



January 9, 2015

HUD Desk Officer - Office of Management and Budget
New Executive Office Building
Washington, DC 20503

Re: Comments on Housing Choice Voucher Program, OMB Approval Number 2577-0169

Dear HUD Desk Officer:

Atlanta Housing Authority believes HUD-52665 (OMB approval date of 09/2014 and expiration date of 09/30/2017) does not require further revision and should remain in circulation for use in the Housing Choice tenant-based program. As a standardized form, it effectively serves public housing authorities (PHAs) in the processing of portability transactions without adding to administrative burden. The HUD-52665 is effective in managing the regulatory requirements associated with the coordination of portability transactions between the Initial PHA (IPHA) and Receiving PHA (RPHA). It does so by providing:

- Detailed contact information for the IPHA and RPHA (*contact names, address and phone numbers*).
- Important dates for the *voucher issuance, expiration and due date of the initial billing*.
- Action types that are NOT reflected on the HUD-50058; *Abatements, Returns to IPHA, Absorptions, Payment Standard Change and Other* are reflected on the HUD-52665.
- Administrative fees to inform the IPHA for payment purposes.
- Accountability: Someone at the RPHA must sign off on the HUD-52665 confirming the legitimacy of the requested HAP payments.

Additional Responses: Solicitation of Public Comment:

- (1) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;**

AHA Response:

The HUD-52665 allows a PHA to establish sufficient documentation to validate that a HAP Contract was initiated and is continuously managed according to HUD rules and regulations. For purposes of portability, the HUD-52665 is a necessary document for monitoring all activities between PHAs and serves as a mechanism to assist in the prevention and detection of financial mismanagement.

(2) The accuracy of the agency's estimate of the burden of the proposed collection of information;

AHA Response:

PHAs may find it difficult to manage portability HAP processing practices and responsibilities on a consistent basis resulting in the introduction of increased volumes of administrative oversight. The HUD-52665 provides an accountability system of checks and balances in conjunction with the HUD-50058. The HUD-52665 provides certification and notice to the IPHA of ALL changes that occur to a HAP Contract.

(3) Ways to enhance the quality, utility, and clarity of the information to be collected;

AHA Response:

Retaining the current HUD-52665 accomplishes these enhancements.

(4) Ways to minimize the burden of the collection of information on those who are to respond; including through the use of appropriate automated collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

AHA Response:

AHA is in agreement that electronic submission of all financial forms would minimize administrative burden.

Sincerely,

A handwritten signature in blue ink, appearing to read "R Bentley".

Renee Bentley
Senior Vice President, Customer Services