

Departmental Clearance & Approval Record

U.S. Department of Housing
and Urban Development
Office of Administration

Note to Clearing Offices: If your response has not been received by the Deadline Date, the Originating Office may proceed without it.

1. Job Control Number(s) 2502-0275	2. Classification Number	3. Type of Action ☒ Clearance ☐ Final Clearance ☐ Reclearance ☐ Approval	4. Deadline Date December 20, 2018
5. Complete Title Application for the Transfer of Physical Assets			
6. Principal Audience or User ☒ HUD Staff ☒ Program Participants		6a. Proposed Distribution (spell-out, do not use codes)	
7. Person most familiar with the Document Harry Messner		7a. Organization Code / Office HTNF	7b. Telephone Number 202-402-2626
		7c. Room 6170	
8. Type of Document ☐ New Handbook ☐ Handbook Revision ☐ New Form ☐ Federal Register Notice ☐ Regulation ☒ Other (specify) OMB Collection ☐ Handbook Change ☐ Notice ☐ Form Revision ☐ Publication ☐ Special Directive			
9. Mark the organization(s) reviewing this document (specify under "other" the HQ/Field staff components within the reviewing offices, e.g., admin officers) ☒ ADM ☐ GNMA ☒ OCHCO ☐ Chief Proc. Ofcr. ☐ S/Departmental EEO ☐ CIR ☐ Public Affairs ☐ Enf. Ctr. ☒ CPD ☒ H ☒ OGC ☐ CFO ☐ CFO ☐ S/Labor Relations ☐ S/SDBU ☐ Other ☒ CIO ☒ FHEO ☒ PD&R ☒ OIG ☐ S/Lead Hazard Control ☐ REAC ☐ PECO ☐ PIH ☐ ADSFM			
10. Front-End Risk Analysis ☐ Completed ☐ In Process ☒ Not Needed	11. Information Collection Requirements (Paperwork Reduction Act) ☐ Completed ☒ In Process ☐ Not Needed	12. Impact on Small Entities (Regulatory Flexibility Act) ☐ Completed ☐ In Process ☒ Not Needed	13. Finding of No Significant Impact (FONSI) / Environmental Impact Statement (EIS) (National Environmental Policy Act) ☐ EIS Required ☐ FONSI Required ☒ FONSI Not Required
14. Organization	Signature & Title of Clearing/Approving Official	Date	Concur (no comments) Concur (comments attached) Non-Concur (comments attached)
CIO-4186	Colette Pollard, Departmental PRA Officer		
CIO, IT 4166	Deatrie Perry		
CPD-Room 7143	Sean Joyner		
FHEO-Room 5240	Celia Carpentier		
ADMIN-10139	John Bravacos, Privacy Branch Office 	4/19/2019	X 
PD&R-Room 8202	David Hardiman		
OGC	OGC		
OIG	Janice Jackson		
Housing	Michael Winiarski		
15. List HQ/Field components involved in developing the document (drafts, discussions, etc.)			
16. Comments: This is a renewal request to OMB to revise a currently approved PRA collection. OPPAD is seeking clearance to publish the 60-day Federal Register Notice.			
17. Return this record to Vivian Herring		17a. Telephone Number x2591	17b. Room 9120

**U.S. DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT**

PRIVACY THRESHOLD ANALYSIS (PTA)

**Application for the Transfer of Physical
Assets**

2502-0275

**Office of Asset Management and Portfolio
Oversight**

Instruction & Template

9/7/2018

PRIVACY THRESHOLD ANALYSIS (PTA)

The PTA is a compliance form developed by the Privacy Branch to identify the use of Personally Identifiable Information (PII) across the Department. The PTA is the first step in the PII verification process, which focuses on these areas of inquiry:

- Purpose for the information,
- Type of information,
- Sensitivity of the information,
- Use of the information,
- And the risk to the information.

Please use the attached form to determine whether a Privacy and Civil Liberties Impact Assessment (PCLIA) is required under the E-Government Act of 2002 or a System of Record Notice (SORN) is required under the Privacy Act of 1974, as amended.

Please complete this form and send it to your program Privacy Liaison Officer (PLO). If you have no program Privacy Liaison Officer, please send the PTA to the HUD Privacy Branch:

John Bravacos, Senior Agency Official for Privacy
Privacy Branch
U.S. Department of Housing and Urban Development

privacy@hud.gov

Upon receipt from your program PLO, the HUD Privacy Branch will review this form. If a PCLIA or SORN is required, the HUD Privacy Branch will send you a copy of the PCLIA and SORN templates to complete and return.

PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	Application for Transfer of Physical Assets		
Program:	Office of Housing		
CSAM Name (if applicable):	N/A	CSAM Number (if applicable):	N/A
Type of Project or Program:	Form or other Information Collection	Project or program status:	Existing
Date first developed:	1992	Pilot launch date:	1992
Date of last PTA update:	10/15/2015	Pilot end date:	1992
ATO Status (if applicable)	Not started	ATO expiration date (if applicable):	N/A

PROJECT OR PROGRAM MANAGER

Name:	Harry Messner		
Office:	Housing; Multifamily Office of Asset Management and Portfolio Oversight	Title:	Program Analyst
Phone:	202-402-2626	Email:	harry.messner@hud.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	N/A		
Phone:	Click here to enter text.	Email:	Click here to enter text.

SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: Updated PTA

Extension of a currently approved collection

Form HUD 92266, is used when the sale and conveyance by deed to an insured mortgage necessitates a substitution of mortgagors, HUD approval of the substitution is required.

This is a renewal of OMB approval. There are no changes to the project, program, or system since the last version.

Forms HUD 92458 and HUD 2530 each are separately address in OMB approvals at 2502-0012 and 2502-0118 respectively

2. Does this system employ the following technologies?

If you are using these technologies and want coverage under the respective PIA for that technology, please stop here and contact the HUD Privacy Branch for further guidance.

- ☐ Social Media
- ☐ Web portal¹ (e.g., SharePoint)
- ☐ Contact Lists
- ☐ Public website (e.g. A website operated by HUD, contractor, or other organization on behalf of the HUD)
- ☒ None of these

3. From whom does the Project or Program collect, maintain, use, or disseminate information?

Please check all that apply.

- ☐ This program collects no personally identifiable information²
- ☐ Members of the public
- ☐ HUD employees/contractors (list programs):
- ☐ Contractors working on behalf of HUD
- ☐ Employees of other federal agencies
- ☒ Other (e.g. business entity)

¹ Informational and collaboration-based portals in operation at HUD and its programs that collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are "members" of the portal or "potential members" who seek to gain access to the portal.

² HUD defines personal information as "Personally Identifiable Information" or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. "Sensitive PII" is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.

4. What specific information about individuals is collected, generated or retained?	
Name, project number, project name, project purchaser name, lender/servicer name and address	
4(a) Does the project, program, or system retrieve information from the system about a U.S. Citizen or lawfully admitted permanent resident aliens by a personal identifier?	☒ No. Please continue to next question. ☐ Yes. If yes, please list all personal identifiers used:
4(b) Does the project, program, or system have an existing System of Records Notice (SORN) that has already been published in the Federal Register that covers the information collected?	☒ No. Please continue to next question. ☐ Yes. If yes, provide the system name and number, and the Federal Register citation(s) for the most recent complete notice and any subsequent notices reflecting amendment to the system
4(c) Has the project, program, or system undergone any significant changes since the SORN?	☒ No. Please continue to next question. ☐ Yes. If yes, please describe.
4(d) Does the project, program, or system use Social Security Numbers (SSN)?	☒ No. ☐ Yes.
4(e) If yes, please provide the specific legal authority and purpose for the collection of SSNs:	Not applicable.
4(f) If yes, please describe the uses of the SSNs within the project, program, or system:	Not applicable.
4(g) If this project, program, or system is an information technology/system, does it relate solely to infrastructure? <i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i>	☒ No. Please continue to next question. ☐ Yes. If a log kept of communication traffic, please answer this question.
4(h) If header or payload data ³ is stored in the communication traffic log, please detail the data elements stored.	
Click here to enter text.	

³ Header: Information that is placed before the actual data. The header normally contains a small number of bytes of control information, which is used to communicate important facts about the data that the message contains and how it is to be interpreted and used. It serves as the communication and control link between protocol elements on different devices.

Payload data: The actual data to be transmitted, often called the payload of the message (metaphorically borrowing a term from the space industry!) Most messages contain some data of one form or another, but some actually contain none: they are used only for control and communication purposes. For example, these may be used to set up or terminate a logical connection before data is sent.

5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?	☒ No. ☐ Yes. If yes, please list: Click here to enter text.
6. Does this project, program, or system connect, receive, or share PII with any external (non-HUD) partners or systems?	☒ No. ☐ Yes. If yes, please list: Click here to enter text.
6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?	Choose an item. Not applicable. Please describe applicable information sharing governance in place:
7. Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all HUD personnel?	☒ No. ☐ Yes. If yes, please list:
8. Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures of PII to individuals/agencies who have requested access to their PII?	☒ No. What steps will be taken to develop and maintain the accounting: ☐ Yes. In what format is the accounting maintained:
9. Is there a FIPS 199 determination?⁴	☒ Unknown. ☐ No. ☐ Yes. Please indicate the determinations for each of the following: Confidentiality: ☐ Low ☐ Moderate ☐ High Integrity: ☐ Low ☐ Moderate ☐ High Availability: ☐ Low ☐ Moderate ☐ High

PRIVACY THRESHOLD ANALYSIS REVIEW

⁴ FIPS 199 is the Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.

(TO BE COMPLETED BY PROGRAM PLO)

Program Privacy Liaison Reviewer:	Vivian Herring
Date submitted to Program Privacy Office:	April 17, 2019
Date submitted to HUD Privacy Branch:	April 17, 2019
Program Privacy Liaison Officer Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i> N/A	

(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)

HUD Privacy Branch Reviewer:	Cindy Etheridge
Date approved by HUD Privacy Branch:	December 7, 2018
PTA Expiration Date:	This PTA will suffice, however, if there are any changes, an update will be required.

DESIGNATION

Privacy Sensitive System:	No If "no" PTA adjudication is complete.
Category of System:	Form/Information Collection If "other" is selected, please describe: Click here to enter text.
Determination:	☒ PTA sufficient at this time. ☐ Privacy compliance documentation determination in progress. ☐ New information sharing arrangement is required. ☐ HUD Policy for Computer-Readable Extracts Containing Sensitive PII applies. ☒ Privacy Act Statement required. ☐ Privacy and Civil Liberties Impact Assessment (PCLIA) required. ☐ System of Records Notice (SORN) required. ☐ Paperwork Reduction Act (PRA) Clearance may be required. Contact your program PRA Officer. ☐ A Records Schedule may be required. Contact your program Records Officer.
PIA:	Choose an item. If covered by existing PCLIA, please list: Click here to enter text.
SORN:	Choose an item. If covered by existing SORN, please list: Click here to enter text.

HUD Privacy Branch Comments: Forms included in this collection are, HUD-92266, 92458, and 2530. HUD forms do not list SSN, however form 2530 has a privacy statement and states that The Housing and Community Development Act of 1987 requires persons applying for a Federally-insured or guaranteed loan to furnish his/her Social Security Number (SSN). HUD must have your SSN for identification of your records.

Please describe rationale for privacy compliance determination above.

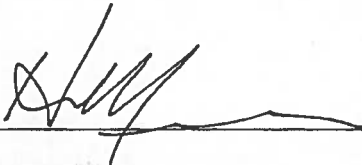
Click here to enter text.

DOCUMENT ENDORSMENT

DATE REVIEWED:

PRIVACY REVIEWING OFFICIALS NAME:

By signing below, you attest that the content captured in this document is accurate and complete and meet the requirements of applicable federal regulations and HUD internal policies.

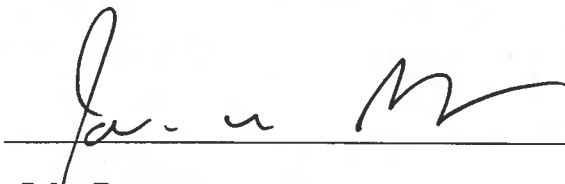


SYSTEM OWNER

<< Harry Messner>>

<< Office of Asset Management and Portfolio Oversight>>

9/7/2018
Date



John Bravacos

Senior Agency Official for Privacy

Privacy Branch

OFFICE OF ADMINISTRATION

4/22/19
Date

Supporting Statement for Paperwork Reduction Act Submissions
Title
OMB Control Number 2502-0275
(HUD-92266)

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. Include a statement regarding the changes for this submission. (Example: The changes for this submittal is as follows or the difference between this submission and the last is as follows....)

The Department of Housing and Urban Development (HUD) has both the authority and the duty to closely monitor the operation of the properties encumbered by mortgages insured or held by HUD. When the sale and conveyance by deed to an insured mortgage necessitates a substitution of mortgagors, HUD approval of the substitution is required. The duty to perform this function stems from HUD's responsibility to the taxpayers to guard the insurance fund, which includes anticipating and identify problems (e.g., physical, financial, managerial, legal) with a project prior to a potential delinquency and ultimately assignment of the mortgage. There are no changes from the previous submittal.

The authority for this function can be found in 12 USC 1701z-11, Management and disposition of multifamily housing projects, HUD's regulations at 24 CFR Part 200, and in the Regulatory Agreements between the HUD and the mortgagor of the multifamily housing property.

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 transfer of physical assets application and supporting documentation provide the Department with a vehicle for reviewing all aspects of transfers of physical assets prior to the point at which they become effective. Therefore, HUD must be intricately involved at the time of the transfer to ensure that:

- The applicant purchaser is an acceptable replacement to own and operate a project encumbered by a HUD-insured or HUD-held mortgage.
- The project is not placed in physical, financial or managerial jeopardy by the transfer.

- The changes effected at the project because of the transfer are not contrary to the interest of HUD and the tenants.
- The legal and operational terms of the transfer are not in violation of the statutes, regulations, HUD policies and binding legal contracts applicable to a project;
- The project is the recipient of its fair share of any money changing hands as consideration of the transfer;
- The project and HUD are not exploited during the vulnerable period of transfer.
- The physical and financial needs of the project are adequately addressed to minimize the risk of subsequent physical deterioration and financial damage at the project.

To ensure that HUD's interests are adequately protected, HUD staff will review and approve the new owners and management agents and the terms and conditions proposed in the transfer prior to implementation. HUD reviews each transfer of physical assets proposal for legal and administrative sufficiency. The administrative information collected pursuant to form HUD-92266 Application for Transfer of Physical Assets provides HUD with insight into the purchaser and their ability to own and operate the project effectively.

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 collection will not be automated due to the collection of documents necessary for this submission. The transfer of physical assets process requires submitting narrative documents to HUD in support of the transaction which are wholly outside of HUD's control.

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 form collection is unique and used only when a current owner applies for permission to transfer that ownership to another entity.

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 collection of this information does not impact small businesses or other small entities.

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 were collected less frequently, HUD would be unable to monitor the operation of its multifamily housing portfolio, resulting in a significantly increased risk to the FHA insurance fund.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner: (PLEASE ANSWER EACH BULLET SEPARATELY)

*** requiring respondents to report information to the agency more often than quarterly;**

There is no requirement for respondents to report the information more 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 a 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 that can be generalized to the universe of study;**

This collection is not produced in connection with a statistical survey.

*** 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 classification.

*** 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**

There is no pledge of confidentiality that is not supported by authority established in statute or regulation.

*** 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.**

There is no requirement for respondents to submit proprietary trade secret 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. 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 on the data elements to be recorded, disclosed, or reported. 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 may preclude consultation in a specific situation. These circumstances should be explained.

In accordance with 5CFR 1320.8(d), this information collection soliciting public comments was announced in the Federal Register on XXX, Volume XX, No. XXX, Pages XXXXX. No Comments received.

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

No gifts or payments of any kind are provided to respondents, other than remuneration of contractors or grantees.

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

No assurance of confidentiality is provided to respondents.

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 involved 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 for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

* 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.

Information Collection	Number of Respondents ¹	Frequency of Response ²	Responses Per Year	Average Burden Hours Per Response	Annual Burden Hours	Hourly Cost per Response ³	Total Annual Cost
HUD-92266	27,127	1	543	8	4,340	35.58	\$154,429
TOTALS	27,127		543		4,340		\$154,429

¹ Number of respondents is based on the current inventory of projects that are HUD-insured and HUD-Held.

²The number of annual responses is based on an estimate of 2% of potential transfer of physical assets applications received on an annual basis.

³ Hourly cost is based on an estimate of the potential owner's staff to gather, complete, and submit the required documents to HUD for review and approval. Hourly estimated costs estimate obtained from payscale.com.

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown 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 and 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 collections 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.

Data gathered by respondents for this collection consists of information and records used for business reasons, and not necessarily to provide responses to the government. The data provided constitutes customary and usual business or private practices.

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.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Year	Burden Hours Per Response	Annual Burden Hours	Hourly Cost per Response	Total Annual Cost
HUD-92266	27,127	1	543	0.33	179	30.47	\$5,455
TOTALS	27,127		543		179		\$5,455

¹ Estimated cost per hour for HUD staff (GS-12) to review and process the documents for this collection. Data was obtained from www.opm.gov for the 2012 general scale/hourly rates.

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

This is an extension of a currently approved collection. The change in inventory in item 13 of page 1 reflects project owners that paid or prepaid their mortgage and no longer have a regulatory requirement to report to the Department, and newly insured projects that have been added to the portfolio since last report.

Burden hours reflects a correction from earlier reports which addressed every attachment needed to complete a transfer of physical assets. In fact, those attachments are separately addressed in other OMB approvals. Including them in this request amounts to double-counting those attachments and unrealistically inflates the burden hours count for use of the form HUD-92266.

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.

Collection of this information will not be published.

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 not display the expiration date for OMB approval of the information collection.

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 identified in Item #19 on form OMB 83-I, "Certification for Paperwork Reduction Act Submissions."

B. Collections of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked, "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

2. Describe the procedures for the collection of information including:

- * Statistical methodology for stratification and sample selection,
- * Estimation procedure,
- * Degree of accuracy needed for the purpose described in the justification,
- * Unusual problems requiring specialized sampling procedures, and
- * Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of test may be submitted for approval separately or in combination with the main collection of information.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.