March 15, 2012

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

Re: Notice of Submission of Proposed Information Collection to OMB; Capture Energy Efficiency Measures for PIH (CEEMP) (Docket No. FR-5603-N-10)

On behalf of the National Association of Housing and Redevelopment Officials (NAHRO), I am writing to submit comments in response to the Department’s notice regarding a proposed information collection related to Public Housing Authority efforts to implement energy conservation measures in their public housing portfolios (2577-New). NAHRO represents more than 3,100 agencies and over 19,000 individual members and associates. Collectively, our membership manages over 970,000 public housing units, or approximately 83 percent of the entire inventory. Not surprisingly, our membership has serious concerns regarding the Department’s proposal.

Although NAHRO appreciates HUD’s efforts to promote environmental sustainability and energy conservation improvements in the nation’s affordable housing portfolio, we are mindful of the tremendous reporting burdens already faced by PHAs. The request for public comment seeks, among other purposes to evaluate whether the proposed collection of information is necessary, including whether the information will have practical utility. The Federal Register notices says “the CEEMP data system is necessary in order to support the Department’s Agency Performance Goals (APGs), specifically APG #13 which sets precise targets for completing green retrofits and creating energy efficient units.” NAHRO believes that the creation of an additional collection such as the one proposed actually creates additional obstacles to achieving the very goal it is intended to support. By forcing PHAs to complete yet another report, this information collection would further divert resources away from pursuing the betterment of public housing units. In the face of severely diminishing Capital Funds, it is particularly important to minimize administrative burdens.

The Department already collects a variety of different data on the physical needs of public housing as well as capital improvement plans at the individual PHA level. These reporting requirements have already increased dramatically with the enactment of a standardized Physical Needs Assessment, which includes a subsection focusing on green and energy efficient needs. HUD is also in the process of implementing more stringent energy audit requirements for PHAs, the product of which could be used to inform HUD’s data needs. By comparing the needs identified on each PHA’s PNA with the one submitted in the prior year, HUD could draw
sufficient data to assess progress towards its performance goals. In addition, the Department could utilize information from the PHA plans and Capital Fund plans that PHAs already submit.

As stated previously, NAHRO doubts that possession of this specialized data would actually help the Department to achieve its goal. Given the existing backlog, estimated at $26 billion, of unmet capital needs in the public housing stock, sound public policy simply cannot require that PHAs do more to “green” properties at the expense of other improvements to critical components and systems such as roofs or boilers. In other words, even if this data collection showed that HUD is far from reaching its target, requiring PHAs to prioritize “greening” would simply not be an appropriate policy remedy. As such, this information would be “nice to know,” but would likely not result in any corresponding action based on findings.

The request for public comment also seeks to minimize the burden of the collection of information on those who are to respond. Although our preferred avenue would be for the Department to utilize existing information sources to gather data on the implementation of energy conservation measures in public housing, we offer the possibility of an annual, rather than quarterly, collection as an alternative. Given the relatively slow pace of capital projects, quarterly reports are simply unnecessary, and most PHAs would have no new information to provide on a quarterly report. Annual reports, provided based on the PHA fiscal year end, would allow data to flow into HUD on a quarterly basis and would minimize the burden on responding PHAs.

We appreciate the opportunity to provide comments on this proposed information collection, and look forward to continuing to work with the Department to maintain a streamlined, efficient operating environment in which PHAs can continue to serve their residents and communities.

Sincerely,

Tamar Greenspan
Policy Advisor