Streamlined Annual PHA Plan (High Performer PHAs) U.S. Department of Housing and Urban Development Office of Public and Indian Housing U.S. Department of Housing and Urban Development Office of Public and Indian Housing U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires: 02/29/2016

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA <u>do not</u> need to submit this form.

Definitions.

- (1) High-Performer PHA A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) Small PHA A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) Housing Choice Voucher (HCV) Only PHA A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment, and does not own or manage public housing.
- (4) **Standard PHA** A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) Troubled PHA A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) Qualified PHA A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

Α.	PHA Information.						
A.1	PHA Name: Housing Author PHA Type: ☐ Small ☐ F			PH	A Code : <u>SC027</u>		
	PHA Plan for Fiscal Year B		/YYYY): <u>10/2017</u> ons Contract (ACC) units at time of	f FV heginning above)			
	Number of Public Housing (sing Choice Vouchers (HCVs)	<u>772</u>		
	Total Combined <u>1550</u> PHA Plan Submission Type	: Annual Su	bmission Revised An	nual Submission			
	Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. Annual Agency Plan is available at our Central Office Cost Center, our Church Hill Admin office, our Parkview Plaza Admin office and our Creekside Village Admin Office.						
	Portiginating PHAs PHA Code Program(s) in the Concertie 118111111111111111111111111111111111					s in Each Program	
			· · · · · · · · · · · · · · · · · · ·	Consortia	PH	HCV	
	Lead PHA:						

В.	Annual Plan Elements
B.1	Revision of PHA Plan Elements.
	(a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission?
	N Statement of Housing Needs and Strategy for Addressing Housing Needs. Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. Financial Resources. Financial Resources. Financial Resources. Homeownership Programs. Safety and Crime Prevention. Pet Policy. Significant Amendment/Modification. (See Attachment SC027h01). See Attachment SC027h01. See Attachment SC027h01. See Attachment SC027h01. Safety and Crime Programs - Executed an agreement with Pee Dee Coalition to assist in placing victims of domestic violence back into the community. Pet Policy - Revisions were made to the Pet Policy in the Admissions & Continued Occupancy Policy (A.C.O.P.) based on the Fair Housing regulations.

B.2	New Activities.
	(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?
	Y N
	(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.
	Mixed Finance Modernization or Development
	We previously submitted our application and were approved for Disposition of Royal Gardens, SC27-1 (all 50 units); We then submitted an application and were approved to build 36 LIHTC units which were completed in October 2012 (Phase I of McGowan Commons) utilizing both the existing property of Royal Gardens (just a sliver) as well as utilizing additional purchased property surrounding the area which was included in the mixed financing venture.
	We are now moving through the next step(s) necessary to provide a mixed financed housing community in that area of the city.
	Our plans for PHASE II have been revised. The construction of twenty (20) public housing elderly units (Public Housing Project SC27-30) has been completed. We will be using a portion of the Royal Garden' property as well as purchasing an additional piece of adjacent property from our Non-Profit (Palmetto Housing Corporation).
	We still have plans for a PHASE III (McGowan Commons) for some family units with mixed financing and possibly a PHASE IV (McGowan Commons) at this same location.
	Demolition and/or Disposition We currently have four (4) vacant lots (SC027-20) which have been HUD approved for disposition/demolition but final paperwork for the actual disposition has not yet been completed. We plan to explore possibilities for additional housing. We anticipate that there may be a need for one to two additional applications for DeMinimus Demolition/Demo/Disposition depending on structure issues and the PNA.
	Project-Based Vouchers We have 8 Project-based Vouchers at McGowan Commons which were part of PHASE I. We plan to use approximately 8 – 20 Project based vouchers at McGowan Commons during PHASE III possibly. Also, we are applying for VASH PBV.
	Units with Approved Vacancies for Modernization
	Under the Capital Fund Grant some modernization work may require taking units offline to complete.
	Other Capital Grant Programs
	We plan to apply for Security Grant.
	Other New Activities or a continuing consideration:
	1. We also plan to explore possibilities of a Transfer/Conversion of Public Housing from one or more of our small sites to the Housing Authority of Florence and if it is in the best interest of all parties, the transfer will be processed.
	2. Authority wide we will be addressing/implementing "designation of buildings" pursuant with HUD regulations. First, we plan to explore possibilities of converting SC27-12 (Creekside Village) to an Elderly Project and if financially feasible we will make the conversion.
	3. We have completed our GPNA and spreadsheets. Based on the results we plan to incorporate them into a 20-year plan with a "vision" for the greatest possible achievement for the future. This includes, but is not limited to, addressing/meeting 504/ADA needs/requirements; including green needs; including visitability; possibly purchasing additional property; partnering for investments/funding; etc.

- 4. Authority wide we will be reevaluating the RAD program, if financially feasible and HUD qualified/approved.
- 5. Authority wide we will consider and evaluate a non-smoking policy, we will follow all mandated HUD requirements.
- 6. Authority wide we will include a facilities management Salary study.

Homeownership Program

Additionally, a HUD Homeownership Program is not applicable but may be explored if there is a need, and if it is determined to be in our best interest to pursue this avenue, if it is financially feasible and HUD qualified/approved we will move forward.

B.3 Progress Report.

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.

Progress Report:

HUD approved Five-Year Goals for the period 2015-2019 are listed below:

• Explore efforts to improve management functions.

We have taken steps to restructure the facilities management area. With the resignation/termination of the majority of employees assigned to this area, we evaluated the needs and decided to restructure in the best interest of the Housing Authority. We are still in the process and are making adjustments as needed.

 Explore opportunities to expand leveraging private or other public funds to create additional housing opportunities.

We have met with agencies, organizations and the City in an effort to develop partnerships that will enable the Housing Authority to become involved in the improvement of the CDBG targeted area of Florence i.e. commercial/retail/additional assisted housing. In the CDBG targeted area of Florence, we have constructed twenty (20) units of elderly public housing. We are continuing to work with the City to improve this CDBG targeted area. We have purchased adjacent property through our closely held Non-Profit. On one of these sites was a dilapidated convenience store which we have demolished and are doing preliminary research into developing this area. We continue to provide additional housing opportunities for mental health participants through the management of Pee Dee Place (19 units) and Pelican House (202 Program). We provide affordable housing opportunities for forty six (46) elderly residents.

• Continue to renovate or modernize public housing units to make them more marketable.

We installed vinyl siding on three of our AMPs, SC27-3, SC27-4, SC27-5 and 27-21 totaling 290 public housing units this past year. We have had one of our single family homes destroyed by fire. We plan to rebuild as a fully handicap accessible unit.

• Explore/implement Public Housing or other homeownership opportunities.

No progress this year.

Demolish or dispose of obsolete public housing.

We are reviewing possible demolition/disposition of obsolete public housing where needed.

Continue to comply with Asset Management Regulations.

We continue to comply with maintaining current policies and procedures and focusing on our goals. We maintain the designation as a High Performer and have sustained that designation since its inception. We are proud of this.

Continue to provide staff training to improve the quality of Assisted Housing.

We continue to provide extensive on-going staff training through workshops, tech schools and adult education, on-site training, and other educational facilities.

•	Explore opp	ortunities to	conduct outre	ach efforts to	potential	voucher	landlords.
---	-------------	---------------	---------------	----------------	-----------	---------	------------

Continue to provide counseling and have a video presentation as part of our briefing packet as well as on-going information to current clients. We also encourage landlord participation through outreach efforts, making them aware of the program advantages through workshops and mail outs. All potential landlords are required to attend a workshop on the voucher program before their property can be listed on our property listings provided to Section 8 applicants/tenants (participants). We continue to conduct outreach and plans are underway for a Landlord Fair.

Continue to manage LIHTC property and to expand the other housing opportunities.

Continue to manage LIHTC property and researching opportunities to expand other housing opportunities.

Continue to collaborate with other entities to provide affordable housing.

The Housing Authority of Florence continues to collaborate with other entities to provide affordable housing through the management of three other Housing Authorities, other Non-Profits, other tax credit properties, two of which we share ownership.

Promote/attract supportive services to improve assistance in recipients' employability.

Encourage scholarship participation through CCHRCO opportunities and assist with process; Partner with Florence School District 1 to provide training for parents and programs for children

Explore opportunities for residents' self-sufficiency and economic independence.

Partner with Florence School District 1 to provide training for parents and programs for children at our largest Public Housing site. Recipient of ROSS Grant FSS 2016 Implementation.

• Maintain problem-solving partnerships with PHA, residents, community, and government leadership.

We continue to partner with other Housing Authorities (workshops, training, sharing of information), community (non-profits), and government leadership (Mayor has been involved in our efforts to transform an obsolete community of public housing to a mixed finance project in the CDBG targeted area of the city; also involved in demolishing abandoned/dilapidated homes to clean up the communities.)

D 4	
	١.

Most Recent Fiscal Year Audit.

(a) Were there any findings in the most recent FY Audit?

Y N

(b) If yes, please describe:

Other Document and/or Certification Requirements.

C.1 Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan

Form 50077-ST-HCV-HP, Certification of Compliance with PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan. See Attachment SC027c01.

C.2 | Civil Rights Certification.

Form 50077-ST-HCV-HP, Certification of Compliance with PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan. See Attachment SC027c01.

C.3	Resident Advisory Board (RAB) Comments.
	(a) Did the RAB(s) provide comments to the PHA Plan?
	Y N □ ☑ If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. See Attachment SC027e01.
C.4	Certification by State or Local Officials. Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan. See Attachment SC027d01.
D	Statement of Capital Improvements . Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).
D.1	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD. See HUD Form 50075.2 approved by HUD on 05/20/16.

- E. Challenged Elements. See Attachment SC027f01.
- F. Violence Against Women Act (VAWA) Requirements. See Attachment SC027g01.
- $G. \qquad Substantial\ Deviation\ and\ Significant\ Amendment\ or\ Modification.\ See\ Attachment\ SC027h01.$

Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing PHAs

- PHA Information. All PHAs must complete this section.
 - A.1 Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

В. An

B.1	Revision	of PHA	Plan	Elements.	PHAs	must:

ın	nual Plan.				
1	Revision of PHA Plan Elements. PHAs must:				
	Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no."				
	□ Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA's public housing and Section 8 tenant-based assistance waiting lists. 24 CFR §903.7(a)(2)(ii) and 24 CFR §903.12(b).				
	Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions. Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. 24 CFR §903.7(b) Describe the PHA's procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. 24 CFR §903.7(b) A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b) Describe the unit assignment policies for public housing. 24 CFR §903.7(b)				
	Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c)				
	☐ Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d)				
	☐ Homeownership Programs . A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. (24 CFR §903.7(k) and 24 CFR §903.12(b).				
	☐ Safety and Crime Prevention (VAWA). A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))				
	Pet Policy. Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))				
	☐ Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i)				
	☐ Significant Amendment/Modification . PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. Should the PHA fail to define 'significant amendment/modification', HUD will consider the following to be 'significant amendments or modifications': a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency public housing CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan); or c) any change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD's website at: Notice PIH 1999-51. (24 CFR §903.7(r)(2)(ii)				
	If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.				

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

D.2	for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."
	☐ Hope VI. 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on
	HUD's website at: http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm. (Notice PIH 2010-30)
	☐ Mixed Finance Modernization or Development. 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at:
	http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm. (Notice PIH 2010-30)
	Demolition and/or Disposition. Describe any public housing projects owned by the PHA and subject to ACCs (including name, project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed. The application and approval process for demolition and/or disposition is a separate process. So guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm . (24 CFR §903.7(h))
	Conversion of Public Housing. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance
	on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/conversion.cfm. (24 CFR §903.7(j))
	Project-Based Vouchers. Describe any plans to use HCVs for new project-based vouchers. (24 CFR §983.57(b)(1)) If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.
	Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).
B.3	Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))
B.4	Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those

New Activities. If the DHA intends to undertake any new activities related to these elements or discretionary policies in the current Fiscal Vear, mark "was

C. Other Document and/or Certification Requirements

findings in the space provided. (24 CFR §903.7(p))

- C.1 Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 SM-HP.
- C.2 Civil Rights Certification. Form HUD-50077 SM-HP, PHA Certifications of Compliance with the PHA Plans and Related Regulation, must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o))
- C.3 Resident Advisory Board (RAB) comments. If the RAB provided comments to the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)
- C.4 Certification by State or Local Officials. Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15)
- D. Statement of Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR 903.7 (g))
 - D.1 Capital Improvements. In order to comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan. PHAs can reference the form by including the following language in Section C. 8.0 of the PHA Plan Template: "See HUD Form 50075.2 approved by HUD on XX/XX/XXXX."

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 16.64 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.