

Supporting Statement for Paperwork Reduction Act Submissions
Annual MTW Plan and Report Elements, MTW Plan-Expansion
OMB Control No.: 2577-0216

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 following information collections are required to administer the Moving to Work (MTW) demonstration program.

The MTW demonstration was first established under Section 204 of Title II of section 101(e) of the Omnibus Consolidated Rescissions and Appropriations Act of 1996, Public Law 104-134, 110 Stat. 1321–281; 42 U.S.C. 1437f note (1996 MTW Statute). In 2016, the MTW demonstration program was expanded pursuant to Section 239 of the Fiscal Year 2016 Appropriations Act, P.L. 114-113 (2016 MTW Expansion Statute).

All public housing agencies (PHA) are required to submit a five (5) year plan and annual plans as stated in Section 5A of the 1937 Act, as amended. MTW PHAs designated prior to 2016 (Initial MTW PHAs) that are subject to the Standard MTW Agreement, are required to submit the Annual MTW Plan and Annual MTW Report Elements (also known as the HUD Form 50900) in lieu of the standard annual and 5-year PHA plans. MTW PHAs designated after 2016 or that have transitioned off of the Standard MTW Agreement (Expansion MTW PHAs) that are subject to the MTW Operations Notice, are required to submit the MTW Plan-Expansion (also known as the HUD Form 50900-EXPANSION) in addition to the standard annual and 5-year PHA plans.

The HUD Form 50900 and the HUD Form 50900-EXPANSION contain important information regarding the MTW PHA's upcoming MTW activities and a retrospective look back at the MTW PHA's preceding fiscal year (FY). HUD collects the information in these forms in order to track the prevalence of MTW activities, accurately and timely respond to congressional and other inquiries, and identify promising practices learned through the MTW demonstration.

The HUD Form 50900-EXPANSION was previously called the "MTW Supplement to the Annual PHA Plan" (HUD Form 50075-MTW under OMB No. 2577-0226). In order to streamline administration of this collection, it is being renamed and moved under OMB. No. 2577-0216. Revisions are also being made to the HUD Form 50900-EXPANSION to reduce the reporting and administrative burden on Expansion MTW PHAs. Many core questions and all custom questions within the HUD Form 50900-Expansion that were previously required for MTW activities will be eliminated. In addition to eliminating these previously required questions, other sections will be streamlined where information is already verified through existing certifications and HUD systems. This will reduce burden on Expansion MTW PHAs.

No revisions are being made to the HUD Form 50900 for Initial MTW PHAs.

The 2016 MTW Expansion Statute authorized an additional 100 MTW slots and additional slots may be added through future appropriations acts. Eligible applicants interested in obtaining MTW designation are required to submit applications to HUD, as explained in the applicable HUD

Notice. The information collection covers the information needed from applicants to determine which applicants should be selected. The information provided demonstrates the applicants' plans to implement a local MTW program and includes related applicant history. The application includes such information as narrative exhibits, certifications, data forms, and supporting documentation. The information will be used by HUD staff to evaluate threshold requirements and review applications.

- 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.**

As indicated above, the information collection is used by HUD to track the prevalence of MTW activities, accurately and timely respond to congressional and other inquiries, and identify promising practices learned through the MTW demonstration. The collection also serves to inform HUD, residents of the MTW PHA, and the public of the MTW PHA's mission for serving the needs of low-income and very low-income families, and the MTW PHA's strategy for addressing those needs.

- 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.**

MTW PHAs will submit electronic copies of the collection to HUD. After receipt and review, the documents are posted to the MTW website within the PIH HUD website, as available.

- 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 this collection and to each MTW PHA and does not duplicate any similar information or method.

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

This information collection has no impact on small businesses or other 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.**

The 1996 MTW Statute requires each MTW PHA participating in MTW, both Initial MTW PHAs and Expansion MTW PHAs, to keep records and submit reports to HUD that document the MTW PHA's use of program funds, provide data to assist HUD in assessing the MTW demonstration, and describe and analyze the effect of the MTW PHA's MTW activities.

The Federal statutory mandate contained in the 1996 MTW Statute would not be met if the collection were not conducted on an annual basis. The information collection is necessary to the continuation of the MTW demonstration.

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

No special circumstances are applicable to this collection.

- **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 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.

HUD published a Notice of Proposed Information Collection for Public Comments in the *Federal Register*, Volume 90; No. 169 Page 42772, on September 4, 2025, to submit comments on the proposed information collection. HUD received nine comments on this proposed collection.

On the Need to Increase Data Collection and Transparency for the MTW Plan Expansion:

The commenter urges that additional data be collected by MTW Expansion PHAs. Specifically, the commenter requests narrative information for each waiver and associated activity.

HUD Response: Descriptions of MTW waivers and associated activities and their applicable safe harbors are described in the MTW Operations Notice, which is linked in the Form. HUD seeks to cease requiring these additional descriptions to prevent redundancy. To the extent an MTW Expansion PHA seeks to go beyond applicable safe harbors, they would be required to provide additional description.

On the Need to Collect Information on Public Comments for the MTW Plan Expansion: The commenter urges HUD to maintain required information on public comments.

HUD Response: MTW Expansion PHAs certify in the “Certifications of Compliance” section that public process requirements have been met. To further ensure the extent to which this occurs, additional entries have been added on public comments and the required public process to ensure these requirements are met.

On Maintaining the Evaluations Section for the MTW Plan Expansion: The commenter urges HUD to maintain the evaluations section of the MTW Plan Expansion.

HUD Response: For MTW Expansion PHAs, all required evaluation is conducted through HUD’s Office of Policy Development and Research (PD&R). PD&R provides the public with information on the evaluations it conducts, so to require that MTW Expansion PHAs also provide information was determined to be redundant.

Positive Comment on the MTW Funding Flexibility Section of the MTW Plan Expansion:

The commenter supports the “Planned Application of MTW Funding Flexibilities” Section.

HUD Response: Thank you for your comment.

On Allowing MTW Expansion PHAs an Additional Option for Safe Harbor Waivers in the MTW Plan Expansion: The commenter requests a third option beyond “yes/no” to the question of whether the PHA “meets all the associated Safe Harbors...for which the MTW Expansion Agency does not have a proposed or approved Safe Harbor Waiver” for PHAs seeking a Safe Harbor Waiver.

HUD Response: Per the information request, if the MTW Expansion PHA is seeking a Safe Harbor Waiver, they would be proposing a Safe Harbor Waiver. They would then input “no.”

On Allowing MTW Expansion PHAs to Skip the Entire Local-Non Traditional (LNT)

Section of the MTW Plan Expansion if it is Not Applicable: The commenter requests that MTW Expansion PHAs that do not have applicable LNT waivers and associated activities be able to skip the section in its entirety.

HUD Response: MTW Expansion PHAs may input “0” or “N/A” for fields as appropriate. This is explained in the instructions section.

On Capturing LNT Substantially the Same (STS) Information in the MTW Plan Expansion:

The commenter requests that additional unit information be collected for LNT development units in order to ensure proper calculation of the STS requirement.

HUD Response: LNT development units under waiver and associated activity 17.c are calculated by approximating a number of units compared to the investment of MTW funds. This process is explained in the MTW Operations Notice. The information collected in the LNT STS section collects the information necessary for this exercise.

On Capturing LNT Data in the MTW Plan Expansion: The commenter believes information in Section F and Section G on LNT development is redundant.

HUD Response: The information in Section F represents planned information and information on all completed projects, which is important to the analysis of that particular activity. The information in Section G represents actual information for the applicable calendar year that is necessary to conduct the STS analysis. This is clearly described in the instructions section. An additional qualifier was added to the table.

On the Certifications of Compliance: The commenter requests that HUD review the Certifications of Compliance to ensure they are consistent with MTW flexibility.

HUD Response: HUD has reviewed the Certifications of Compliance to ensure they are consistent with MTW flexibility.

- **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.**

Respondents of the information collection are encouraged to provide ongoing feedback regarding all elements of submission. Information on the forms has been included on HUD websites, along with final submissions from respondents.

- **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.**

Not Applicable.

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

No payments or gifts to respondents are provided.

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 are no assurances of confidentiality provided or needed for this collection.

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 for in the MTW plans and reports.

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**

We estimate that costs to the respondents to complete this information collection will not exceed those incurred by regular grant administration, planning and management and are expected to bring a cost savings to the respondents.

There are no current respondents in the application phase of the information collection. There are 39 respondents that submit only according to the 50900: “Annual MTW Plan and Report Elements.” There are 100 respondents that submit only according to the 50900-EXPANSION: “MTW Plan-Expansion.”

The mean wage rate for all of the respondents working on the collection of this information is \$60.59 (per the Administrative Services Manager category of the U.S. Bureau of Wage Statistics Occupational Employment and Wage Statistics Profiles at: <https://data.bls.gov/oesprofile/>). The 39 respondents that submit the 50900 and the 100 respondents that submit the 50900-EXPANSION spend a total of 9,570 hours for all responses. At the wage rate of \$60.59, this results in an annual cost of \$579,846.

The chart below outlines the burden associated with the various aspects of the MTW applications, Annual MTW Plans/Reports, and MTW Plans-Expansion.

Information Collection	Number of Respondents	Frequency of	Responses Per Annum	Burden Hour Per	Annual Burden	Hourly Cost Per	Annual Cost
------------------------	-----------------------	--------------	---------------------	-----------------	---------------	-----------------	-------------

		Responses		Response	Hours	Response	
Application	0	0	0	0	0	0	\$0
50900: "Annual MTW Plan and Report Elements"	39	2	78	115	8,970	\$62.44	\$560,087
50900-EXPANSION: "MTW Plan-Expansion"	100	1	100	6	600	\$62.44	\$37,464
Totals	139	3	178	121	9,570	\$62.44	\$597,551

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).

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.

We do not estimate that there will be any additional costs to the Federal government for any of this information collection. Staff assigned to review the MTW applications, Annual MTW Plans/Reports, and MTW Plans-Expansion would have previously been reviewing the five (5) year plan and standard PHA plan for each of these sites in addition to specific information about the local MTW programs. The average grade for the staff working on MTW is GS-13, and they spend approximately 20 hours for each response reviewing and exchanging information with the respondents that submit only according to the 50900: "Annual MTW Plan and Report Elements" and 5 hours reviewing and exchanging information with the 100 respondents that submit only according to the 50900-EXPANSION: "MTW Plan-Expansion." This translates to 1,560 total hours for the Annual MTW Plan and Report Elements and 500 total hours for the MTW Plan-Expansions, for a total of 2,060 hours for all responses. At the average wage of a GS-13(step 5) - \$66.14 per hour Washington-Baltimore-Arlington, DC-MD-VA-WV-PA, the results in a total cost of \$136,248.

Again, there are 39 respondents that submit only according to the 50900: "Annual MTW Plan and Report Elements." There are 100 respondents that submit only according to the 50900-EXPANSION: "MTW Plan-Expansion."

Information Collection	Number of Respondents	Frequency of Responses	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Application	0	0	0	0	0	0	\$0
50900: "Annual MTW Plan and Report Elements"	39	2	78	20	1,560	\$66.14	\$103,178
50900-EXPANSION: "MTW Plan-Expansion"	100	1	100	5	500	\$66.14	\$333,070
Totals	139	3	178	25	2,060	\$66.14	\$136,248

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

the Supporting Statement.

This is a revision of a currently approved collection. Through this revision, HUD is adjusting the total burden hours estimate to account for the addition of the “MTW Plan-Expansion” Form to this collection.

The HUD Form 50900-EXPANSION was previously called the “MTW Supplement to the Annual PHA Plan” (HUD Form 50075-MTW under OMB No. 2577-0226). In order to streamline administration of this collection, it is being renamed and moved under OMB. No. 2577-0216 so that all MTW PHAs can be centrally administered. Therefore, while the burden hours of this collection will be increased, a correlating decrease will be realized in the other collection.

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 collection results are not tabulated and published in the traditional sense, however, Annual MTW Plans, Annual MTW Reports, and MTW Plans-Expansion are converted to Adobe Acrobat files and posted to the MTW website on an ongoing basis as available, as they are submitted.

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 number and date will appear on the HUD-prescribed forms.

18. Explain each exception to the certification statement.

There is no exception to the certification statement.