# **Paperwork Reduction Act Submission**

Please read the instruction before completing this form. For additional forms or assistance in completing this forms, contact your agency's Paperwork Reduction Officer. Send two copies of this form, the collection instrument to be reviewed, the Supporting Statement, and any additional documentation to: Office of Information and Regulatory Affairs, Office of Management and Budget, Docket Library, Room 10102, 725 Seventeenth St. NW, Washington, DC 20503.

Agency/Subagency Originating Request:     U.S. Department of Housing and Urban Development     Office of Rubbic and Indian Housing	2. OMB Control Number: a. <b>2577-0229</b> b. None
Office of Public and Indian Housing	
3. Type of information collection: (check one) a. New Collection b. Revision of a currently approved collection c. Extension of a currently approved collection d. Reinstatement, without change, of previously approved collection for which approval has expired e. Reinstatement, with change, of previously approved collection for which approval has expired for which approval has expired f. Existing collection in use without an OMB control number For b-f, note item A2 of Supporting Statement instructions.	4. Type of review requested: (check one)  a. Regular  b. Emergency - Approval requested by  c. Delegated  5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities?  Yes No  6. Requested expiration date:  a. Three years from approval date b. Other (specify)
7. Title: Application for the Resident Opportunities and Self Suffi	ciency (ROSS) program
424, HUD-424-CB, HUD-424-CBW, HUD-2880, HUD-2990, I	755, HUD-52756, HUD-52757, HUD-52763, HUD-52764, HUD-52767, SF-HUD-2991, SF-LLL, HUD-27300, HUD-96010 tive services, self-sufficiency, welfare to work, independent living, funding,
Delivery Models-Elderly/Persons with Disabilities, and	
<ul> <li>11. Affected public: (mark primary with "P" and all others that apply with "X")</li> <li>a. Individuals or households e. Farms</li> <li>b. Business or other for-profit f. Federal Government</li> <li>c. X Not-for-profit institutions g. P State, Local or Tribal Government</li> </ul>	12. Obligation to respond: (mark primary with "P" and all others that apply with "X")  a. Voluntary  b. P Required to obtain or retain benefils  c. Mandatory
13. Annual reporting and recordkeeping hour burden:  a. Number of respondents  b. Total annual responses  Percentage of these responses collected electronically  c. Total annual hours requested  d. Current OMB inventory  e. Difference (+,-)  f. Explanation of difference:  1. Program change:  25,92  2. Adjustment:  55	a. Total annualized capital/startup costs  b. Total annual costs (O&M)  c. Total annualized cost requested  d. Current OMB inventory  e. Difference  f. Explanation of difference:  1. Program change:
15. Purpose of Information collection: (mark primary with "P" and all others that with "X")  a. P Application for benefits e. Program planning or manage b. X Program evaluation f. Research c. General purpose statistics g. X Requilatory or compliance d. Audit	a. Recordkeeping b. Third party disclosure
17. Statistical methods:  Does this information collection employ statistical methods?  Yes No	.8. Agency contact: (person who can best answer questions regarding the content of this submission)  Name: Dina Lehmann-Kim  Phone: 202-401-8812 ext. 2430

## 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;

Signature of Program Official:

Signature of Senior Officer or Designee:

- (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

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(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.

Date:

Date:

X		

## **Supporting Statement for Paperwork Reduction Act Submissions**

#### A. Justification

1. Section 538 of the Public Housing Reform Act (Pub. L. 105-276, 112 Stat. 2461, approved October 21, 1998) added a new section 34 to the U.S. Housing Act of 1937 which provides a mandate to link supportive services to help public housing residents achieve economic self-sufficiency. The Resident Opportunities and Self-Sufficiency (ROSS) Program responds to this requirement by providing funding to Public Housing Authorities, Tribes/Tribally Designated Housing Entities, resident organizations, and qualified nonprofit organizations to provide a comprehensive array of educational and supportive services.

Interested parties submit one application for the following grant categories: Resident Service Delivery Models-Family/Homeownership, Resident Service Delivery Models-Elderly/Persons with Disabilities, and Family Self-Sufficiency for Public Housing.

All applicants to the ROSS program must: describe the activities they will undertake; include a work plan with a timeline for their activities; indicate their expected outputs and outcomes; provide a budget; and indicate in the case of nonprofit applicants which resident groups support their application (per Congressional statute). The ROSS forms help the Department evaluate (rate and rank) applicants so that HUD can determine how well applicants will meet these programmatic requirements.

- 2. The information provided to HUD by the eligible applicants will be reviewed and evaluated by HUD. Using a comprehensive, merit-based selection process, HUD will determine which organizations should receive awards under the ROSS program.
- 3. All applicants, unless granted a waiver, must submit grant applications electronically to HUD via the <a href="www.grants.gov">www.grants.gov</a> web site. This does not necessarily reduce the reporting burden as the information required for submission is the same as that required when paper applications were submitted. However, the forms used to collect this information have been converted to an electronic format which may make it easier for applicants to use and less burdensome to submit.
- 4. There is no duplication of information. HUD standard forms used with the SuperNOFA do not ask questions that are specific enough for the program area to evaluate applicants' eligibility, applicants' full capacity, organizational composition, viablility of their proposal, and experience of relevant staff. For this reason, forms specific to the ROSS program have been developed. Without the information gathered in these forms, the Department would not be able to fully evaluate applicants' capacity to run an effective program and administer federal funds.
- 5. The information being collected has no significant impact on small businesses or other small entities. All eligible applicants will submit the same forms, certifications, and assurances.
- 6. ROSS-specific forms (HUD-52751, HUD-52752, HUD-52753, HUD-52754, HUD-52755, HUD-52756, HUD-52757, HUD-52763, HUD-52764, and HUD-52767) are collected on a one-time basis. Less frequent collection is not possible as applicants apply for funding only once a year. This information must be collected to allow HUD to rate and rank applications for grant funding. Not collecting this information would make it impossible to assess which organizations are best equipped and most deserving to receive funding. These forms allow HUD to get a complete picture of each applicant and are a vital tool the Department uses to ensure that funding is awarded to the best and most qualified organizations.
- 7. There are no special circumstances that require the collection to be conducted in a manner which is inconsistent with the guidelines in 5 CFR 1320.

- 8. A Federal Register Notice of Proposed Information Collection was published on October 3, 2006 (pages 58424-58425). The public comment period ended December 4, 2006. No public comments were received.
- 9. No payment or gift will be provided to respondents.
- 10. No assurance of confidentiality is provided.
- 11. No sensitive questions are being asked.
- 12. We estimate the information collection requirements of the ROSS NOFA will have the following reporting burden:

Description of Information Collection	Number of Respondents	Responses per Year	Total Annual Responses	Hrs per Response	Total Hour
HUD-52751 (Fact Sheet)	450	1	450	2	900
HUD-52752 (Cert. with Indian Hsng. Plan)	650	1	650	15 min.	162.5
HUD-52753 (Cert. Resid. Board Election)	450	1	450	1	450
HUD-52754 (List of Resid. Assoc. Supporting Nonprofit Applicants)	450	1	450	15 min.	112.5
HUD-52755 (Sample Contract Admin. Partnership Agreement)	450	1	450	Sample (N/A)	N/A
HUD-52756 (Chart A: Program Staffing)	450	1	450	2	900
HUD-52757 (Chart B: Applicant/Admin. Track Record)	450	1	450	2	900
HUD-52763 (ROSS-Family Sample Work Plan)	300	1	300	4	1200
HUD-52764 (ROSS-Elderly Sample Work Plan)	150	1	150	4	600
HUD-52767 (ROSS/FSS Funding Request Form)	200	1	200	4	800
SF-424	650	1	650	0.75	487.5
SF-424 Supplement, Survey on Ensuring Equal Opportunity for Applicants	650	1	650	.1	65
HUD-424-CB	650	1	650	2.60	1690
HUD-424-CBW	650	1	650	3.2	2080
HUD-2880- Applicant Disclosure/ Update Report (2510-0011)	650	1	650	0	0
HUD-2990-Certification of Consistency with RC/EZ/EC	650	1	650	0	0
HUD-2991 – Certification of Consistency with Consolidated Plan	650	1	650	0	0
SF-LLL-Disclosure of Lobbying Activities	650	1	650	0.17	110.5
HUD-27300 - Removal of Regulatory Barriers	650	1	650	0	0
HUD 96010 – Logic Model (2535- 0114)	650	1	650	0	0
Subtotal (Application)	650	1	650	Varies	10,458

HUD-1044 – Grant Agreement*	650	1	650	N/A	N/A
Semi-Annual Report (Narrative)	650	2	650	Varies	N/A
Subtotal (Program Reporting/Recordkeeping)					
Total	650	3	1950	Varies	N/A

The burden hours were estimated by HUD staff who completed a package of forms. The burden hours for each grant category is composed of estimated burden hours for the forms required by HUD's SuperNOFA as well as the number of estimated hours it would take to complete ROSS-specific forms. For example, the total estimated burden hours for the ROSS RSDM-Family program would be 3,450 hours (for ROSS-Family forms) plus 2,046 hours (for the SuperNOFA forms which are shaded in the chart above) for a total of 5,496 burden hours. The number of burden hours for the RSDM-Elderly program would be 1,725 burden hours for the ROSS forms plus 1,023 hours (for SuperNOFA forms) for a total of 2,748 burden hours. Fewer forms are required for the FSS program, the burden hours for this program would be 850 for the FSS forms plus 1,364 for the SuperNOFA forms for a total of 2,214 hours. The sum total burden hours for all three programs is 10,458 as indicated in the above chart.

- \*HUD-1044, Assistance Award/Amendment is completed by HUD staff, signed by the recipient of the grant, and returned to HUD. This form is a certification and HUD ascribes no burden to its use.
- 13. There will be no additional costs to the respondents. Application preparation and submission are part of the regular operation of Housing Authorities, Tribes, nonprofits, and resident organizations.
- 14. There will be no additional costs to the Federal Government. HUD's Grants Management Center receives, processes, reviews and recommends approval/denial of applications for grant funding.
- 15. This collection package is a revision to an approved currently collection for which approval will expire. The burden hours previously reported were 41,643. The burden decreased by 31,185 hours due to the elimination of several forms used in prior years and a decrease in the number of respondents. The burden hours were estimated by HUD staff who completed sample packages of forms. Standard grant forms, which have always been part of the application but were not listed separately are now included in Items 12's table.
- 16. Only the grants awarded and their amounts will be published in the Federal Register as required by the 1989 Reform Act.
- 17. The OMB approval will be displayed in the grant announcement (SuperNOFA).
- 18. There are no exceptions to the certification statement identified in item 19 of the SF 83-i.

#### **B. Collection of Information Employing Statistical Methods**

This information will not be collected using statistical methods.