUD-2880. They submit an SF-LLL if applicable. We may have a narrative for all applicants in the future.
- All new grantees submit an FSS Action Plan
- Every new participant requires a HUD-52650 Contract of Participation
- Every PIH participant is reported on the HUD-50058 (or HUD-50058-MTW or HUD-50058-MTW Expansion). Since there is no FSS Addendum on the HUD-50059, we don't use it. Instead, PBRA owners submit one PBRA FSS Reporting Tool (HUD-52653) each year.
- Every FSS program will complete an Annual Survey once per year.
- PIH will conduct a monitoring review of each program once every five years.

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 collection results will not be published; the funded grant awards will be published as required by the HUD Reform Act.

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 expiration date and the OMB approval number will be displayed in the Notice of Funding Opportunity and on all related forms.

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

This collection of information does not employ statistical methods.