
19. Certification for Paperwork Reduction Act Submissions

On behalf of the U.S. Department of Housing and Urban Development, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9.

Note: The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320.8(b)(3) appear at the end of the instructions. The certification is to be made with reference to those regulatory provisions as set forth in the instructions.

The following is a summary of the topics, regarding the proposed collections of information that the certification covers:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities;
- (d) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) It indicates the retention periods for recordkeeping requirements;
- (g) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
 - (i) Why the information is being collected;
 - (ii) Use of the information;
 - (iii) Burden estimate;
 - (iv) Nature of response (voluntary, required for a benefit, or mandatory);
 - (v) Nature and extent of confidentiality; and
 - (vi) Need to display currently valid OMB control number;
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to collected (see note in item 19 of the instructions);
- (i) It uses effective and efficient statistical survey methodology; and
- (j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in item 18 of the Supporting Statement.

N/A

Signature of Program Official: X Donald J La Voy, Deputy Assistant Secretary Office of Public and Indian Housing, Real Estate Assessment Center	Date:
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Signature of Senior Officer or Designee: X Colette Pollard, Departmental Reports Management Officer, Office of the Chief Information Officer	Date:
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Supporting Statement for Paperwork Reduction Act Submissions

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.

Public Housing Agencies (PHAs) administering federal assisted housing programs (i.e., public housing, Section 8 Housing Choice Voucher and Moderate Rehabilitation programs) using federal funds are required to solicit demographic, family profile, income and housing information on the entire nationwide population of tenants residing in assisted housing. With this information the programs can be monitored and evaluated as required under the following:

- The United States Housing Act of 1937 (42 U.S.C 1437 et seq.)
- Housing and Community Development Act of 1987 (42 U.S.C. 3543(a) – authorizes PHAs to collect social security data)
- Title VI of the Civil Rights Act of 1964 (42 U. S. C. 2000d)
- The Fair Housing Act (42 U. S. C. 3601-19)
- Quality Housing and Work Responsibility Act of 1998 (Public Law 105-276 Title V)
- HUD Appropriations Act of 1996 (Public Law 104-134 Section 204)
- “Electronic Transmission of Required Family Data for Public Housing, Indian Housing, and the Section 8 Rental Certificate, Rental Voucher, and Moderate Rehabilitation Programs” (24 CFR Part 908)
- 24 CFR Part 5 (5.210 through 5.240)

Pursuant to 24 CFR 5.233 (Exhibit A), these PHAs are required to use HUD’s Enterprise Income Verification (EIV) system to verify employment and income information of program participants and to reduce administrative and subsidy payment errors. PHAs also use the EIV Debts Owed module, which identifies families who no longer participate in assisted housing programs due to adverse termination of tenancy and/or assistance, and owe a debt to a PHA, in determining eligibility for assistance and continued program participation pursuant to 24 CFR 960.203 and 982.552 (Exhibits B and C).

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.

The EIV Debts Owed module is a national repository of families that owe a debt to a PHA and/or have been terminated from a federally assisted housing program. Only PHA authorized EIV users access the information in the module when determining a family’s suitability for rental assistance. PHAs, in accordance with their policies, may deny Federal housing assistance to families who either: 1) owe a debt to a PHA; or 2) have previously been unable to comply with HUD program requirements.

At the end of a family’s participation in a Federal housing assistance program (EOP), PHAs enter the following information in the Debts Owed module, as applicable:

1. Amount of debt owed by the former tenant to a PHA;

2. Indication of executed repayment agreement;
3. Indication of bankruptcy filing;
4. The reason for an adverse termination of the family from a Federally assisted housing program.

The Debts Owed module is the only means by which PHAs can report this information.

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 information is collected electronically from PHAs via HUD's EIV system. The PHA logs into the EIV system and accesses the Debts Owed to PHAs & Termination module and identifies the family and enters any amount owed, checks a checkbox if the PHA has entered into a repayment agreement for the outstanding debt, checks a checkbox if the PHA has been notified of a bankruptcy filing, and if applicable, selects a reason, from a pre-populated list, for adverse termination from Federally assisted housing. Once the PHA has entered or selected the applicable information, the PHA clicks on the submit button and then confirms submission by clicking on the OK button.

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 similar information collected or available under previous collections of information. As such, there is no duplication.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The information being collected has no significant impact on small business.

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.

If this information is not collected, the Department is at risk of paying limited Federal dollars on behalf of families who should not be eligible to receive such assistance. Furthermore, if this information is not collected, the public will perceive that there are no consequences for a family's failure to comply with HUD program requirements.

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 often than quarterly;**

None – at a minimum, the respondent would have to report information within 15 months of the date the family moved out of Federally assisted housing.

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

None

*** Requiring respondents to submit more than an original and two copies of any document;**

None

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

None

*** In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**

None

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

None

***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**

A pledge of confidentiality is supported by the statutory authority established at 42 USC 1437d(q)(5) .

*** 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.**

None

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.

HUD published a Notice of Proposed Information Collection for Public Comments in the Federal Register, Volume, 81, No, 80 Page 24634 on April 26, 2016. The public was given until June 27, 2016, to submit comments on the proposed information collection. HUD received no comments on this proposed collection.

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

No payment or gifts are provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Section 3544 of the Housing and Community Development Act of 1987 requires the confidential treatment of personally identifiable information (PII), subject to civil and criminal penalties, as do HUD regulations at 24 CFR part 5. The form HUD 50058, Family Report (OMB approval number 2577-0083, expiring 11/30/2016), on which families provide the confidential information that respondents may use when entering data in the EIV Debts Owed module, includes a Privacy Act statement advising the family that the information on the form (PII) is confidential and protected by the Privacy Act of 1974 (5 USC 552a) (Exhibits D and E). The Privacy Act statement also informs the family that the collection is mandatory and the information requested is required to obtain and retain benefits pursuant to 24 CFR part 5 subpart B.

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 PII may be used by the PHA respondent to identify the former program participant when the PHA is recording a debt owed by that person to that PHA or the applicable termination information. The debt owed and termination information in this module is then used by other PHAs when determining program eligibility.

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.**

Families end participation in HUD rental assistance programs each month. Part of the PHA's occupancy processes is to enter monthly, as applicable, debts owed and termination information in the EIV Debts Owed Module.

Based on the program requirements, the total number of annual responses is:

Number of Respondents (approximate number of PHAs)	X	Frequency of Responses (Monthly)	=	Annual Number of Responses
3937		12		47,244

The number of families a PHA reports yearly depends on the PHA's size (i.e., the number of families assisted). The national average of families that end participation (EOP) each year in a PIH program is 10% of the number of families the PHA assists.

The annual burden hours are estimated by multiplying: (1) the number of families in the Public and Indian Housing Information Center (PIC) system end of participation report that ended participation in all PIH programs from February 1, 2015 through January 31, 2016, which was 314,257 **by** (2) the time it takes for the PHA to retrieve information from the tenant file, access the EIV system, and enter the debts owed termination information to EIV, which is estimated to be 5 minutes per family (0.0833 hours).

$$314,257 \times 0.0833 \text{ hours (5 minutes per family)} = 26,177.61$$

The estimated annual cost to respondents is determined by multiplying: (1) the annual hour burden hours (26,177) **by** (2) the Department of Labor’s Bureau of Labor 2014 median rate of pay for community and social service occupations (which is \$21.03).

$$26,177.61 \times \$21.03 = \$550,515.14$$

Estimate of the Hour Burden of the Collection of Information	
Number of respondents	3937
Frequency of Responses	Monthly
Total Annual Burden Hours	26,177.61
Total Estimated Annual Cost to Respondents	\$550,515.14

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

Notwithstanding HUD’s request to collect this information, PHAs already collect and maintain this information. As such, there is no annual cost burden to respondents or record keepers resulting from this collection of information.

14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

There is no additional cost to HUD for the collection of this information.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

The reasons for the adjustments in Item 13 on OMB Form 83-I are twofold. One, in PIC there are fewer PHAs than there were at the time of the previous request for an extension of this PRA. This reduces the number of respondents and total annual responses. Two, during the time period used to estimate the burden hours for this extension, the number of families in PIC that had an end of participation (EOP) in PIH programs had increased to 314,257 for the time period of February 1, 2015 through January 31, 2016, from the previous burden hour estimate of 279,334 for the extension request

of (February 1, 2012 through January 31, 2013). Therefore, this increase in family EOP's increases the annual burden hour estimate since PHAs are required to use the EIV Debts Owed module when a family's participation in a HUD subsidized program is ended. At that time, PHAs input information into Debts Owed to identify families who no longer participate in assisted housing programs due to adverse termination of tenancy and/or assistance, and owe a debt to a PHA. The EIV Debts Owed module is a national repository of families that owe a debt to a PHA and/or have been terminated from a federally assisted housing program. When determining a family's suitability for rental assistance, PHAs, in accordance with their policies, may deny Federal housing assistance to families who either: 1) owe a debt to a PHA; or 2) have previously been unable to comply with HUD program requirements.

16. For collections 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 collected by PHAs is not published or made available to the public.

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.

Not applicable. HUD displays the OMB control number and expiration date with EIV's Debts Owed to PHAs and Terminations module; as well as on electronic and paper documents that pertain to this information collection effort.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methods.