

Supporting Statement for Paperwork Reduction Act Submissions
Moving to Work Amendment to Consolidated Annual Contributions Contract
OMB #2577-0294

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 Moving to Work (MTW) Amendment to the Annual Contributions Contract(s) (MTW ACC Amendment) (formerly called the Moving to Work Amendment to the Consolidated Annual Contributions Contract), signed by HUD and the selected public housing agency (PHA), is necessary to authorize new PHA's participation in the MTW demonstration pursuant to the 2016 Appropriations Act, and the 21st Century ROAD to Housing Act. It will allow the PHA to operate under the MTW Operations Notice and its respective selection notice, while retaining the authority of the ACC when not otherwise waived by the MTW Operations Notice, and to detail the termination and default actions of HUD should an agency fail in its implementation of the demonstration. The signing of this amendment would also allow an existing MTW agency with a standard agreement to operate under the Operations Notice instead at their choosing.

- 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 with change for a document to be used by HUD and the PHA to authorize and govern new PHA's participation in the MTW demonstration pursuant to the 2016 Appropriations Act. The MTW ACC amendment takes an average of 1 hour per response. HUD collects this information to authorize a PHA's participation in the MTW demonstration pursuant to the 2016 Appropriations Act. It is required to participate in the MTW demonstration. HUD uses the information to authorize and govern a PHA's participation in the demonstration. The information collected will not be held confidential.

- 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.**

This is 100% electronic but HUD cannot accept digital signatures for the MTW ACC Amendment due to the legal authorizing nature of the document. HUD can accept scanned documents that have been signed physically (i.e., a wet signature). So, HUD can accept electronic submissions of the scanned MTW ACC Amendment with the PHA's chief executive's written signature, to Pravin.m.krishnan@HUD.gov.

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. The document is a legally binding amendment to the ACC and is necessary for an agency to participate in the MTW demonstration.

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

This collection will include PHAs with under 1,000 aggregate public housing and voucher units. The burden cost for this collection is 1 hour per PHA, which represents the one-time execution of the MTW ACC Amendment. There is no ongoing, annual burden cost associated with this collection.

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 amendment to the ACC is not signed, then a PHA cannot participate in the MTW demonstration.

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. Recipients are required to submit Federal Financial Reports (SF-425s) quarterly and within 90 days of project completion.
- **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 the study;**
Not applicable.
- **requiring the use of 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 secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**
Not applicable.

8. **If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

In accordance with 5 CFR 1320.8(d), the agency's notice announcing this collection of information appeared in the *Federal Register* on Volume 91; No. 94; page 27970, on May 15, 2026. The public was given until July 14, 2026, to submit comments on the proposed information collection. HUD received two comment on this proposed collection.

- Request: Respondent requested a copy of the proposed forms.
- HUD Response: Provided amended HUD form to the respondent via email on 10/29/2026.
- **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.

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

There are no payments or gifts to respondents with respect to this collection.

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 PII collected in this survey. HUD is committed to protecting the privacy of individuals' information stored electronically or in paper form, in accordance with Federal privacy laws, guidance, and best practices.

- 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.**

There are no questions of a sensitive nature with respect to this collection. This collection does not ask sensitive/private questions (sex, religion, etc). Data is limited to program participation.

- 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 total annual burden of this collection is expected to be 30 hours. The total estimated annual cost for this information collection is \$2,680.50. To estimate the hourly cost per respondent, HUD used the Department of Labor Bureau of Labor Statistics' most recent (May 2025) data on the State and local government workers by occupational and industry group, [Occupational Employment and Wage Statistics](#). We estimate these members Lawyers, professional series, throughout the U.S, to have an average hourly rate of \$89.35.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Cost
HUD-50166 MTW ACC Amendment	30	1	30	1	30	\$89.35	\$2,680.50

The MTW ACC Amendment simply requires the signature of a selected PHA. There is a 1-time, 1-hour burden for each agency designated pursuant to the FY 2016 Appropriations Act, and the 21st Century ROAD to Housing Act; no additional annual response is required. There is only 1 remaining slot out of 100 authorized by the 2016 Appropriations, but 2 MTW agencies who joined

the program prior to 2016 elected last year to transition from their MTW agreements to the Operations Notice, as authorized by this MTW ACC amendment, and more may follow. Additionally, the 21st Century ROAD to Housing Act allows HUD to add up to an additional 25 agencies at the Secretary's discretion. So, an estimate was made assuming several more existing MTW agencies may wish to transition using this amendment as well, and then 30 was added for the new law.

- 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).**

Not applicable.

- 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 Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
HUD-50166 MTW ACC Amendment	30	1	30	1	30	\$68.96	\$2,068.80

The annual cost is based on an estimate of 30 new ACC amendments at 1 hour each, which comes to \$2,068.80 for staff time (this averages the hourly wage for a GS14, from OPM.gov, which encompasses the GS levels of the MTW team). Operational expenses will be nominal as the document is 2 pages and no support staff is needed.

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

This is a revision with change from the last submission.

- 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 amendment to the ACC will be published on HUD's website as a matter of public record and requires no analysis.

- 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 amendment to the ACC will display the expiration date

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

There is no exception to the certification.