Supporting Statement for Paperwork Reduction Act Submissions

OMB Title: Section 8 Renewal Policy Guidebook

OMB Control Number: 2502–0587

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 *Section 8 Renewal Policy Guidebook* explains the various options available under the Multifamily Housing Reform and Affordability Act of 1997 (MAHRA) for the renewal of expiring project-based section 8 contracts, as implemented by HUD at 24 C.F.R. parts 401 and 402. The requirements associated with such renewals and related administrative policies make this collection of information necessary. There are six options, summarized below, each with its own eligibility requirements, among which an owner may choose, provided the contract is eligible. The renewal process results in issuance of a renewal contract that implements the statutory requirements relative to each of the six renewal options, which consist of the following:

   a. Option One (Mark-Up-To-Market). Option One consists of Option One-A (Entitlement Mark-Up-to-Market) and Option One-B (Discretionary Mark-Up-to Market), which are authorized under section 524(a)(4)(A) and section 524(a)(4)(C) of MAHRA, respectively. For eligible contracts, renewal rents are established at market level under a renewal contract with a minimum five-year term.

   b. Option Two (Contract Renewal for Other Projects with Current Rents at or Below Comparable Market Rents). Option Two is authorized under section 524(a)(4)(C) of MAHRA. For eligible contracts, renewal rents are adjusted by an operating cost adjustment factor or on the basis of a budget and are limited by the market level.

   c. Option Three (Referral to the Office of Recapitalization (Recap)). Option Three is authorized under sections 514 and 515 of MAHRA. Projects subject to an FHA-insured or HUD-held mortgage for which the rents exceed the level of comparable market rents are eligible for Mark-to-Market (M2M) debt-restructuring, which is administered by Recap. An owner must submit a form HUD–9624 specifying either Option 3A (Reduction of Section 8 Rents to Comparable Market Rents without Restructuring (Lite)) or an Option 3B (Restructure of the Mortgage and Reduction of Section 8 Rents to Comparable Market Rents (Full)). An Option 3A election must include an RCS. An owner may be issued an interim M2M HAP Contract (form HUD–9640 or form HUD–9641) at the current above-market rents for up to 1 year while their renewal request is being processed.

   d. Option Four (Renewal of Contracts for Exception Projects). Option Four is authorized under section 524(b)(1) of MAHRA. A project may establish eligibility for renewal under Option Four on the basis that (1) it is exempt from M2M debt-restructuring pursuant to section 515(h) of MAHRA or (2) it does not satisfy the definition of “eligible multifamily housing project” in

section 512(2). Renewal rents are the lesser of existing rents as multiplied by the operating cost adjustment factor or budget-based rents without any market limitation.

e. Option Five (Renewal of Portfolio Reengineering Demonstration or Preservation Projects). Option Five is authorized under section 524(e)(1) (Preservation Projects) and section 524(e)(2) (Demonstration Projects) of MAHRA. Owners requesting a renewal of a Portfolio Reengineering Demonstration or Preservation Project must indicate on the form HUD–9624 whether the project has had either a mortgage restructuring and/or had the rents reduced to market. If the project is a Preservation Project as defined by the Low-Income Housing Preservation and Resident Homeownership Act (LIHPRHA) or the Emergency Low Income Housing Preservation Homeownership Act (ELIHPA), the Owner must indicate such on the Contract Renewal Request form (form HUD–9624).

f. Option Six (Opt-Out). Instead of requesting renewal of a section 8 contract when it expires, an owner may opt out of the Section 8 program by complying with the notice requirement in section 8(c)(8) of the United States Housing Act of 1937 and with related requirements in Chapter Eleven.

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 revision of a currently approved collection. It includes 9 revised forms and 2 new forms, as described below. All of the forms in the information collection are associated with the adjustment, amendment, or renewal of Section 8 Project-Based Rental Assistance (PBRA) Housing Assistance Payments (HAP) contracts.

Revised Forms

a. Amendment to Project-Based Section 8 Housing Assistance Contract Pursuant to Section 8(bb)(1) of the United States Housing Act of 1937 (HUD–93185a; HUD–93185b). These forms are used in conjunction with transfers of budget authority as permitted under Section 8(bb) of the U.S. Housing Act of 1937. Budget authority is transferred from one contract to another, and both the sending and receiving contracts are amended via these forms.

b. Contract Renewal Request Form Multifamily Section 8 Contracts (form HUD–9624). Owners submit this form to HUD to indicate the option under which they wish to renew a PBRA HAP contract.

c. Letter to Owners/Agents (HUD–9626). This form is completed by the Contract Administrator and sent to the Owner of a project eligible for an operating cost adjustment factor (OCAF) rent increase under Option One or Option Three.

d. Request to Renew Using Fair Market Rents (FMRs) as Market Ceiling (HUD–9630). This form is used by an Owner who requests to renew under Option 2 using 75 percent of the Fair Market Rent (FMR) as a market rent ceiling in lieu of obtaining a Rent Comparability Study.

e. Project-Based Section 8 Contract Administration Consent to Assignment of HAP Contract as Security for Freddie Mac Financing (HUD–9648a). This form is used when the Owner of a project wishes to grant a security interest in a HAP Contract to a lender as security for a loan made by the lender to the Owner of the project, when the lender will assign the loan to Freddie Mac.

f. Project-Based Section 8 Contract Administration Consent to Assignment of HAP Contract to FNMA as Security for FNMA Credit Enhancement (HUD–9648d). This form is used when the Owner of a project wishes to grant a security interest in a HAP Contract to FNMA, as security for the obligations of the Owner to FNMA, when FNMA provides a credit enhancement to the Owner for the project.

g. Project-Based Section 8 Contract Administration Consent to Assignment of HAP Contract as Security for Financing (HUD–9649). This form is used when the Owner of a project wishes to grant a security interest in a HAP Contract to a lender as security for a loan made by the lender to the Owner with respect to the project.

h. Project-Based Section 8 Contract Administration Consent to Assignment of HAP Contract as Security for FNMA Financing (HUD–9651). This form is used when the Owner of a project wishes to grant a security interest in a HAP Contract to a lender as security for a loan made by the lender to the Owner of the project, when the lender will assign the loan to Fannie Mae.

New Forms

a. Project-Based Section 8 Contract Administration Consent to Assignment of HAP Contract to Freddie Mac as Security for Freddie Mac Credit Enhancement (HUD–9648b). This form is used when the Owner of a project wishes to grant a security interest in a HAP Contract to Freddie Mac, as security for the obligations of the Owner to Freddie Mac, when Freddie Mac provides a credit enhancement to the Owner for the project.

b. Project-Based Section 8 Contract Administration Consent to Assignment of HAP Contract as Security for Financing when HFA is Both Lender and Contract Administrator (HUD–9649b). This form is used when the Owner of a project wishes to grant a security interest in a HAP Contract to an HFA lender as security for a loan made by the HFA lender to the Owner with respect to the project, when the HFA is also the Contract Administrator.

Other Forms in the Collection (Unchanged)

a. Housing Assistance Payments Contract (HUD–52522a; HUD–52522b). These forms are Part I and Part II, respectively, of the HAP Contract that is used to renew a HAP Contract following a transfer of budget authority pursuant to Section 8(bb)(1) of the Act.

b. Assignment, Assumption, and Amendment of Section 8 Housing Assistance Payments Contract (HUD–5988). This form is used when a project assisted under a HAP contract is sold. It is used to transfer the HAP contract obligations from the Seller to the Buyer.

c. Use Agreement (HUD–90055). This Use Agreement requires the Owner, in exchange for increased rents to pay for repairs, to agree to maintain the project as affordable housing for 20 years.

d. Rent Comparability Grid (HUD–92273–S8). This form is used to determine HAP Contract rents via means of a Rent Comparability Study.

e. Project-Based Section 8 Housing Assistance Payments Addendum to Renewal Contract under Option One or Option Two for Capital Repairs and/or Acquisition Costs (HUD–93181). This addendum establishes the "As-Is" and "Post-Rehab" rents for a HAP Contract renewed under the Chapter 15 Capital Repairs Program.

f. Project-Based Section 8 Housing Assistance Payments Addendum to Renewal Contract under Option One or Option Two for Capital Repairs and/or Acquisition: Post-Rehabilitation Rents at Closing (HUD–93182). This addendum establishes the Pre-Rehabilitation and the Post-Rehabilitation rents for Capital Repairs and/or Acquisition for a contract renewed under Chapter Fifteen with Post-Rehabilitation rents at closing.

g. Rider to Original Section 8 Housing Assistance Payments Contract (HUD–93184). This rider effectuates the early termination of an original Section 8 contract so that the Owner may request renewal under MAHRA.

h. OCAF Rent Adjustment Worksheet (HUD–9625). This form must be completed to calculate the amount of the OCAF rent adjustment for projects eligible for this type of rent adjustment.

i. Letter to Owners/Agents (HUD–9627). This form is completed by the Contract Administrator and sent to the Owner of a project eligible for a budget-based rent increase or an OCAF rent increase under Option Two or Option Four.

j. Request to Renew Using Non–Section 8 Units in the Section 8 Project as a Market Rent Ceiling (HUD–9629). This form is used by an Owner who requests to renew under Option 2 using non–Section 8 units in the project as a market rent ceiling in lieu of obtaining a Rent Comparability Study.

k. Sample Use Agreement (HUD–9634). This Use Agreement is employed when a for-profit owner transfers a project to a not-for-profit owner and rents are marked up to market or when a not-for-profit owner receives a budget-based rent increase for capital repairs.

l. Projects Preparing a Budget-Based Rent Increase (HUD–9635). This form is used by an Owner to calculate the initial Owner equity in the project when preparing a request for a budget-based rent increase.

m. Project-Based Section 8 Housing Assistance Payments Basic Renewal Contract (HUD–9636). This form is the Section 8 contract that is used to renew a HAP contract for a 1-year term.

n. Project-Based Section 8 Housing Assistance Payments Basic Renewal Contract (HUD–9637). This form is the Section 8 contract that is used to renew a HAP contract for a term of 2 or more years.

o. Project-Based Section 8 Housing Assistance Payments Renewal Contract for Mark-Up-to-Market Project (HUD–9638). This form is the Section 8 contract that is used when project rents are being marked-up-to-market.

p. Project-Based Section 8 Housing Assistance Payments Preservation Renewal Contract (HUD–9639). This form is the Section 8 contract that is used for a Preservation project, under which an Owner receives rent benefits comparable to those provided under the Plan of Action in accordance with section 524(e)(1) of MAHRA.

q. Project-Based Section 8 Housing Assistance Payments Interim (Full) Mark-to-Market Renewal Contract (HUD–9640). This form is the Section 8 contract that is used for a project that is eligible for Mark-to-Market where debt restructuring is necessary. The renewal contract constitutes a binding commitment for purposes of Section 579(b) of MAHRA.

r. Project-Based Section 8 Housing Assistance Payments Interim (Lite) Mark-to-Market Renewal Contract (HUD–9641). This form is the Section 8 contract that is used for a project that is eligible for Mark-to-Market where the project will be viable without debt restructuring. The renewal contract constitutes a binding commitment for purposes of Section 579(b) of MAHRA.

s. Project-Based Section 8 Housing Assistance Payments Full Mark-to-Market Renewal Contract (HUD–9642). This form is the Section 8 contract that is used for a project where the debt has been restructured.

t. Project-Based Section 8 Housing Assistance Payments Watch List Renewal Contract (HUD–9643). This form is the Section 8 contract that is used for a project that initially entered into an interim contract (HUD–9641 or HUD–9642) but later elects not to restructure the debt.

u. Project-Based Section 8 Housing Assistance Payments Contract for Previous Mod Rehab Projects (HUD–9644). This form is the Section 8 contract that is used for a project formerly assisted under the Section 8 Moderate Rehabilitation program.

v. Housing Assistance Payments Program Housing Finance & Development Agencies Extension Amendment to Old Regulation State Agency Housing Assistance Payments Contract (HUD–9647). This form of Extension Amendment is used to extend the maximum total contract term of a HAP Contract originally entered by a Housing Finance Agency (HFA) and a Section 8 Owner to the date of the originally scheduled maturity date on the HFA permanent financing.

w. Consent to Assignment of Senior Preservation Rental Assistance Contract (SPRAC) as Security for Financing (HUD–9649a). This form is used when the Owner of a project wishes to grant a security interest in a SPRAC to a lender as security for a loan made by the lender to the Owner with respect to the project.

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.

Project Owners submit the information individually on an annual and case-by-case basis. Pursuant to Notice H 2020–10, owners, management agents, and Contract Administrators may complete the forms in electronic format; electronically sign documents; transmit completed forms through electronic means; and store completed forms in electronic files. Respondents access fillable PDF versions of the required forms (such as the form HUD–9624 or the assignment consent forms) directly through the public HUDClips Forms Library. To submit files, respondents access the specific electronic platform designated by their local HUD Field Office or Performance-Based Contract Administrator (PBCA). These designated systems usually include secure email networks, encrypted file transfer protocol (FTP) sites, or dedicated regional partner portals.

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.

   Documentation is submitted on a transaction-specific basis.

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

   This collection involves, but does not adversely affect, small for-profit and not-for-profit owners of HUD-assisted housing. HUD lacks the authority to change these requirements for small entities; use of the forms is required to obtain benefits.

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.

   This collection is necessary to ensure that contract rents are established, adjusted, and increased in compliance with statute and that HUD's interest in providing for the long-term preservation of affordable housing is protected. If this information collection is not conducted, or is conducted less frequently, HUD would be unable legally to renew expiring Housing Assistance Payments (HAP) contracts or process annual mandated rent adjustments. Without a timely renewal process assistance payments to owners would lapse, leading to widespread defaults on affordable housing properties and the potential displacement of low-income tenants. The Multifamily Assisted Housing Reform and Affordability Act of 1997 (MAHRA) legally mandates specific options and calculation methods for renewing expiring HAP contracts. HUD does not have the statutory authority to bypass these requirements or change the frequency of contract expiration cycles.

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;

     There is no requirement for respondents to report more frequently than quarterly.

   - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

     There is no requirement for respondents to prepare a written response to this collection in fewer than 30 days.

- requiring respondents to submit more than an original and two copies of any document;

  There is no requirement for respondents to submit more than an original and two copies of any document.

- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

  There is no requirement for respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

- 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;

  No statistical survey is involved in connection with this collection.

- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

  There is no use of a statistical data classifications with this collection.

- 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

  No authority established in statute or regulation supports a pledge of confidentiality.

- 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.

  There is no requirement for respondents to submit proprietary trade secrets or other confidential information.

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.

   In accordance with 5 C.F.R. § 1320.8 (Paperwork Reduction Act of 1995), HUD published a 60-Day Notice of Proposed Information Collection in the *Federal Register* on January 23, 2026 (Docket No. FR–7098–N–19; OMB Control No. 2502–0587), providing a 60-day period for public comments.

   - One comment was received from WhoPoo App; the topic of the comment (a request to dissolve the Federal Housing Administration “for ongoing 14th amendment violations and

discrimination against Americans on the basis of national origin") was unrelated to the information collection and therefore resulted in no changes to any of the forms.

- 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.

  n/a

- 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.

  n/a

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

   Respondents will not be provided any payment or gift.

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.

    HUD may disclose certain information to Federal, State, or local agencies when relevant to civil, criminal, or regulatory investigations and prosecutions. Information collected will not otherwise be disclosed or released outside of HUD, except as required and permitted by law. This data collection is covered under **HUD/MF–01: Integrated Real Estate Management System (iREMS)**. This SORN establishes the legal authority for maintaining the registry, defines the categories of individuals covered, and lists the strict "Routine Uses" under which HUD may share information with external regulatory or law enforcement bodies. A comprehensive iREMS Privacy Impact Assessment is maintained in compliance with the E-Government Act of 2002 and FISMA standards. The PIA identifies potential privacy risks regarding the transmission of electronic forms and certifies that the system uses sufficient data minimizing and masking techniques to shield sensitive organizational and personal identifiers. Individuals (such as project owners or key principals) have a statutory right under the Privacy Act of 1974 (5 U.S.C. § 552a) to request access to, and seek amendment of, their own records maintained within the iREMS system. The public may request these contract records under the Freedom of Information Act (5 U.S.C. § 552).

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 questions of a sensitive nature are included in this collection.

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.

Forms	Number of Respondents	Frequency of Response	Total Annual Responses	Burden Hours per Response	Total Annual Burden Hrs.	Hourly Cost to Public[1]	Total Annual Cost to Public
Housing Assistance Payments Contract (HUD–52522a and b)	20	1	20	0.50	10.00	$40.25	$402.50
Assignment, Assumption, and Amendment of Section 8 Housing Assistance Payments (HAP) Contract (HUD–5988)	3,555	1	3,555	0.50	1,777.50	$40.25	$71,544.38
Section 8 Use Agreement (HUD–90055)	75	1	75	0.50	37.50	$40.25	$1,509.38
Rent Comparability Grid (HUD–92273–S8)	950	1	950	1.00	950.00	$40.25	$38,237.50
Project-Based Section 8 Housing Assistance Payments: Addendum to Renewal Contract Under Option One or Option Two for Capital Repairs and/or Acquisition Costs (HUD–93181)	50	1	50	0.50	25.00	$40.25	$1,006.25
Project-Based Section 8 Housing Assistance Payments: Addendum to Renewal Contract Under Option One or Option Two for Capital Repairs and/or Acquisition — Post-Rehabilitation Rents at Closing (HUD–93182)	150	1	150	0.50	75.00	$40.25	$3,018.75
Rider to Original Section 8 Housing Assistance Payments Contract (HUD–93184)	20	1	20	0.50	10.00	$40.25	$402.50
Amendment to Project-Based Section 8 Housing	25	1	25	0.50	12.50	$40.25	$503.13

[1] Hourly estimates are based on Bureau of Labor Statistics May 2025 hourly median wage of Property, Real Estate, and Community Association Managers (Standard Occupational Classification Code 11–9141.

Assistance Payments Contract [Contract A1] Pursuant to Section 8(bb)(1) of the United States Housing Act of 1937 (HUD–93185a)							
Amendment to Project-Based Section 8 Housing Assistance Payments Contract [Contract B] Pursuant to Section 8(bb)(1) of the United States Housing Act of 1937 (HUD–93185b)	25	1	25	0.50	12.50	$40.25	$503.13
Contract Renewal Request Form (HUD-9624)	2,000	1	2,000	1.00	2,000.00	$40.25	$80,500.00
OCAF Rent Adjustment Worksheet (HUD-9625)	7,957	1	7,957	1.00	7,957.00	$40.25	$320,269.25
Letters to Owners/Agents: Option 1 and 3 (HUD–9626)	419	1	419	0.25	104.75	$40.25	$4,216.19
Letters to Owners/Agents: Option 2 and 4 (HUD–9627)	1,801	1	1,801	0.25	450.25	$40.25	$18,122.56
Request to Renew Using Non–Section 8 Units in the Section 8 Project as a Market Rent Ceiling (HUD–9629)	10	1	10	0.50	5.00	$40.25	$201.25
Request to Renew Using FMRs as Market Ceiling (HUD–9630)	88	1	88	0.50	44.00	$40.25	$1,771.00
Sample Use Agreement (HUD–9634)	55	1	55	0.50	27.50	$40.25	$1,106.88
Projects Preparing a Budget-Based Rent Increase (HUD–9635)	1,697	1	1,697	1.00	1,697.00	$40.25	$68,304.25
Project-Based Section 8 Housing Assistance Payments Basic Renewal Contract – One-Year Term (HUD–9636)	500	1	500	0.50	250.00	$40.25	$10,062.50
Project-Based Section 8 Housing Assistance Payments Basic Renewal Contract – Multi-Year Term (HUD–9637)	800	1	800	0.50	400.00	$40.25	$16,100.00
Project-Based Section 8 Housing Assistance Payments Renewal Contract for Mark-Up-To-Market Project (HUD–9638)	169	1	169	0.50	84.50	$40.25	$3,401.13
Project-Based Section 8 Housing Assistance Payments Preservation Renewal Contract (HUD–9639)	213	1	213	0.50	106.50	$40.25	$4,286.63
Project-Based Section 8 Housing Assistance Payments Interim (Full) Mark-To-Market Renewal Contract (HUD–9640)	53	1	53	0.50	26.50	$40.25	$1,066.63
Project-Based Section 8 Housing Assistance Payments Interim (Lite) Mark-To-Market Renewal Contract (HUD–9641)	68	1	68	0.50	34.00	$40.25	$1,368.50
Project-Based Section 8 Housing Assistance Payments Full Mark-To-Market Renewal Contract (HUD–9642)	63	1	63	0.50	31.50	$40.25	$1,267.88
Project-Based Section 8	117	1	117	0.50	58.50	$40.25	$2,354.63

Housing Assistance Payments Watch List Renewal Contract (HUD–9643)							
Project-Based Section 8 Housing Assistance Payments Contract For Previous Mod Rehab Projects (HUD–9644)	25	1	25	0.50	12.50	$40.25	$503.13
Housing Assistance Payments Program Housing Finance & Development Agencies Extension Amendment to Old Regulation State Agency Housing Assistance Payments Contract (HUD–9647)	10	1	10	0.50	5.00	$40.25	$201.25
Consent to Assignment of HAP Contract as Security for Freddie Mac Financing (HUD–9648a)	50	1	50	0.50	25.00	$40.25	$1,006.25
Project-Based Section 8 Contract Administration Consent to Assignment of HAP Contract to Freddie Mac as Security for Freddie Mac Credit Enhancement (HUD–9648b)	50	1	50	0.50	25.00	$40.25	$1,006.25
Consent to Assignment of HAP Contract to FNMA as Security for FNMA Credit Enhancement (HUD–9648d)	50	1	50	0.50	25.00	$40.25	$1,006.25
Consent to Assignment of HAP Contract as Security for Financing (HUD–9649)	600	1	600	0.50	300.00	$40.25	$12,075.00
Consent to Assignment of Senior Preservation Rental Assistance Contract (SPRAC) as Security for Financing (HUD–9649a)	50	1	50	.50	25.00	$40.25	$1,006.25
Project-Based Section 8 Contract Administration Consent to Assignment of HAP Contract as Security for Financing When HFA is Both Lender and Contract Administration (HUD–9649b)	100	1	100	0.50	50.00	$40.25	$2,012.50
Consent to Assignment of HAP Contract as Security for FNMA Financing (HUD–9651)	100	1	100	0.50	50.00	$40.25	$2,012.50
Total	21,915		21,915		16,705		$672,356.13

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).

    We do not estimate that there will be any additional cost to respondents or record- keepers beyond those identified 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.

- 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.

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.

Information Collection	Number of Respondents	Frequency of Response	Total Annual Responses	Burden Hours per Response	Total Annual Burden Hrs.	Hourly Cost to Government[2]	Total Annual Cost to Government
Housing Assistance Payments Contract (HUD–52522a and b)	20	1	20	0.50	10.00	$58.35	$583.50
Assignment, Assumption, and Amendment of Section 8 Housing Assistance Payments (HAP) Contract (HUD–5988)	3,555	1	3,555	0.50	1,777.50	$58.35	$103,717.13
Section 8 Use Agreement (HUD–90055)	75	1	75	0.50	37.50	$58.35	$2,188.13
Rent Comparability Grid (HUD–92273–S8)	950	1	950	1.00	950.00	$58.35	$55,432.50
Project-Based Section 8 Housing Assistance Payments: Addendum to Renewal Contract Under Option One or Option Two for Capital Repairs and/or Acquisition Costs (HUD–93181)	50	1	50	0.50	25.00	$58.35	$1,458.75
Project-Based Section 8 Housing Assistance Payments: Addendum to Renewal Contract Under Option One or Option Two for Capital Repairs and/or	150	1	150	0.50	75.00	$58.35	$4,376.25

[2] The estimated annualized cost to the Federal Government is based on the hourly rate of $58.35, of the 2026 General Pay Scale for a GS 13 Step 1, which represents the staff of HUD's Office of Loan Guarantee (OLG).

Acquisition — Post-Rehabilitation Rents at Closing (HUD–93182)							
Rider to Original Section 8 Housing Assistance Payments Contract (HUD–93184)	20	1	20	0.50	10.00	$58.35	$583.50
Amendment to Project-Based Section 8 Housing Assistance Payments Contract [Contract A1] Pursuant to Section 8(bb)(1) of the United States Housing Act of 1937 (HUD–93185a)	25	1	25	0.50	12.50	$58.35	$729.38
Amendment to Project-Based Section 8 Housing Assistance Payments Contract [Contract B] Pursuant to Section 8(bb)(1) of the United States Housing Act of 1937 (HUD–93185b)	25	1	25	0.50	12.50	$58.35	$729.38
Contract Renewal Request Form (HUD-9624)	2,000	1	2,000	1.00	2,000.00	$58.35	$116,700.00
OCAF Rent Adjustment Worksheet (HUD-9625)	7,957	1	7,957	1.00	7,957.00	$58.35	$464,290.95
Letters to Owners/Agents: Option 1 and 3 (HUD–9626)	419	1	419	0.25	104.75	$58.35	$6,112.16
Letters to Owners/Agents: Option 2 and 4 (HUD–9627)	1,801	1	1,801	0.25	450.25	$58.35	$26,272.09
Request to Renew Using Non–Section 8 Units in the Section 8 Project as a Market Rent Ceiling (HUD–9629)	10	1	10	0.50	5.00	$58.35	$291.75
Request to Renew Using FMRs as Market Ceiling (HUD–9630)	88	1	88	0.50	44.00	$58.35	$2,567.40
Sample Use Agreement (HUD–9634)	55	1	55	0.50	27.50	$58.35	$1,604.63
Projects Preparing a Budget-Based Rent Increase (HUD–9635)	1,697	1	1,697	1.00	1,697.00	$58.35	$99,019.95
Project-Based Section 8 Housing Assistance Payments Basic Renewal Contract – One-Year Term (HUD–9636)	500	1	500	0.50	250.00	$58.35	$14,587.50
Project-Based Section 8 Housing Assistance Payments Basic Renewal Contract – Multi-Year Term (HUD–9637)	800	1	800	0.50	400.00	$58.35	$23,340.00
Project-Based Section 8 Housing Assistance Payments Renewal Contract for Mark-Up-To-Market Project (HUD–9638)	169	1	169	0.50	84.50	$58.35	$4,930.58
Project-Based Section 8 Housing Assistance Payments Preservation Renewal Contract (HUD–9639)	213	1	213	0.50	106.50	$58.35	$6,214.28
Project-Based Section 8 Housing Assistance	53	1	53	0.50	26.50	$58.35	$1,546.28

Payments Interim (Full) Mark-To-Market Renewal Contract (HUD–9640)							
Project-Based Section 8 Housing Assistance Payments Interim (Lite) Mark-To-Market Renewal Contract (HUD–9641)	68	1	68	0.50	34.00	$58.35	$1,983.90
Project-Based Section 8 Housing Assistance Payments Full Mark-To-Market Renewal Contract (HUD–9642)	63	1	63	0.50	31.50	$58.35	$1,838.03
Project-Based Section 8 Housing Assistance Payments Watch List Renewal Contract (HUD–9643)	117	1	117	0.50	58.50	$58.35	$3,413.48
Project-Based Section 8 Project-Based Assistance Housing Assistance Payments Contract For Previous Mod Rehab Projects (HUD–9644)	25	1	25	0.50	12.50	$58.35	$729.38
Housing Assistance Payments Program Housing Finance & Development Agencies Extension Amendment to Old Regulation State Agency Housing Assistance Payments Contract (HUD–9647)	10	1	10	0.50	5.00	$58.35	$291.75
Consent to Assignment of HAP Contract as Security for Freddie Mac Financing (HUD–9648a)	50	1	50	0.50	25.00	$58.35	$1,458.75
Project-Based Section 8 Contract Administration Consent to Assignment of HAP Contract to Freddie Mac as Security for Freddie Mac Credit Enhancement (HUD–9648b)	50	1	50	0.50	25.00	$58.35	$1,458.75
Consent to Assignment of HAP Contract to FNMA as Security for FNMA Credit Enhancement (HUD–9648d)	50	1	50	0.50	25.00	$58.35	$1,458.75
Consent to Assignment of HAP Contract as Security for Financing (HUD–9649)	600	1	600	0.50	300.00	$58.35	$17,505.00
Consent to Assignment of Senior Preservation Rental Assistance Contract (SPRAC) as Security for Financing (HUD–9649a)	50	1	50	0.50	25.00	$58.35	$1,458.75
Project-Based Section 8 Contract Administration Consent to Assignment of HAP Contract as Security for Financing When HFA is Both Lender and Contract Administration (HUD–9649b)	100	1	100	0.50	50.00	$58.35	$2,917.50
Consent to Assignment of HAP Contract as Security for FNMA Financing (HUD–9651)	100	1	100	0.50	50.00	$58.35	$2,917.50

Total	21,915		21,915		16,705		$974,707.58

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. It includes 9 revised forms and 2 new forms, and all other Forms in the Collection (Unchanged). The number of estimated respondents and the burden hours changed due to the addition of two new forms:

    a. Project-Based Section 8 Contract Administration Consent to Assignment of HAP Contract to Freddie Mac as Security for Freddie Mac Credit Enhancement (HUD–9648b). The addition of this form increased the public burden by an estimated 25 hours and $1,006.25 annually. It increased the estimated cost to the federal government by $1,458.75.

    b. Project-Based Section 8 Contract Administration Consent to Assignment of HAP Contract as Security for Financing when HFA is Both Lender and Contract Administrator (HUD–9649b). The addition of this form increased the public burden by an estimated 50 hours and $2,012.50 annually. It increased the estimated cost to the federal government by $2,917.50.

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.

    There will be no publication of information collections.

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 is not seeking approval to avoid displaying the expiration date.

18. Explain each exception to the certification statement.

    There are no exceptions to the certification statement.