Supporting Statement for Paperwork Reduction Act Submissions
Requirements for Designated Housing Projects
(OMB# 2577-0192)

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 collection of information is necessary if public housing agencies (PHAs) choose to designate public housing projects, or portions of public housing projects, for occupancy exclusively by disabled families, elderly families, or mixed populations of disabled families and elderly families. The legal requirements that necessitate the collection of this information are found in section 7 of the United States Housing Act of 1937 (42 U.S.C. 1437e) ("the Act"). A copy of the statute authorizing the collection of information is attached.

   Per section 7(a) of the Act, a PHA may designate public housing to subpopulations only if they have a Designated Housing Plan (DHP) in effect. The statute defines the information required to be in the original plan, the period plans are allowed to be in effect, the review process to be followed by the Department of Housing and Urban Development (HUD), and the process PHAs must follow for plan renewals. If a PHA chooses not to renew their DHP, the designated projects will revert to their original occupancy status.

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 request is a reinstatement with change. The information collected is summarized in Notice PIH 2005-2 (extended via Notice PIH 2021-01) and the DHP Guidebook and is used by HUD to determine if a PHA's DHP complies with statutory requirements found in section 7(d). Section 7(f)(2) states that PHAs may renew their initial plans after five years by submitting the needed information to HUD. Thereafter, they may renew their plans every two years. PHAs may also submit requests to amend their initial plan as needed.

   HUD's current process to review DHPs is described in Notice PIH 2005-2, which remains in effect per Notice PIH 2021-01. While the notice lists the required elements of a DHP, there is no official form, so HUD continues to review DHP submissions on an individual basis.

   PHAs submit written DHPs to HUD including the elements required by the statute. These plans are submitted via email to PIH.Designatedhousing@hud.gov. Per section 7(d) of the Act, the plan must contain the following elements as required by 42 U.S.C. 1437e(d):

"A plan under this subsection for designating a project (or portion of a project) for occupancy under subsection (a)(1) is a plan, prepared by the public housing agency for the project and submitted to the Secretary, that—

(1) establishes that the designation of the project is necessary—

(A) to achieve the housing goals for the jurisdiction under the comprehensive housing affordability strategy under section 12705 of this title; and

(B) to meet the housing needs of the low-income population of the jurisdiction; and

(2) includes a description of—

(A) the project (or portion of a project) to be designated;

(B) the types of tenants for which the project is to be designated;

(C) any supportive services to be provided to tenants of the designated project (or portion);

(D) how the design and related facilities (as such term is defined in section 1701q(d)(8) 1 of title 12) of the project accommodate the special environmental needs of the intended occupants; and

(E) any plans to secure additional resources or housing assistance to provide assistance to families that may have been housed if occupancy in the project were not restricted pursuant to this section."

If approved by HUD, the DHP becomes an addendum to the PHA's Annual Plan.

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 is 100 percent electronic. The signature of the Executive Director is obtained via PDF and then submitted via email. None of the information needed for a DHP is available in HUD systems and so the exiting data is not a substitute for this collection. DHPs contain information about the PHA's developments, tenant body, and waiting list that the PHA has gathered already as part of its day-to-day operations. Most of these records are maintained electronically at the PHA. The other information the DHP needs (e.g., excerpts from the local jurisdiction's comprehensive housing affordability strategy (Consolidated Plan) and alternative resources for non-designated families) can be obtained from other local public or private organizations. PIH accepts only electronic (email) submissions at PIH.Designatedhousing@hud.gov. HUD considered the use of information technology in developing this collection and determined that electronic submission is the most effective means of reducing respondent burden. Because PHAs already maintain the underlying development, tenant, and waiting list data in electronic form, requiring electronic (rather than paper) submission avoids duplicative data entry and allows PHAs to compile and transmit the DHP using existing electronic records and files. Electronic submission also eliminates mailing and printing costs, reduces processing and review time for both PHAs and HUD, and allows for faster confirmation of receipt. HUD did not identify a more burden-reducing alternative (such as a dedicated online portal or system-to-system data transfer) that would be cost-effective given the relatively low frequency and volume of DHP submissions.

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.

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

   The collection does not impact small businesses.

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.**

   A PHA wishing to designate housing for a specific population is required by section 7 to submit a plan to HUD. If plans were not accepted, HUD would not be able to determine if a PHA's housing designation complies with statutory requirements or is consistent with the local jurisdiction's comprehensive housing affordability strategy (Consolidated Plan). The initial plan is submitted once and, therefore, cannot be submitted less frequently.

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.**

     Not applicable.

   - **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.

     In accordance with 5 CFR 1320.8(d), the agency's notice announcing this collection of information appeared in the Federal Register on May 5, 2026. The notice provides a 60-day period for public comments, and comments were due on July 6, 2026. HUD received no comments.

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

   There are no payments or gifts 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 collection. No SORN or PIA applies.

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 collection does not include any questions of a sensitive nature.

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.**

  See table below.

- **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**

  See table below.

- **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.** See table below.

The burden is determined by using the number of PHAs requesting a new designation in fiscal year 2025. This number varies annually, as not every PHA chooses to request or renew the designation. Additionally, once approved, plans are then renewed every two years from the initial effective date. As these dates vary among PHAs, submissions are staggered. The estimate that a new or amendment request takes 15 hours is based on observation that most submitted plans are amendments to existing ones and that PHAs already have the necessary data available to provide responses relevant to this information collection.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Avg. Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
New/Amendment Request (2577-0192)	21	1	21	15 hours	315	$42.50*	$13,387.50
Renewal Request (2577-0192)	22	1	22	3 hours	66	$42.50	$2,805.00
Total	43	**1**	43	18 hours	381	$42.50	$16,192.50

* Hourly cost estimates are based on Bureau of Labor Statistics, Occupational Employment and Wage Statistics, most recent (May 2025) National Occupational Employment and Wage Estimates, SOC 13-1041 Compliance Officers reflecting the regulatory analysis, documentation, and federal compliance functions required to prepare and submit a Designated Housing Plan.

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;**

  There are no additional costs to respondents other than the costs shown in Question 12.

- **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.**

  N/A

- **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.**

  N/A

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.**

    Each DHP undergoes review by the Office of Public Housing Programs, Office of Field Operations, and the Office of Fair Housing and Equal Opportunity, both at Headquarters and in the field. In March 2023, the Office of Public Housing Programs introduced a DHP Management App to streamline and automate HUD's internal review process.

The review process encompasses several tasks: initiating review processing using the app, consulting with other HUD staff for analysis, preparing approval/disapproval letters, compiling a PHA profile with tenant data from the Information Management System/PIH Information Center (IMS/PIC), packaging HUD's response for signature, generating periodic status reports, reviewing materials prepared by analysts and support staff before signing the letter to the PHA, conducting administrative/operational activities, adjusting the number and type of designated units, completing assessments, and uploading supporting documents to the app, among others.

The app's automated features significantly reduce the time spent emailing reviewers by extracting contact information from a list and auto-filling the app, as well as generating email reminders and notifications. This efficiency enhancement has notably reduced the time needed to complete the review process.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Avg. Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
New/Amendment Requests	**21**	**1**	**21**	**14**	**294**	**$51.00***	**$14,994**
Renewals	**22**	**1**	**22**	**14**	**308**	**$51.00**	**$15,708**
Total	**43**	**1**	**43**	**28**	**602**	**$51.00**	**$30,702**

*Estimated HUD staff review cost is based on the most recent (January 2026) General Schedule pay table, Rest of U.S. locality rate, GS-13 Step 1, reflecting the typical grade level of federal policy analysts reviewing Designated Housing Plans.

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

    This request is a reinstatement with change. The burden table for respondents (item 12) and reviewers (item 14) are updated to the most recent data available from BLS.

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 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 will display the expiration date on the collection.

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

    There is no exception to the certification.