Supporting Statement for Paperwork Reduction Act Submissions

Capital Fund High Risk/Receivership/Substandard/Troubled Program

OMB# Control No.: 2577-0301

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 is a reinstatement with change to a previously approved collection. The previously approved collection included both pre-award and post-award collection information. This supporting statement includes only post-award information for grantees awarded competitive funds under the Capital Fund Program, starting with the fiscal year (FY) 2024 Notice of Funding Opportunity (NOFO) number FR-6800-N-81. All pre-award information has been submitted under the Generic NOFO OMB Control Number 2501-0044. Post-award information includes annual financial and performance reporting, audits, and award closeout. Reporting also includes compliance with the Award Term in Appendix A of 2 CFR Part 170. Grantees must also adhere to the application submission requirements in the NOFO, including how use of funding the identified Asset Management Property (AMP) will improve the targeted AMP. Further, Grantees are required to maintain eligibility for the life of the award, including program-specific threshold eligibility requirements. Failure to maintain eligibility requirements may result in termination of HUD funding.

   This burden includes making the information available to HUD for monitoring the performance of the grantees and ensuring compliance with all eligibility and administrative requirements. Authorization for the information collection includes Section 9 of the United States Housing Act of 1937 (42 U.S.C. 1437g) (1937 Act), Public Housing Capital Fund Program regulations (24 CFR Part 905) including relocation requirements (24 CFR Part 905, Subparts B and C). Activities under the NOFO are subject to 24 CFR Part 58 or 50 in accordance with 24 CFR 905.308(b)(2), 2 CFR Part 200, and authorized under the Consolidated Appropriations Act, 2024 (Public Law 118-42, approved March 9, 2024).

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 change to a previously approved collection. The previously approved collection included both pre-award and post-award collection information. This supporting statement includes post-award information only. All pre-award information has been submitted under the Generic NOFO OMB Control Number 2501-0044. As a result of the removal of pre-award information, the burden summary has significantly decreased from 110 respondents to 15 respondents and 680 burden hours to 10 burden hours. The narrative and form HUD-50075.1, Annual Statement/Budget, have been removed from this collection and is collected under the Generic NOFO OMB Control Number 2501-0044.

In FY2024, funding of approximately $12,500,000 was publicly announced via the subject NOFO. HUD made approximately five (5) awards, with a minimum award amount of $250,000 and a maximum award amount of $3,000,000.

To measure the effectiveness of funding, HUD will assess physical inspection scores and occupancy data of the grantees throughout the grant period. Grantees are required to submit obligation documents (signed contracts) and expenditure documentation (e.g., invoices) to the local field office.

Post-award reporting requires PHAs awarded under this program to use Energy Performance Information Center (EPIC) to complete annual reports within 60 days of each annual anniversary of award.

A Final Performance and Evaluation report is required at the end of the grant performance period prior to grant closeout. This report documents accomplishments and assesses effectiveness of the grant activities. The report is generated and submitted in EPIC. HUD may request periodic reports throughout the grant period.

PHAs are required to submit an Actual Modernization Cost Certificate in EPIC prior to grant closeout. The purpose is to report final, audited expenses for modernization projects. This was formerly collected on form HUD-53001, but the data is now collected electronically in EPIC. All other reporting (e.g. in financial systems) already required in the Capital Fund formula grant program or the Moving to Work program shall continue to apply.

If a PHA is unable to complete any EPIC-related reports or data input due to technological difficulties, it can contact the Field Office or PIHOCI@hud.gov and HUD staff will upload the information on the PHA's behalf.

Grantees are expected to use Standard Form 425, Federal Financial Report, to provide comprehensive financial accounting of federal grant funds, to report project performance for the costs that are billed, and whether on track to complete the project as described in the application. This performance data is required by 2 CFR 200.329 (https://www.ecfr.gov/current/title-2/section-200.329).

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.**

For purposes of this collection, the field office is responsible for the review of the documentation to ensure compliance with the conditions of the award and approve the payment voucher requests to grant recipients through HUD's electronic Line of Credit Control System (eLOCCS).

The PHA is required to maintain a file with sufficient back-up documentation to support the payment request voucher. The PHA has a direct deposit form SF-1199A on file with the HUD Fort Worth Accounting Center with the banking information for the account to which the funds are deposited 2-3 business days after the voucher is submitted in LOCCS. PHAs report progress related to this grant on a quarterly basis. Required reports, including the SF-425 Federal Financial Report, are submitted electronically via email to PIHOCI@hud.gov.

HUD electronically collects public housing finance, inventory and development data from the PHAs through its Public Housing Portal via Secure Systems, an automated database system. This data is reported under other collection numbers throughout HUD's Office of Public and Indian Housing. Some of this data is used by the Capital Fund Program to determine the amount of funding that each PHA should receive through annual formula grants. HUD is now requiring each PHA to certify the accuracy and timeliness of the data that they submitted. This certification is also collected electronically.

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.

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

   The collection of information **does not** impact small businesses or other small entities.

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.**

   If the collection is not conducted and not done so in accordance with 2 CFR 200, the unintended misuse of Congressionally appropriated federal dollars intended to improve public housing assets in receivership, designated troubled or substandard, or otherwise is probable.

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; **Not Applicable** or

- 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. **Not Applicable**

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.**

   In accordance with 5 CFR 1320.8(d), the agency's notice announcing this collection of information appeared in the Federal Register on June 26, 2025, (Volume 90, No 121, page 27333). The public was given until August 25, 2025, to submit comments on the proposed information. no comment(s) were received.

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

   No payment or gift is 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.**

PHAs may be required to provide vouchers to relocate affected tenants during the repair of units. Most PHAs use an internal software system to track and monitor relocation efforts. This information collection, however, **does not** collect individual or personal information; therefore, it does not require a system of records notice or privacy impact assessment.

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 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 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.

The table below assumes a Management Analyst individual, at an hourly rate of $55.15 at the Federal, State and Local government level, excluding State and Local Government Schools and Hospitals and the U.S. Postal Service. The total annual burden of this collection is expected to be ten (10) hours. The total estimated annual cost for this information collection is $551.50. To estimate the hourly cost per respondent, HUD used the Department of Labor, Bureau of Labor Statistics' Occupational Employment and Wage rate (Management Analyst) in 2024 (the most recently published) https://data.bls.gov/oesprofile/.

Information Collection	Number of Respondents	Frequency of Response per Respondents	Total Annual Responses	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Annual SF-425, Federal Financial	5	4	20	0	0	55.15	0

Report							
SF-1199A, Direct Deposit Sign-up Form	5	1	5	0	0	55.15	0
Post Award Reporting	5	1	5	2	10	55.15	551.50
Totals	15		30		10		$551.50

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 is no additional cost for 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.**

    The estimated annualized cost to the Federal Government is based on the hourly rate of $68.96 of the 2026 Pay Scale for a GS 14, Step 1, Management Analyst, which represents the staff of HUD's Office of Public Housing Investments (OPHI). This office primarily administers the Capital Fund Program, and both administers and implements the Capital Fund Financing Program, and Mixed-Finance transactions for the Capital Fund, Capital Fund Financing, and HOPE VI Programs.

Information Collection	Number of Respondents	Frequency of Response per Respondents	Total Annual Responses	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
SF-1199A	5	1	5	1	5	68.96	344.80
Post-award reporting	5	1	5	2	10	68.96	689.60
Totals	10		10		15		$ 1,034.40

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

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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.**

    This information 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.**

    No request is made not to display the expiration date.

18. **Explain each exception to the certification statement identified.**

    There are no exceptions to the certification statement.