

**Supporting Statement for Paperwork Reduction Act Submissions
Energy and Performance Information Center (EPIC)
(OMB 2577-0274)**

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.**

Under Section 9 of the U.S. Housing Act of 1937 (1937 Act) and the regulations at 24 CFR part 905, the Public Housing Capital Fund Program (Capital Fund Program or CFP) provides financial assistance to public housing agencies (PHAs) to make improvements to existing public housing sites and buildings. Eligible uses of capital funds include the development, financing, and modernization of public housing projects.

The Energy and Performance Information Center (EPIC) system provides a streamlined way for PHAs to fulfill their Capital Fund reporting requirements under 24 CFR 905.300. By regulation, PHAs are required to submit: 1) a CFP Five-Year Action Plan (Formerly HUD-50075.2) describing the capital improvements necessary to ensure long-term physical and social viability of the PHA's public housing developments, 2) a Capital Fund Annual Statement/Budget for each year (Formerly HUD-50075.1), and 3) a Performance & Evaluation (P&E Report) (Formerly HUD-50075.1), as requested. EPIC allows PHAs to submit copies of certifications of compliance and/or documentation to comply with the award, monitoring, and/or closeout of a Capital Fund Grants in the Document Management Center. For example, a Capital Fund Annual Submission as defined in the annual Processing Guidance. Moreover, PHAs may request additional capital resources, such as Operating Funds, for Capital Fund purposes in EPIC.

- 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 previous collection. As noted above, the information submitted in CFP Five-Year Action Plans is used by HUD to fulfill its oversight responsibilities. Field office staff review and approve Five-Year Action Plans to verify that all work activities are eligible items under the Capital Fund and to assess the level and type of environmental review required. Upon budget submission, HUD performs validation checks to full requirements to monitor statutory and regulatory restrictions, including limits on the percentage of funding that may be used for Administration, transferred to Operations, or used to undertake Management Improvements. HUD also uses the budget information to ensure that PHAs participating in the CFFP to leverage their limited Capital Funds are properly allocating funds for the debt service payments, and to accurately reflect Capital Funds used as part of RAD transactions. For EPIC budget submissions found in compliance, HUD updates the LOCCS in accordance with the funds spread in EPIC; this enables PHAs to draw down funds without requesting manual updates or revisions from HUD field offices.

HUD analyzes PHA allocations of Capital Funds to report to Congress and interested stakeholders on spending patterns and to develop budgetary justifications. The transition from paper to electronic submissions in fiscal year (FY) 2018 exposed data quality and reporting compliance issues that had previously been more difficult to diagnose. Therefore, as the quality of the data improves, the Department will gain a better understanding of the problem—both its nature and its scope—through the data collected in EPIC. The electronic collection of data formerly collected through paper Forms HUD-50075.1 and HUD-50075.2 enables the Department to follow the money from grant to capital improvement and to evaluate the successes of the program. This, in turn, allows the Department to use the data to get a real-time picture of the use of funding and the progress made toward meeting the considerable capital needs of the public housing inventory.

Moreover, the improved data collection around energy efficiency improvements will enable the Department to identify areas for increased savings in consumption. The EPC program enables grantees to leverage these savings into additional funding for meeting capital needs. The Department will be able to monitor the EPC process and document the energy savings realized through capital improvements implemented using EPIC financing. These data points, in conjunction with the PNA data and the energy audit data, will increase transparency in public housing and create a platform for evaluating performance and identifying efficiencies.

Data collected on public housing development will be used to ensure greater accuracy of present data and will be used to identify ways PHA grantees are using both Federal and non-Federal funding sources to meet the affordable housing needs of the American public.

This information collection in EPIC also enables HUD to fulfill its oversight responsibilities. HUD reviews and approves CFP Five-Year Action Plans to verify that all work activities are eligible items under the Capital Fund and to assess the level and type of environmental review required by Federal regulations. Upon the PHA's Annual Statement/Budget submission, HUD performs validation checks to fulfill requirements to monitor statutory and regulatory restrictions on the funds, including limits on the percentage of funding that may be used for Administration, transferred to Operations, or used to undertake Management Improvements. HUD also utilizes budget information to ensure that PHAs participating in the Public Housing Capital Fund Program effectively manage their limited capital funds. This includes appropriately allocating resources for debt service payments and accurately reflecting the use of Capital Funds within the Rental Assistance Demonstration (RAD) program. For EPIC budget submissions found in compliance, HUD updates the Budget Line Items (BLI) obligations in the Line of Credit Control System (LOCCS) in accordance with the funds spread in EPIC; this enables PHAs to draw down funds without requesting manual updates or revisions from HUD field offices. The P&E Report allows HUD to monitor other measures such as lead-based paint hazard mitigation measures, installation information, and actual costs/expenditures. HUD analyzes PHA obligations of Capital Funds to report to Congress and interested stakeholders on spending patterns and to develop budgetary justifications.

In addition to collecting and using information in CFP Five-Year Action Plans and Budgets, several EPIC modules currently in use or in development collect additional key programmatic information or streamline PHA reporting.

Energy Efficiency Measures (EEMs): The Core Activity/Energy module of EPIC collects information on EEMs implemented with Capital Funds. HUD previously reported aggregated data toward its strategic goal on energy efficiency. Users can now enter utility conservation measures within the Five-Year Action Plan Work Activity Module for more efficient data entry.

Physical Needs Assessments (PNAs): This functionality enables PHAs to download Inventory Management System/Public and Indian Housing Information Center (IMS/PIC) data from EPIC to complete physical needs assessments. In the future, PHAs who wish to voluntarily submit their PNA data into EPIC may achieve time savings by drawing from items identified in the PNA to drop into their Five-Year Action Plan. Currently, PHA submission of PNA data to EPIC is voluntary.

Energy Performance Contracts: Under 24 CFR 990.185, PHAs may qualify for conservation incentives when undertaking Energy Conservation Measures that are financed by an entity other than HUD through the use of an Energy Performance Contract (EPC). This allows PHAs the ability to privately finance energy improvements so that PHAs can use Capital Funds for other improvements. EPCs result in lower operating costs for PHAs through reduced utility cost. The EPIC data system collects and maintains detailed information on the EPC's process, including data related to implemented energy efficiency improvements. The electronic submission process streamlines the former paper submission process and reduces the time for approval.

Public Housing Development: EPIC tracks the development of public housing with Federal funds and through other means, including mixed-finance development, enabling more efficient review, and submission of required development documents, as required under 24 CFR 905.324.

Emergency and Disaster Grant (EDG): The Emergency and Disaster module of EPIC allows PHAs to submit their grant applications. The EPIC data system collects information about the EDG process, including energy efficiency improvements. The electronic submission process streamlines the former paper submission process and reduces the time for approval.

Additional Capital Resources: This function allows PHAs to request use of additional capital resources, such as a portion of Operating Funds, for Capital Fund eligible activities.

Mixed Finance Development: This module allows a PHA to alert the Department of its intention to propose a mixed-finance transaction as well as various deadlines associated with the non-Federal sources of financing so that the Department can provide technical assistance to the PHA in the planning process.

Grant Closeout: This functionality enables PHAs to close out their grants from EPIC to complete physical needs assessments. The electronic submission process streamlines the former paper submission process and reduces the time for approval.

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.**

Information collected in EPIC is 100 percent electronic. Prior to the implementation of EPIC, PHAs used a paper process to submit Five-Year Action Plans and Annual Statement/Budgets/P&Es. (This information was previously collected in hard copy on Forms HUD-50075.1 and HUD-50075.2 under collection OMB control number 2577-0157.) The EPIC system automates many aspects of this process.

The transition from a paper submission to an electronic submission of the Five-Year Action Plan and Annual Statement/Budget forms in EPIC began in FY17 based on the grantee fiscal year end. For FY17, PHAs with 3/31 fiscal year ends and 6/30 fiscal year ends were required to transition to electronic submissions in EPIC. Beginning in FY18, all PHAs were required to transition to electronic submission of the Five-Year Action Plan and Annual Statement/Budget in EPIC. PHAs must also submit P&E Reports in EPIC.

Electronic submission in EPIC automates many steps in the planning and approval process. When completing these submissions in EPIC, many items pre-populated based on existing HUD system data. PHAs with an approved Five-Year Action Plan in EPIC can easily create their plan for the next reporting period by “copying forward” their current plan and making updates. Once HUD approves a work item in the Five-Year Action Plan, it automatically retains its approved status, even if the PHA moves the item into a new plan or year. Of particular significance, the system automates the budget revision process. Whereas HUD staff previously reviewed and approved budgets and then manually moved funds in LOCCS, HUD automated the process of reviewing budgets and changing LOCCS accordingly.

The Document Management Center automates and centralizes a previously paper-based process that required PHAs to submit documents for award management and close-out including digital Actual Modernization Cost Certificate (AMCC)/Actual Development Cost Certificate (ADCC).

HUD’s electronic collection of EEM information is also pre-populated with data to the greatest extent possible to minimize data entry. Once the initial report is created for a grant award, recipients also copy the file forward for editing in the next year.

The EPC and Public Housing Development modules automate and streamline existing paper-based processes. For example, PHAs wishing to engage in an EPC are able to submit many of the required documents electronically. Much of the process is automated through EPIC as well. Information on the public housing development is collected piecemeal at the field office level in hard copy; EPIC automates and centralizes this data collection.

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 is not collected elsewhere.

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

This information does not impact small businesses. Many of the recipients of HUD funds subject to this data collection are small PHAs, but the impact is expected to be minimal.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The regulations at 24 CFR 905.300 specify the frequency and timeline of submission of CFP Five-Year Action Plans, Annual Statements/Budgets, P&E Reports, and the submission of documentation to HUD to receive funding.

If HUD's review of CFP Five-Year Action Plans were reduced or eliminated, PHAs would be at risk of having funds recaptured or be sanctioned in another manner as deemed appropriate by HUD due to spending on ineligible purposes and failure to comply with environmental review requirements, per 24 CFR 905.804. If HUD eliminated compliance checks of budgets for compliance with statutory and regulatory spending limitations, PHAs and HUD would also face risk of audit findings and PHAs would see funds recaptured.

If HUD were unable to receive required documentation to receive funding in the Document Management Center, HUD could not maintain proper financial controls and could not, for example, contract the funds in LOCCS.

Misuse or inefficient use of Federal funds would also deny these funds to their intended purpose and erode the public's trust.

Without the information from Five-Year Plans, budgets, and reporting on EEMs, HUD would be limited in its ability to assess the use of Capital Funds, the needs of the inventory, and performance or progress toward reduced energy costs made by PHAs. However, the Department reduced the frequency of EEM reporting from quarterly to annually in the previous revision to this information collection to provide relief to PHAs.

Finally, much of the information collected in EPIC will enable grantees to realize benefits to privately finance energy improvements for PHAs to use Capital Funds for other improvements. The EPCs result in lowering operating costs for PHAs through reduced utility cost. For example, the EPC process, the request for additional capital resources, and the development process require Department approvals under the United States Housing Act of 1937.

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;**
PHAs may submit budget revisions as needed when their spending plans change, which may be in response to changing priorities or an emergency. Submitting a budget revision in EPIC enables HUD to update the spread of funds in LOCCS so they can be drawn down by the PHA.
- **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 the publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

HUD published a Notice of Proposed Information Collection for Public Comments in the Federal Register, Volume 91; No. 94; Page 27971 on May 15, 2026. The public was given until July 14, 2026, to submit comments on the proposed information collection. HUD received no comments on this proposed collection.

- **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.**
- **Consultations 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.**
There are no special circumstances that would cause these information collections to be conducted inappropriately.

There were no efforts with persons outside the agency to obtain 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.

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

No payments or gifts to respondents are provided.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

There is no assurance of confidentiality provided. Only summary level data will be made available to the public. EPIC does not collect any personally identifiable information and does not involve the collection of any information covered by the Privacy Act. Information at the grantee level is not sensitive.

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 information collected does not contain 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;

- 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 Core Activity data collection will cover 2,800 grantees with 11,800 active grants that will be reported in EPIC. Average time to complete the survey is 30 minutes. Respondents will be required to submit information under the core activity module annually. Each respondent will spend an additional 1.5 hours collecting the data required to complete the survey. The annual reporting burden hours are based on the requirement that each recipient submits a separate report for each active grant.

The same universe of grantees will electronically submit Forms HUD-50075.1 (the Annual Statement/Budget and P&E Report) and HUD-50075.2 (the Capital Fund Program Five-Year Action Plan). The AMCC/ADCC forms have been automated in the Document Management Center that was previously paper-based process to reduce the hours of the collection. The Department anticipates each “form,” separated by function in EPIC, will require 1 hour to complete, as broken out in the table below. Data suggest approximately 6,500 open grants at any given point in time for which the Annual Statement/Budget would be required annually. PHAs are only required to update the Five-Year Action Plan every 5 years, but many PHAs do so more frequently (PHAs may elect whether to submit a fixed plan in five-year intervals or a rolling plan annually and may change their election as desired). The Department anticipates up to 2,000 responses per year through this module. Also, users can now enter utility conservation measures within the Five-Year Action Plan work activity module for more efficient data entry. The P&E Report is no longer required annually but remains an effective monitoring tool for the Department.

The same universe of grantees will electronically submit copies of documents required by regulation to allow the Department to contract new awards in LOCCS. This collection of documents is required for each new award, which the Department estimates approximately 2 per year and take approximately 30 minutes to complete.

The Department anticipates approximately 15 requests from PHAs to use additional capital resources, such as a portion of Operating Funds, for Capital Fund eligible activities. Such a request should take approximately 30 minutes to complete.

The Department anticipates 30 submittals for EPC financings per year. The hourly burden associated with this process is much higher but participation in the process is voluntary and at the PHA’s discretion.

The Department anticipates up to 60 new developments per year. These developments may contain varying numbers of units and correspondingly different levels of funding, both Federal and non-Federal. This process also demands a greater burden, but development is at the PHA's discretion.

The Department anticipates approximately 60 PHAs per year will submit plans through the Mixed Finance Early Warning module. This module will allow a PHA to alert the Department of its intention to propose a mixed-finance transaction as well as various deadlines associated with the non-Federal sources of financing so that the Department can provide technical assistance to the PHA in the planning process.

The Department anticipates approximately 50 PHAs per year will submit applications through the CFP Grant Application module. This module allows a PHA to alert the Department of its intention to address emergency and disaster activities so the Department can provide technical assistance in the planning process.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hours Per Response	Annual Burden Hours	Hourly Cost Per Response*	Annual Cost
Core Activity	2,800	1	2,800	1	2,800	\$57.47	\$160,916.00
5-Yr Plan (including Utility Conservation Measures)	2000	1	2,000	2	4,000	\$57.47	\$114,940.00
Annual Stmt/Budget	2,800	3	8,400	1	8,400	\$57.47	\$482,748.00
P&E	2,800	0.5	1,400	1	1,400	\$57.47	\$80,458.00
Document Management Center (including new digital closeout form)	2,800	2	5,600	0.5	1,400	\$57.47	\$160,916.00
Additional Capital Resources	15	1	15	0.5	7.5	\$57.47	\$431.03
EPC	30	1	30	120	3600	57.47	\$206,892.00
Public Housing Development	60	1	60	120	7,200	\$57.47	\$413,784.00
Mixed Finance Development	60	1	60	0.33	20	\$57.47	\$1,137.91
CFP Grant Application Module	50	1	50	2	100	\$57.47	\$5,747.00
Totals	13,415	12.5	20,415	248.33	30,327	57.47	\$1,742,909.93

*Source: [Occupational Employment and Wage Statistics \(OEWS\) Tables, U.S. Bureau of Labor Statistics](#)

13. **Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet shown in Items 12 and 14).**

There are no additional costs to respondents.

14. **Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expenses 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	Responses Per Annum	Burden Hours Per Response	Annual Burden Hours	Hourly Cost Per Response*	Annual Cost
Core Activity	2,800	1	2,800	1	2,800	\$58.35	\$163,380.00
5-Yr Plan (including Utility Conservation Measures)	2,000	1	2,000	2	4,000	\$58.35	\$233,400.00
Annual Stmt/Budget	2,800	3	8,400	1	8,400	\$58.35	\$490,140.00
P&E	2,800	0.5	1,400	1	1,400	\$58.35	\$81,690.00
Document Management Center (including new digital closeout form)	2,800	2	5,600	0.5	2,800	\$58.35	\$163,380.00
Additional Capital Resources	15	1	15	0.5	7.5	\$58.35	\$437.63
EPC	30	1	30	120	3,600	\$58.35	\$210,060.00
Public Housing Development	60	1	60	120	7,200	\$58.35	\$420,120.00
Mixed Finance Development	60	1	60	0.33	20	\$58.35	\$1,155.33
CFP Grant Application Module	50	1	50	2	100	\$58.35	\$5,835.00
Totals	13,415	12.5	20,415	248.33	30,327	58.35	\$1,769,597.96

The assumed hourly cost figure of \$58.35 is equivalent to the hourly salary of a project management specialist (i.e., a GS-13 employee). The total estimated hours for the collection is 30,327 hours. The costs for this data collection are project management and monitoring of grantees. The annualized cost is funded by the Federal Government.

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

Revisions:

1. There was a new module implemented for EDG in EPIC that now collects applications that were previously submitted on paper to reduce the labor and less errors for submission.
2. The new digital closeout forms include AMCC/ADCC that have been automated in the Document Management Center, which was previously a paper-based process, to reduce the hours of the collection by 20.
3. Users can now enter utility conservation measures within the Five-Year Action Plan Work Activity Module for more efficient data entry that reduced the burden of the collections by approximately 60 hours.

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 data will be tabulated, summarized, and published in various internal and external reports (including annual performance reports) and press releases. The data may also be used by researchers to produce scholarly articles.

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 OMB expiration date.

18. Explain each exception to the certification statement.

There is no exception to the certification statement.