**Supporting Statement for Paperwork Reduction Act Submissions**
**Housing Opportunity Through Modernization Act of 2016 (HOTMA):**
**Public Housing Waiting List Data Collection Tool**
**(OMB Control# 2577-0302)**

## 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 annual reporting of the total number of families on the public housing waiting list is governed by section 16(a)(5)(E) of the United States Housing Act of 1937 (42 U.S.C. 1437n(a)(5)(E)), as added by section 103 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA)):

   > (E) REPORTS ON OVER-INCOME FAMILIES AND WAITING LISTS.—The Secretary shall
   > require that each public housing agency shall—
   > (i) submit a report annually, in a format required by the Secretary, that specifies—
   > (I) the number of families residing, as of the end of the year for which the report is submitted, in public housing administered by the agency who had incomes exceeding the applicable income limitation under subparagraph (C); and
   > (II) the number of families, as of the end of such year, on the waiting lists for admission to public housing projects of the agency; and
   > (ii) make the information reported pursuant to clause (i) publicly available.

   The regulations covering the reporting requirements were published in Federal Register Notice 88 FR 9600 on February 14, 2023. Each public housing agency (PHAs) with a public housing program must submit a report annually to HUD that specifies, as of the end of the year, the number of families residing in public housing with incomes exceeding the over-income limit and the number of families on the waiting lists for admission to a public housing development and provide any other information regarding over-income families requested by HUD. These reports must be made publicly available.

   PHAs will only need to submit data on the number of families on the waiting lists for admission. HUD has developed an electronic tool for the collection of waiting list data and a screen shot has been included for illustration purposes (the calendar year dates will be updated each year). Once this data is received, HUD will make these reports public.

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 submission is a revision of a currently approved collection (OMB Control #2577-0302). The data on the total number of unduplicated families on the public housing waiting list will be provided by PHAs with public housing programs in the aggregate and no personally identifiable information will be collected. The information collected on the number of families on the waiting lists for admission to a public housing development will be used by HUD to create a publicly available annual report that also includes the number of families residing in public housing with incomes exceeding the over-income limit as required by the HOTMA statute.

The information in this collection is submitted 100% electronically in accordance with PIH Notice 2023-03, “this data must be submitted via a new electronic data collection tool that has been developed in the Operating Fund Web portal.” PHAs with a public housing program are notified by HUD at the beginning of the year to submit their public housing waiting list data through the Public Housing Portal. The PHA then uploads the waiting list data by any authorized PHA official but requires the electronic signature of the Executive Director.

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.

   The collection of information on the total number of families on the waiting list involves the use of an existing HUD IT system called the Public Housing Portal. The reason for adopting an electronic collection method is to reduce the burden on PHAs. The information is being collected 100% electronically through the Public Housing Portal and can be performed online without ever having to print anything. PHAs can access the module for submitting their collection data, enter the applicable PHA waiting list data, and submit the waiting list data to HUD all through the dedicated Public Housing Waiting List module in the Public Housing Portal.

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 information (the Public Housing waiting list total) is maintained by individual PHAs and is not already available to HUD in the aggregate.

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

   This 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 or is conducted less frequently, HUD and PHAs would be out of compliance with the requirements of the HOTMA statute. The statute requires an annual report on the PHA waiting list which means that this reporting burden cannot be reduced.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner: **ANSWER ALL BULLETS INDIVIDUALLY**

   - 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.

   In accordance with 5 CFR 1320.8(d), the agency's notice announcing this collection of information appeared in the Federal Register on 09-15-2025, (Volume 90, No 44389, pages 44389-44390). The public was given until [Date], to submit comments on the proposed information. Four Comment(s) were received.

   **Positive Comment:** One commenter supported HUD's efforts to modernize and renew its data collection under HOTMA.

**HUD Response:** Thank you for your comment.

**On individuals applying for housing with higher incomes and disability-related needs:** The comment stated the collection information should consider higher incomes and those individuals with disability related needs.

**HUD Response:** The HOTMA Public Housing Waiting List data collection tool is exclusively designed to collect waiting list data from PHAs so that they remain in compliance with the reporting requirements of Section 103 of HOTMA. PHAs will only need to submit data on the number of families on the waiting lists for admission. The data on the total number of unduplicated families on the public housing waiting list will be provided by the PHA in the aggregate and no personally identifiable information will be collected.

**On adjusted housing allowance and waivers:** The comment requested an exemption to allow for an adjusted housing allowance and waiver for the housing rental costs.

**HUD Response:** The Public Housing Waiting List data collection does not allow for or consider waiver or exemption requests. This request is beyond the scope of the proposed information collection.

**On burden of collecting information from smaller PHAs:** The comment requested HUD consider conducting a stratified sample survey across small, medium, and large PHAs to evaluate actual staff time and resource costs needs to complete the data collection.

**HUD Response:** The estimated hour burden of the collection of information includes variance in PHA size and is an aggregated average.

**On disaggregated data:** The comment requests HUD publish an annual summary data of disaggregated data (race, ethnicity, disability status, etc.).

**HUD Response:** The annual reporting of the total number of families on the public housing waiting list is governed by section 16(a)(5)(E) of the United States Housing Act of 1937 (42 U.S.C. 1437n(a)(5)(E)), as added by section 103 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA)) and does not require disaggregated data.

**On publishing public dashboards with disaggregated waiting list data:** The comment requested HUD publish public dashboards with anonymized, geographically disaggregated waiting list data.

**HUD Response:** The information collected on the number of families on the waiting lists for admission to a public housing development, will be used by HUD to create a publicly available annual report that also includes the number of families residing in public housing with incomes exceeding the over-income limit as required by the HOTMA statute. The requested information does not include disaggregated data and is beyond the scope of statute.

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

   No payment or gifts were 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 for this information collection. The collection does not require a system of records notice (SORN) or privacy impact assessment (PIA). Information about public housing waiting lists from PHAs will be presented as aggregated information in a public document. No personal identifiable information is requested by respondents.

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.

    The are no questions of a sensitive nature that require additional justifications.

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 number of PHAs responding to the Public Housing Waiting List Collection Tool is 2,681. The estimated burden hour per response is one half hours based on the average time to gather the waiting list totals and submit the data to the Public Housing Portal. The hourly cost per response of $23.73 is based on the current U.S. Bureau of Labor Statistics Occupational Outlook Handbook median hourly pay for Secretaries and Administrative Assistants, Except Legal, Medical, and Executive.

| Information Collection | Number of Respondents | Frequency of Response | Responses Per Annum | Burden Hour Per Response | Annual Burden Hours | Hourly Cost Per Response | Annual Cost |
|---|---|---|---|---|---|---|---|
| **Public Housing Waiting List Data Collection Tool (Includes maintaining the data through the year in order calculate and submit at the end of the calendar year)** | 2,681 | 1 | 2,681 | .50 | 1341 | $23.73[1] | $31,822 |
| **Total** | 2,681 | 1 | 2,681 | .50 | 1341 | $23.73 | $31,822 |

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.

[1] The level of work required to complete this web-based tool is equivalent to the work performed by an Executive Assistant. The cost estimate provided in this table is based on the Bureau of Labor Statistics, U.S. Department of Labor, Occupational Outlook Handbook, Secretaries and Administrative Assistants, Except Legal, Medical, and Executive.

- 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 above 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 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 cost burden to the Federal government will primarily be in analyzing the number of families residing in public housing with incomes exceeding the over-income limit from HUD's Inventory Management System/PIH Information Center (IMS/PIC) system. This data will then be combined with the number of families on the waiting lists for admission to public housing projects as reported by the PHAs. HUD will make these reports publicly available.

Once all the data has been collected, a complete review and analysis requires an estimated 24 hours to create this annual report. This estimate includes the time HUD staff may need to consult with other offices in HUD for verification of the data. The 2026 national average HUD staff salary = $90,952 per year or $43.57 per hour.

Therefore, the estimated Annualized Costs to the Federal government is: 1 (report generated annually) x 24 hours = 24 hours of staff time 24 hours x $43.57 = $1,046

| Information Collection | Number of Respondents | Frequency of Response | Responses Per Annum | Burden Hour Per Response | Annual Burden Hours | Hourly Cost Per Response | Annual Cost |
|---|---|---|---|---|---|---|---|
| **Public Housing Waiting List Data Collection Tool** | **2,681** | **1** | **2,681** | **.0089** | **24** | **$43.57*** | **$1,046** |
| **TOTAL** | **2,681** | **1** | **2,681** | **.0089** | **24** | **$43.57** | **$1,046** |

*Based 2026 OPM Base GS Salary Table, GS-13, Step 1

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

This submission is a revision of a currently approved collection (OMB Control #2577-0302).The estimates of annualized costs to respondents for collections of information has changed since 2022 due an overall decrease in PHA developments through repositioning, an increase in in the hourly cost per response to reflect updated salaries, and an increase in the burden hours per response to reflect the comprehensive time to compile data and submit to HUD through the Public Housing Portal.

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.

    As required by HOTMA, these reports will be made public. HUD plans to publish the data as one report in an electronic format. PHAs will be given 90 days (Jan 1st – March 31st) to submit the total number of families on their waiting list as of December 31st of the previous year. Once tabulated internally, the report will be published on the HUD.gov website by April 30th annually.

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 expiration date will be displayed on all data collection instruments. No exceptions are requested.

18. Explain each exception to the certification statement.

    There are no exceptions to the certification statement.