March 19, 2007

SUPPORTING STATEMENT

7 CFR Part 3551, “Mutual and Self-Help Housing Program”

A. Justification

1. Explain the circumstances that make the collection of information necessary.

The Rural Housing Service (RHS) is the credit Agency for rural housing and community development within the Rural Development mission area of the United States Department of Agriculture. RHS was formerly known as Rural Housing and Community Development Service (RHCDS), which was a successor Agency to the Farmers Home Administration.

This regulation prescribes the policies and responsibilities, including the collection and use of information, necessary to administer the Section 523 Mutual and Self-Help Housing (MSH) program. This program affords very low and low income families the opportunity for home ownership by constructing their own homes. The MSH program provides funds to non-profit organizations to provide supervisory and technical assistance to the homebuilding families. Two types of funds are available under the MSH program:

- *Technical assistance grants* support programs of technical and supervisory assistance that allow grantees to identify, organize, and help families obtain financing and build their homes; and

- *Predevelopment grants* assist organizations that need financial and technical assistance to put together a technical assistance grant application package; and

Both public and private non-profit organizations are eligible to administer these programs. RHS has the responsibility to assure that the non-profit organizations receiving MSH funding are effectively utilizing these funds to promote and carry out the program in their respective rural areas or small towns.

The information requested by the Agency includes financial and organizational information about the non-profit organization. This information is vital for the Agency to determine if the organization will qualify for MSH assistance, and, if funding is awarded, to determine whether funds are administered in accordance with the program regulations.

2. <u>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.</u>

The Agency will be collecting information from the non-profit organizations that want to develop a MSH program in their area to increase the availability of affordable housing. The information is collected at the local, district, and state levels and under the Freedom of Information Act, the general public can request a majority of the information requested of the applicant organization except information that is confidential and included under provisions of the Privacy Act. The information is needed by the Agency to determine if the organization is capable of successfully carrying out the requirements of the MSH program. The information is collected on an as requested or needed basis. The Agency has reviewed the program's need for the collection of information versus the burden placed on the public. It is the opinion of the Agency that the program's needs are necessary and will be beneficial to all parties involved to provide MSH housing programs that will create affordable housing in rural areas.

The specific burden of information to be cleared includes the following:

FORMS CLEARED IN THIS DOCKET

<u>NONE</u>

REPORTING REQUIREMENTS-NON FORM

- <u>Evidence of Capacity to Operate a MSH Program</u>

The Mutual and Self-Help Housing Technical Assistance Grant Program is highly specialized. It is a program involving both home construction and educational activities. Faced with limited resources, the grant recipients must locate, organize, and educate families of low-socioeconomic means to be responsible homeowners. Therefore, all applicants for technical assistance grants and predevelopment grants must demonstrate that they have sufficient experience to properly implement the grant.

Applicants must provide documentation that they have sufficient financial, legal, and administrative capacity to operate a MSH program. Applicants for technical assistance grants who have established this capacity through a predevelopment grant application approved within the previous grant cycle or who are existing grantees with at least a satisfactory rating on their most recent grantee evaluation are exempt from this requirement.

Demonstrating Administrative Capacity - Although applicants may have a variety of staffing plans and position titles, several roles are essential for all MSH programs – program administrator, funds administrator, construction supervisor, and program recruiter. The applicant must provide a staffing plan that explains how the organization will staff these roles. In most instances, applicants should provide the names of the individuals who will fill these roles and copies of their resumes or similar summaries of experience. New applicants or existing grantees that are experiencing staff turnover may provide detailed job descriptions in lieu of resumes.

Demonstrating Financial Capacity - To demonstrate financial capacity, applicants must provide the following:

- A copy of their most recent audit;
- A commercial credit report will be ordered by the Agency on behalf of the applicant;
- Their organizational budget for the current fiscal year;
- A summary of the organization's financial management and accounting system; and
- A disclosure statement stating whether the organization or key staff members are currently facing civil or criminal litigation.

The annual estimated burden: Man-hours: 460
Dollars: $8,975

- Organizational Documents

Each technical assistance grant and predevelopment grant applicant is required to submit organizational papers, most of which the applicant should already have on hand. This requirement allows the Agency to review the papers for items that might be in conflict with various laws and policy (e.g., verification of non-profit status). Applicants must provide the following documents unless the applicant is an existing grantee and the item has not changed since last submitted to the Agency:

- A copy of, or accurate reference to, the specific provisions of state law under which the applicant is organized (This is required only for technical assistance grant applicants and not for predevelopment grant applicants);
- A certified copy of the applicant's Articles of Incorporation and Bylaws or other evidence of corporate existence;
- A certificate of incorporation (if not a public body);
- A tax exempt certification under IRS 501(c)(3) or 501(c)(4) (if not a public body);
- Certification from the state in which the grant is to be awarded that the applicant is in good standing (if not a public body); and
- The names and addresses of the applicant's members, directors, and officers.

The annual estimated burden: Man-hours: 299
Dollars: $5,833

- <u>Financial Statement</u>

All applicants for technical assistance grants and predevelopment grants must submit a dated and signed financial statement no more than 12 months old. The financial statement must show the amounts and specific nature of the assets and liabilities together with information on the repayment schedule and status of any debt incurred by the applicant.

The annual estimated burden: Man-hours: 460
Dollars: $8,975

- <u>Commercial Credit Report</u>

All applicants for technical assistance grants and predevelopment grants must submit a processing fee to the Agency for ordering a commercial credit report. The credit report must be no more than six months old at the time of the grant approval. This requirement provides the Agency with information that will assist in determining the applicant’s financial capacity. Not analyzing the information for negative credit indicators early in the process may result in an unnecessary waste of human resources, time and money for the Government and the general public in an attempt to liquidate the grant after it has closed.

The annual estimated burden: Man-hours: 18
Dollars: $359

- Evidence of need and demand for the MSH program

Applicants for technical assistance grants and predevelopment grants must provide documentation that there is a need and demand in their community for the program. Three components are required of the technical assistance applicant:

- Evidence of community support, which might be in the form of letters of support from elected officials, community institutions such as churches or housing authorities, or local residents.

- Evidence of need for the program that might be in the form of housing market studies, vacancy data, Census data, local planning data, Housing Authority waiting lists, or information from other such sources.

- Evidence of demand for the program, in the form of lists of income-eligible families who have expressed an interest in participating in the program. Applicants might develop such lists from attendance at MSH informational meetings, from waiting lists at other housing projects, or other similar sources.

For the predevelopment grant program, applicants must provide evidence that income-eligible families have expressed interest in participating in a self-help housing program. To demonstrate interest by such families, applicants must submit a list of the names and addresses of families who have expressed interest in the program.

The annual estimated burden: Man-hours: 2070
Dollars: $40,386

- Evidence of Land Availability

The technical assistance grantee’s ability to manage a successful program is significantly tied to its ability to acquire and/or develop suitable building sites. Without suitable building sites, the grantee has no chance of being successful even with eligible self-help applicants.

Therefore, it is essential that technical assistance and predevelopment grant applicants provide evidence of access to enough building sites to assure the Agency that house construction is feasible. The applicant should identify the site locations to show they are in the geographic area targeted by the applicant to reach eligible households.

The annual estimated burden: Man-hours: 920
Dollars: $17,949

- Monthly Activities Schedule

Technical assistance grant and predevelopment grant applicants must provide a monthly activities schedule. For technical assistance applicants, this schedule includes the proposed dates for starting and completing the preconstruction and construction phases for each group of participating families. For predevelopment grant applicants, this schedule includes activities needed to develop a technical assistance grant. The Agency uses this schedule to monitor the grantee’s progress throughout the grant period.

The annual estimated burden: Man-hours: 920
Dollars: $17,949

- Form AD-1047, “Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion”

This form is completed by technical assistance and predevelopment grant applicants to certify their eligibility to receive Federal funding in accordance with 7 CFR 3017, Section 3017.510.

The annual estimated burdens: Man-hours: 69
Dollars: $1,346

- Form AD-1049, “Certification Regarding Drug-Free Workplace Requirements”

This form is completed by technical assistance and predevelopment grant applicants to certify compliance with the drug-free workplace requirements of 7 CFR Part 3017, Subpart F, Section 3017.600.

The annual estimated burden: Man-hours: 69
Dollars: $1,346

- <u>Evidence of multi-funded status and cost-allocation plan</u>

Technical assistance grant applicants that operate more than one program and are multi-funded must submit a cost allocation plan that shows how indirect costs are allocated across the programs. In order to prove multi-funded status, applicants must provide letters of funding commitment from individuals, organizations, or governments.

Indirect costs are costs that benefit two or more programs but are not readily identifiable to those programs (e.g., office expenses). The applicant must provide either:

- ◆ An indirect cost rate that has been negotiated with the Department of the Interior or other cognizant Federal agency, or

- ◆ If the applicant has never obtained an indirect cost rate, a rate allocation plan with an estimate of indirect costs during the grant period. If the applicant does not submit a negotiated indirect cost with the application, the applicant must obtain a negotiated rate or waiver from the cognizant Federal agency prior to grant closing.

The annual estimated burdens: Man-hours: 1,400
Dollars: $27,314

- <u>Number of homes/Technical Assistance Cost</u>

Technical assistance grant applicants must provide a brief narrative that:

- ◆ Describes the objectives the grantee plans to accomplish during the grant period;

- ◆ Specifies the number of homes to be completed and if applicable, partially completed, during the grant; and

- ◆ Provides the proposed technical assistance cost per home for entire grant cycle.

This information is needed by the Agency in its decision-making capacity for determining reasonableness and adequacy of the proposal.

The annual estimated burden: Man-hours: 280
Dollars: $5,463

- Staffing Requirements

Prior to closing a technical assistance grant, applicants must submit a signed statement that they have identified and hired the four key staff members described under the organizational capacity requirement, or submit a signed contract demonstrating each individual's acceptance of employment, pending grant closing. Agency staff must not close a grant if the individuals have not been identified, as the hiring of staff members may significantly delay construction. Applicants must submit resumes for each of the four key staff members (if not previously provided).

The annual estimated burden: Man-hours: 117
Dollars: $2,283

- Grant Agreement

Technical assistance and predevelopment grant applicants must sign a grant agreement at the time of closing their grant and prior to drawing funds. The Agency prepares grant agreements; the paperwork burden for applicants entails reviewing and signing the agreement. The agreement contains the terms, conditions, and responsibilities of the grantee; it is the contract between the Federal Government and the grantee.

The annual estimated burden: Man-hours: 35
Dollars: $673

- Evidence of Bonding and Insurance

Prior to closing their grant, all applicants for technical assistance grants must submit proof of:

- ◆ Fidelity bonding;

- General liability insurance;
- Accounting and recordkeeping; and
- Worker's compensation insurance.

These requirements are necessary to ensure the integrity of program funds and protect grantees from the very real liabilities that are associated with operating a MSH program.

The annual estimated burden: Man-hours: 90
Dollars: $1,756

- <u>Intergovernmental Review</u>

Technical assistance grant applicants must provide documentation to the Agency that they are not subject to the Intergovernmental Review process required by 7 CFR part 3015. If an applicant is subject to the requirement, they must provide a copy of the completed review.

The annual estimated burden: Man-hours: 135
Dollars: $2,634

- <u>Statement of Compliance</u>

Prior to grant closing, the technical assistance grant applicant must furnish Rural Development with a signed statement that it will comply with the requirements of departmental regulations 7 CFR Part 3015, 3016 and 3019.

These signed statements obligate the grantee to meet the requirements associated with the conditions under which the grant is approved and provides the Agency with a legal basis for actions taken, when necessary.

The annual estimated burden: Man-hours: 117
Dollars: $2,283

- <u>Authorization from Board of Directors</u>

Prior to closing a technical assistance or predevelopment grant, applicants must submit a statement signed by their board of directors that explicitly describes the relationship between the board of directors and the executive director and authorizes the executive director to act on behalf of the organization for purposes of the grant.

The annual estimated burden: Man-hours: 228
Dollars: $4,448

- Establishing Interest Bearing Accounts

OMB requires recipients of Federal fund advances to establish interest bearing accounts. Technical assistance grantees are therefore required to comply with OMB Circular A-110, which details the requirements and procedures for establishing and maintaining this account.

The annual estimated burden: Man-hours: 90
Dollars: $1,756

- Agreement Between Grantees and Families (Member's Agreement)

A written agreement is required to help ensure good communication between the technical assistance grantee and the families. The agreement details what is expected of the families as they carry out their responsibilities under the grantee's supervision. The agreement benefits both parties and enhances settlement of disputes between the grantee and families and among families of the Self-Help group. This agreement helps remove the Agency from involvement in internal grantee management and provides the Agency with documentation to make objective decisions.

The annual estimated burden: Man-hours: 450
Dollars: $8,780

- Evidence First Group of Families Has Qualified for Financing

For each of the participating families in the first construction group, the technical assistance grant applicants must submit an "applicant eligibility letter" (AEL) prior to closing the grant. This letter will certify each participating family's qualification for financial assistance and the amount necessary to complete their home, as specified in the grant application. This information is used by the Agency staff to ensure that the participating family is approved to receive sufficient financial assistance to complete their home by comparing the amount on the AEL to that in the cost estimates submitted with the closing documents.

The annual estimated burden: Man-hours: 180
Dollars: $3,512

- Building Specifications

The technical assistance grant applicant must provide architectural plans, specifications and cost estimates of the houses to be built in order for the RHS staff to determine they meet the program requirements of RD Instruction 1924-A.

The annual estimated burden: Man-hours: 4500
Dollars: $87,795

- Evidence Applicant Has Addressed Findings in RHS Civil Rights Analysis

As part of its review of technical assistance grant applications, the Agency conducts a Civil Rights Analysis to verify compliance with the applicable Federal statutes. If the Agency’s analysis identifies problems, applicants must remedy these findings prior to closing a grant. This requirement applies only to grantees for which the Agency has made a Civil Rights finding.

The annual estimated burden: Man-hours: 1
Dollars: $20

- Request for Payment

The grantee will request payment for services in accordance with the proposed draw schedule, normally on a monthly basis. Occasionally, technical assistance grantees will vary from their planned draw schedule. Such variances may be minor and insignificant to the successful completion of program goals, or they may represent early warnings of larger problems with grantee performance. If a request is made that varies significantly from the schedule they provided to Agency, they must provide a brief written statement explaining the reasons for the discrepancy.

The annual estimated burden: Man-hours: 45
Dollars: $878

- Quarterly Reviews

Each quarter Rural Development will meet with the technical assistance grantees to review their progress in meeting performance goals as specified in the grantee’s Grant Agreement and to monitor compliance with program requirements.

The annual estimated burden: Man-hours: 2160

Dollars: $42,142

- Audit Report, Non-Profit Organizations

Audits are required to examine the systems of internal control, systems established to ensure compliance with laws and regulations affecting the expenditure of Federal funds, financial transactions and accounts, financial statements, and reports of recipient organizations.

Audits are required annually of the non-profit grantees per OMB Circulars A-110 and A-133. The audits verify whether grant funds were managed and expended in a lawful manner.

The annual estimated burden: Man-hours: 1620
Dollars: $31,606

- Audit Report, Local Governments, and Indian Tribes

Audits are required to examine the systems of internal control, systems established to ensure compliance with laws and regulations affecting the expenditure of Federal funds, financial transactions and accounts, financial statements, and reports of recipient organizations.

OMB Circular A-102, Attachment P and OMB Circular A-128 outline audit requirements for State, Local, and Tribal Governments that receive Federal assistance.

The annual estimated burden: Man-hours: 90
Dollars: $1,756

- Amendment to the Self-Help Technical Assistance Agreement

Technical assistance and predevelopment grantees may find it necessary to modify their grant agreements to reflect realistic goals. Usually, the amendment is executed when a determination is made by either the grantee or the Agency that the original goals cannot be met.

The annual estimated burden: Man-hours: 175
Dollars: $3,414

- Work-out Agreements

If a technical assistance grantee is designated as High Risk by the Agency due to poor performance, the grantee must develop a Work-out Agreement (WOA). The WOA is developed by the grantee, usually with a technical assistance contractor assigned by the Agency. The WOA includes three items:

- The problem(s) that need to be resolved;
- The proposed action(s) to resolve the problem(s); and
- The timeframe for each major segment of the action plan.

The annual estimated burden: Man-hours: 100
Dollars: $1,951

- Grant Close-out Records

At the conclusion of each grant cycle, technical assistance and predevelopment grantees must take action to provide final program and financial documentation. For the predevelopment grant applicant, this entails a final accounting of funds. For the technical assistance grant applicant, this requirement entails the following:

- Provide documentation of the extent to which the goals in the Grant Agreement were met;
- Providing a final inventory of all equipment purchases or equipment leased with grant funds;
- Providing a certification that the loan accounts of participating families have been closed; and
- Provide a Final Audit

The annual estimated burden: Man-hours: 1600
Dollars: $31,216

REPORTING REQUIREMENTS-FORMS APPROVED UNDER OTHER OMB NUMBERS

- Form SF-424, "Application for Federal Assistance"

This is a multi-purpose form that is used as the application form for the predevelopment and technical assistance grant program.

This form is also used by the Agency to report to clearinghouses actions taken on the applications in accordance with EO 12372 that eliminates the potential of duplication of effort. The estimated number of respondents is 234 annually requiring 45 minutes per response for a total of 176 man-hours. This item is approved under OMB Control Number 0348-0043.

- Form SF-424A, "Budget Information - Non-Construction Programs"

This form or a reasonable substitute (e.g., an identically formatted spreadsheet) must be completed by technical assistance and predevelopment applicants. This form allows applicants to provide detailed information on the budgets for which they are requesting funding.
The estimated number of respondents is 140 annually requiring 180 minutes per response for a total of 420 man-hours. This item is approved under OMB Control Number 0348-0044.

- Form RD 400-1, "Equal Opportunity Agreement"

Technical assistance grant recipients use this form when construction work is conducted under the provisions of "RD Instruction 1901-E." The estimated number of respondents is 140 annually requiring 10 minutes per response for a total of 22 man-hours. This item is approved under OMB Control Number 0575-0018.

- Form RD 400-4, "Assurance Agreement"

This form is used to confirm that applicants for grant assistance have been reminded of their obligations to comply with all the provisions of the Civil Rights Act of 1964 and regulations of the Agency. The estimated number of respondents is 140 annually requiring 15 minutes per response for a total of 35 man-hours. This item is approved under OMB Control Number 0575-0018.

- Form SF-424B, "Assurances – Non-Construction Programs"

Technical assistance grant applicants complete this form to certify their compliance with the applicable Federal requirements set forth in the form. These requirements include establishment of an accounting system in accordance with generally accepted accounting standards, agreements to comply with all Federal statutes relating to non-discrimination, safeguards to prohibit conflict of interest, and other similar requirements. The estimated number of respondents is 140 annually requiring 15 minutes per response for a total of 35 man-hours. This item is approved under OMB Control Number 0348-0040.

- Form RD 1940-Q Exhibit A, "Disclosure of Lobbying Activities"

Technical assistance and predevelopment grant applicants must disclose any lobbying activities they have engaged in to obtain Federal Assistance. The estimated number of respondents is 230 annually requiring 30 minutes per response for a total of 115 man-hours. This item is approved under OMB Control Number 0348-0046.

- <u>Form HUD-935.2, "Affirmative Fair Housing Marketing Plan"</u>

Prior to closing their grant and drawing funds, all technical assistance applicants with award status must submit an Affirmative Fair Housing Marketing Plan using *Form HUD 935.2* to describe the marketing of their program. This plan ensures that eligible persons and families are made aware of the MSH program. The estimated number of respondents is 90 annually requiring 3 hours per response for a total of 270 man-hours. This item is approved under OMB Control Number 2529-0013.

- <u>Form SF-270, "Request for Advance or Reimbursement"</u>

This form is used by technical grant recipients to comply with guidelines established for payment requirements by the Office of Management and Budget (OMB) Circulars A-110, "Grant and Agreements with Instructions of Higher Education, Hospitals, and other Non-Profit Organizations" and A-102, "Uniform Requirements for Assistance to State and Local Governments." The estimated number of respondents is 90 annually requiring 30 minutes per response for a total of 45 man-hours. This item is approved under OMB Control Number 0348-0006.

- <u>Form SF-269A, "Financial Status Report"</u>

At the time of grant closeout, technical assistance grantees must provide a financial status report using *SF-269A* that reflects all information–Federal and non-Federal–relating to obligations and expenditures of Agency grant funds. This is the final, summary report of all previous financial activity that occurred during the grant period. The estimated number of respondents is 45 annually requiring 90 minutes per response for a total of 68 man-hours. This item is approved under OMB Control Number 0348-0039.

3. <u>Describe whether, and to what extent, the collection of information involves the use of 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.</u>

Automated and electronic collection techniques can be utilized by technical assistance grantees to make their monthly request for draw-down of grant funds and to record their quarterly progress reports. Ninety percent of grantees currently report through SHARES. More automation can be expected with the electronic transfer of funds to grantees. Some forms can be completed by the grantees while still on line by accessing this site www.sc.egov.usda.gov, or other forms can only be viewed then downloaded to be completed later by accessing another web site www.usda.gov. USDA wide is working towards automated, electronic, mechanical or other technological collection techniques to reduce the burden on the public and to be in compliance with the Government Paperwork Elimination Act.

4. <u>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.</u>

The Agency has been informed by other Governmental departments and agencies and by the applicants that no similar program exists. Therefore, the Agency does not believe there is duplication of effort in the collection of information under this program and there is no known way of utilizing existing information.

5. <u>If the collection of information impacts small businesses or other small entities (item 5 of OMB Form 83-I), describe any methods to minimize burden.</u>

The information is to be collected only from private and public non-profit organizations. Therefore, there is no probability that small businesses will provide information as a result of this program.

6. <u>Describe the consequences to Federal program or policy activities if the collection is not conducted or conducted less frequently, as well as any technical or legal obstacles to reducing burden.</u>

The information collected under this program is considered the minimum necessary to conform to the requirements of program regulations that are established by law such as the requirement for intergovernmental consultation and the Affirmative Fair Housing Marketing Plans. The information collected is also considered to be the minimum necessary to ensure that the intent of the statute is achieved while maintaining consistency with OMB Circulars such as A-102, A-110, A-122. A-128, and A-133.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

a. Requiring respondents to report information more than quarterly. Technical assistance grantees are required to request the amount of grant funds they intend to draw-down on a monthly basis. The Agency has determined that monthly draw requests are necessary to ensure that grant funds are expended in a timely manner. If grantees were allowed to draw grant funds quarterly rather than monthly, large amounts of grant funds would go unused for periods of several months after draw. Further, grantees would tend to request draws for more funds than they would likely use, knowing that they would not be able to access funds again until the next quarterly draw.

b. Requiring written responses in less than 30 days. There are no specific information collection requirements that require less than 30 days response.

c. Requiring more than an original and two copies. There are no specific information collection requirements for more than an original and two copies.

d. Requiring respondents to retain records for more than 3 years. There are no such requirements.

e. Not utilizing statistical sampling. There are no such requirements.

f. Requiring use of statistical sampling which has not been reviewed and approved by OMB. There are no such requirements.

g. Requiring a pledge of confidentiality. There are no such requirements.

h. Requiring submission of proprietary secrets. There are no such requirements.

8. If applicable, identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection. Summarize public comments received and describe actions taken by the agency in response to these comments. 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 record keeping, disclosure, reporting format (if any), and on data elements to be recorded, disclosed, or reported.

A Federal Register Notice for the proposed collection was published with the proposed rule on May 18, 2007. The 60-day notice was imbedded inside the proposed rule.

The Agency involved several outside sources that are knowledgeable in Self-Help Housing Grants and the completion of application packages to ensure that burdens are reasonable, necessary, and kept to a minimum. The following organizations were consulted:

Ms. Judy Hunter, Program Analyst
Rural Community Assistance Corporation
3120 Freeboard Drive
Suite 201
West Sacramento, CA 95691
(916) 447-2854

Sherry DeZwarte, Project Director
National Council on Agricultural Life and Labor Research Fund, Inc.
363 Saulsbury Road
Dover, DE 19904
(302) 678-9400

Mr. Selvin McGahee, Executive Director
Florida Non-Profit Housing, Inc.
3909 Kenilworth Boulevard
Sebring, FL 33871
(863) 385-2519

Ms. Owyne Gardner, Senior Training Specialist
Little Dixie Community Action Agency, Inc.
209 North 4th Street
Hugo, OK 74743
(580) 326-3351

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

There is no payment or gift to respondents other than the reenumeration of contractors and grantees.

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

The information collected under the provisions of the proposed program is not considered to be of a confidential nature. The information is collected from organizations that ordinarily are required to make their activities available for public scrutiny.

11. Provide additional justification for any question of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private.

The information collected does not contain any matters of a sensitive nature such as sexual behavior and attitudes, religious beliefs, or other matters considered private.

12. Provide estimates of the hour burden of the collection of information.

Each organization surveyed was asked to estimate the amount of time required to complete reports, letters, and other requirements.

The number of respondents for burden determination was based on the following estimates. The number of total hours spent per applicant/grantee varies depending on the proposed project, the experience level of the organization, and other factors.

It is estimated that 18,698 man-hours will be the total burden on the public. The annual cost to the public for this collection of information is $364,796.

CUMULATIVE ESTIMATED BURDEN HOURS = 18,698
AVERAGE ESTIMATED COST PER HOUR = $19.51/hr
TOTAL ESTIMATED ANNUAL COST = $364,796

13. Provide an estimate of the total annual costs burden to respondents or record keepers resulting from the collection of information.

There is no start up costs involved in this information collection.

14. Provide estimates of the annualized cost to the Federal Government.

The Agency estimates the cost to the Federal Government to administer this program to be $1,349,564 per year, which includes the time to collect the information provided by the respondents, cost of printing the regulations, forms, and the Federal Register, and other administrative costs.

Program Management and Administration:

Salaries (National Office 1/FTE-GS13, ¼/FTE-GS14)	$106,884
Salaries (Field Staff 3/FTE-GS13, 9/FTE-GS12)	739,565
Salaries (Field staff, 8/FTE, GS11)	392,870
Training/TA	89,995
Publication costs	15,000
Supplies	5,250
Total	**$1,349,564**

15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of the OMB Form 83_I.

This is a new information collection that is being performed in conjunction with the publication of a proposed rule. The proposed regulation 7 CFR 3551 replaces the current rule 7 CFR 1944-I. The proposed rule clarifies certain requirements that, under the current rule, have multiple interpretations and amends others that have led to unintended consequences. The Mutual and Self-Help Program has doubled over the last three years. Therefore, the regulation will implement a competitive application process. As a result the Program Management and Administrative burden will increase over the last burden estimate.

16. For collection of information whose results will be published, outline plans for tabulation and publication.

The collection of information will not be published for statistical purposes.

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.

No forms cleared in this package.

18. Explain each exception to the certification statement in items 19 on OMB 83.1.

There are no exceptions requested.

19. <u>How is this information collection related to the Service Center Initiative (SCI)? Will this information collection be a part of the one stop shopping concept?</u>

This information collection is unlikely to be related to the services that can potentially be provided by the one stop shopping concept of the Service Center Initiative.