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.

1. Agency/Subagency Originating Request:
U.S. Department of Housing and Urban Development
Office of Housing – Office of Housing Assistance and Grant Administration

2. OMB Control Number:
a. 2502-new
b. None

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
- 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 2/15/2008
- 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)
180 Days

7. Title:
Demonstration Program for Elderly Housing for Intergenerational Families

8. Agency form number(s): (if applicable)
Standard grant forms: SF-424, SF-424 Supplemental, SF-LLL, HUD-2880, HUD-2991, HUD-92041, HUD-92042, HUD 2994-A, HUD-96010, HUD-27300, HUD-2990, Form HUD-96011 and Form HUD-92910

9. Keywords:
Intergenerational Dwelling Units, Intergenerational Families, Elderly Grandparents and other Relatives raising a child

10. Abstract:
The Demonstration Program for Elderly Housing for Intergenerational Families program provides assistance to expand the supply of intergenerational dwelling units to eligible private non-profit owners of Section 202 projects with the availability of supportive services for elderly grandparents and other relatives raising a child. The demonstration will provide capital advances to nonprofit organizations to expand the supply of affordable housing with the availability of supportive services for very low-income elderly persons. This funding will be used to develop the units. Additionally, Project Rental Assistance (PRAC) funds are available for eligible Section 202 projects that are funded under this program to cover the difference between the HUD-approved operating costs of the project and the tenants' contribution toward rent (30 percent of their adjusted monthly income) for intergenerational dwelling units provided under this demonstration. Converted units that already receive either section 8 or PRAC will not be eligible for PRAC assistance under this NOFA. The Demonstration Program application submission requirements are necessary to assist HUD in determining an applicant's eligibility and ability to develop and operate housing for intergenerational families.

11. Affected public: (mark primary with "P" and all others that apply with "X")
- a. Individuals or households
- b. Business or other for-profit
- c. **P** Not-for-profit institutions
- e. Farms
- f. Federal Government
- g. State, Local or Tribal Government

12. Obligation to respond: (mark primary with "P" and all others that apply with "X")
- a. Voluntary
- b. **P** Required to obtain or retain benefits
- c. Mandatory

13. Annual reporting and recordkeeping hour burden:

a. Number of respondents	11
b. Total annual responses	11
Percentage of these responses collected electronically	100%
c. Total annual hours requested	363
d. Current OMB inventory	0
e. Difference (+,-)	+363
f. Explanation of difference:	
1. Program change:	+363
2. Adjustment:	

14. Annual reporting and recordkeeping cost burden: (in thousands of dollars)
Do not include costs based on the hours in item 13.

a. Total annualized capital/startup costs	$0.00
b. Total annual costs (O&M)	$0.00
c. Total annualized cost requested	$0.00
d. Total annual cost requested	$0.00
e. Current OMB inventory	$0.00
f. Explanation of difference:	
1. Program change:	
2. Adjustment:	

15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X")
- a. **P** Application for benefits
- b. Program evaluation
- c. General purpose statistics
- d. Audit
- e. Program planning or management
- f. Research
- g. **X** Regulatory or compliance

16. Frequency of recordkeeping or reporting: (check all that apply)
- a. ☒ Recordkeeping
- b. ☐ Third party disclosure
- c. ☒ Reporting:
  - 1. ☐ On occasion
  - 2. ☐ Weekly
  - 3. ☐ Monthly
  - 4. ☐ Quarterly
  - 5. ☐ Semi-annually
  - 6. ☒ Annually
  - 7. ☐ Biennially
  - 8. ☐ Other (describe)

17. Statistical methods:

18. Agency contact: (person who can best answer questions regarding the content of this

Does this information collection employ statistical methods? ☐ Yes ☒ No	submission) Name: Claire Trivedi Phone: 202-402-6634 or Name: Aretha Williams Phone: 202-708-3000 ext. 2480

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) appears 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;
   (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
(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.

Signature of Program Official:	Date:
X Michael E. Winiarski, Deputy Director, Organizational Policy, Planning and Analysis Division	

Signature of Senior Officer or Designee:	Date:
X Lillian Deitzer, Paperwork Reduction Act Compliance Officer, AYO	

Supporting Statement for Paperwork Reduction Act Submissions

Application Submission Requirements -
Demonstration Program for Elderly Housing for Intergenerational Families
OMB Control Number 2502-new

A. Justification

The Demonstration Program for Elderly Housing for Intergenerational Families was created by the Living Equitably: Grandparents Aiding Children and Youth Act of 2003 or the "Legacy Act of 2003" (Pub. L. 108-186, title II, Dec. 16, 2003, 117 Stat. 2688). The Department of Housing and Urban Development Appropriations Act, 2006 (Pub. L.109-115, approved Nov. 30, 2005) provides $4 million for a Demonstration Program for Elderly Intergenerational Families pursuant to section 203 of Public Law 108-186. The Demonstration Program was created to provide assistance for intergenerational dwelling units for intergenerational families in connection with the supportive housing program under section 202 of the Housing Act of 1959 (12 U.S.C. 1701q). The assistance shall be provided only to private nonprofit owners of Section 202 projects for use only for expanding the supply of intergenerational dwelling units. Not less than 2 and not more than 4 projects that are assisted under section 202 of the Housing Act of 1959 (12 U.S.C. 1701q) shall be selected for assistance based on the ability of the applicant to develop and operate intergenerational dwelling units and national geographical diversity among the projects funded.

Capital Advance funds are available for eligible Section 202 projects funded under this demonstration program so that owners can appropriately renovate or build a minimum of 5 units for intergenerational use. Units must be retrofitted or built with specific features that are compatible with both elderly tenants and children. These changes include converting the studios or one-bedroom units that are common in housing for the elderly or building more units specifically for intergenerational housing. These things may be done in the following ways: (1) by designating and retrofitting existing dwelling units that are located within a project assisted under Section 202 of the Housing Act of 1959; (2) through the development of buildings or projects comprised solely of intergenerational dwelling units; or (3) through the development of an annex or addition to an existing project assisted under Section 202 of the Housing Act of 1959 that contains intergenerational dwelling units, including through the development of elder cottage housing opportunity units, that are small, freestanding, barrier free, energy efficient, removable dwelling units located adjacent to a larger project or dwelling. Projects approved under this demonstration program will include a range of services that are tailored to meet the needs of elderly persons, children, and intergenerational families.

Project Rental Assistance Contract (PRAC) funds are available for eligible Section 202 projects funded under this program to cover the difference between the HUD-approved operating costs of the project and the tenants' contribution toward rent (30 percent of their adjusted monthly income) for intergenerational dwelling units provided under this demonstration. Converted units that already receive either section 8 or PRAC will not be eligible for PRAC assistance under the NOFA. A portion of the PRAC funds (not to exceed $15 per unit/per month) may be used to cover some of the cost of supportive services for residents. The balance of the cost for services must be paid for from sources other than the demonstration program funds or PRAC funds. The cost of employing a service coordinator for the project is also an eligible use of the PRAC funds. Section 202 projects receiving Congregate Housing Services assistance under Section 802 of the National Affordable Housing Act are not eligible to use demonstration program funds or PRAC funds for supportive services or the cost of a service coordinator.

In order to ensure that only those applicants that satisfy the eligibility criteria are selected, it is important to obtain information from prospective applicants to assist HUD in determining if the applicant has the administrative capacity and the ability to develop and operate intergenerational housing to carry out this funding opportunity. Additionally, if the information were not collected, HUD would have no method for reviewing/granting this award on a competitive and equitable basis as required by Federal regulations.

B. Contents of Application Package:

The contents of the Application Package for a Demonstration Program Fund Reservation include four parts and eight exhibits. The eighth exhibit includes 12 prescribed forms, some of which are categorized as certifications and resolutions. The four components of the application submission are:

Part 1 - Application Form for the Demonstration Program for Elderly Housing for Intergenerational Families;
Part 2 – Project Owner's Ability to Develop and Operate the Proposed Project;
Part 3 - The Need for Intergenerational Housing for the Target Population in the Area to Be Served, Site Control and Suitability of Site, and Adequacy of the Provision of Supportive Services and of the Proposed Project; and
Part 4 - General Application Requirements, Certifications, and Resolutions.

The Demonstration Program application submission requirements are necessary to assist HUD in determining an applicant's eligibility and ability to develop and operate housing for intergenerational families consistent with prescribed statutory and program criteria and the Legacy Act of 2003. A thorough evaluation of an applicant's qualifications and capabilities is critical in protecting the Federal Government's financial interest and to mitigate any possibility of fraud, waste, or mismanagement of public funds.

Applications must be received and validated by grants.gov no later than 11:59:59 P.M. Eastern Time on the application deadline date. HUD Headquarters will evaluate applications based on established criteria identified in the Notice of Funding Availability (NOFA), rate the applications, and make selections. Applicants will be notified of selection or non-selection by HUD Headquarters. This is the first time this process will be used for this program as it is a new funding opportunity for a new demonstration program.

The purpose and use of the four components of the Demonstration Program application exhibits are briefly described below:

Part 1 - Application for The Demonstration Program for Elderly Housing for Intergenerational Families

Exhibit 1: This exhibit requires applicants to submit Form HUD-92910 Application for Demonstration Program for Elderly Housing for Intergenerational Families. The form identifies the applicant and its known development team members and collects basic information with regard to the proposed project's characteristics. HUD staff will use this exhibit to obtain basic information regarding the proposed project. *The information collected from the applicant respective to item 2 of this form is needed for the Department's Minority Business Enterprise goals.*

Part 2 – Project Owner's Ability to Develop and Operate the Proposed Project

Exhibit 2: This exhibit requires evidence of the project owner's legal status. Applicants who have received a Section 202 fund reservation within the last three funding cycles are not required to submit their organizational documents and IRS tax exemption rulings unless there has been a change since they were last selected. Instead, these applicants must submit only the project numbers of their latest application and the modifications, if any.

Exhibit 3: It is important to note that many applicants will experience some relief of paperwork burden in preparing this exhibit because applicants have participated in prior funding competitions

and will be able to use information and exhibits from previously prepared applications. Some previously prepared examples include information regarding providing services to minorities and community involvement. The submissions about previous experience in and current capacity for the provision of housing and services are distinct because the target population is not only elderly, but also children.

This exhibit requests several narrative descriptions from the applicant. The applicant must provide a description of their purpose, current activities, their ability to enlist volunteers, raise private and local funds, and how long they have been in existence. The applicant is also required to submit a description of their community support, ties to the community at large, including minority and elderly communities and to the community of intergenerational families in particular. The applicant must describe their experience serving the target populations of people fewer than 18 and 62 and over, including minorities. The applicant must detail its efforts to involve the elderly and youth in developing the application and their intent to involve them in the operation of the project.

The applicant must include a comprehensive sources and uses statement identifying all funds for development and supportive services for the proposed project including a description of other funding sources for the project (financial assistance, donation of land, provision of services, etc.), financial commitment letters with specific dollar amounts and letters of support from agencies, organizations, businesses and/or any other groups that will partner with them to provide services.

A description of the applicant's relevant experience with intergenerational families and their housing and supportive service needs, a description of the practical solutions that will be implemented that will enhance the quality of life for the residents and a description of how the proposed project will remain viable as housing with the availability of supportive services for the target population for the term of the mortgage must be provided. The applicant must describe their plan for completing the project including providing a development timeline for the project. The applicant must provide evidence that the proposed project will be completed timely and of their past performance.

(c) Part 3 - The Need for Supportive Housing for the Target Population in the Area to Be Served, Site Control and Suitability of Site, Adequacy of the Provision of Supportive Services and of the Proposed Project;

Exhibit 4: The applicant is to include a description of the proposed population and evidence demonstrating sustained effective demand for housing for the proposed population in the market area to be served, taking into consideration the occupancy and vacancy conditions in existing comparable subsidized housing for intergenerational families (e.g. other HUD-assisted housing such as public housing and housing financed by Rural Housing Service under the Department of Agriculture). Also, the applicant must provide a description of how information in the community's or where applicable, the State's Consolidated Plan, Analysis of Impediment to Fair Housing Choice or other planning documents that analyze fair housing issues were used in documenting the need for the project.

This exhibit also requires the applicant to: (1) describe the project, including the building design and whether or not the design will promote energy efficiency; (2) describe how the project will benefit the target population and the community in which it will be located; (3) provide information about the proposed project with evidence of site control (including a Phase I Environmental Site Assessment), along with whether the site is properly zoned; and (4) provide a copy of the letter sent to the State/Tribal Historic Preservation Officer (SHPO/THPO) that discusses the historical significance of the proposed project – a copy of the SHPO/THPO response letter must also be provided. Lastly, the applicant must include a map showing the location of the site, the racial composition of the neighborhood, and any areas of racial concentration.

Information relative to the need for the housing, proposed residents, supportive services and project characteristics (including site control) is necessary to determine whether: (1) there is a market need and demand for the housing in the area to be served by the proposed project; (2) the applicant is proposing to serve an eligible population; (3) the design will result in an economical and energy efficient building and will accommodate the special needs of the elderly and children; (4) the proposed site is acceptable from an environmental and location standpoint for the intended residents; (5) the applicant has legal control of the site, if selected; and (6) the site is permissively zoned for the intended use. Information with respect to the promotion of an energy efficient building design will be used to assist HUD in determining compliance with the energy efficiency standards in accordance with Section 109 of NAHA.

Exhibit 5: The applicant must submit a supportive services plan that includes: (a) a description of the supportive services that will be provided to the project residents; (b) a description of anticipated public or private sources of assistance to fund the supportive services; and (c) the manner in which the services will be provided to the residents.

This exhibit also requires the applicant to provide a detailed description of the supportive services needs of the intended residents and a list of community service providers with evidence of each provider's capability and experience. For those applicants that will be making any supportive services available to the residents, a letter providing a description of the supportive services that will be made available to the residents, assurance that any supportive services will be based on the resident's need, and a commitment to make supportive services available, must be provided, including whether or not a service coordinator will be provided.

This exhibit requires applicants to provide a staffing plan, tenant selection policies and procedures, residence requirements and written rules and procedures. Because of the intended residents that will occupy the housing, specific rules, policies and procedures need to be in place to handle potentially threatening situations. The applicant should identify the staff that will be employed by the project, including security personnel, whether parents will be allowed to live on the property, and whether the elderly grandparent or relative must have legal custody of the child. The applicant must clearly state these criteria in the application.

Last, applicants must provide a statement indicating that they will not condition occupancy on the resident's acceptance of any supportive services.

This information is evaluated to determine the adequacy of the provision of supportive services, how such services will be funded and how the supportive services will meet the identified needs of the residents and accommodate the aging of the residents, including children, over the years. This is important because the LEGACY Act of 2003 requires HUD to ensure that supportive services are provided which are tailored to the needs of the types of residents occupying the housing. HUD funds through Project Rental Assistance Contracts may be used to cover a small portion (not to exceed $15 per unit per month) of the cost for such services and the cost of a service coordinator. The balance of the service cost, however, must be provided from other sources.

(d) Part 4 - General Application Requirements, Certifications and Resolutions

Exhibit 6: The Demonstration Program applicants must submit a statement identifying all persons occupying the property by race/minority group, and status as owners or tenants on the date of submission of the application for funding. Information is also submitted estimating the cost of any relocation payments and other services, identifying the staff organization that will carry out the relocation activities, and identifying all persons who have moved from the site within the past 12 months. The information is consistent with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended.
Exhibit 7: This exhibit consists of certifications and resolutions to be completed by the Demonstration Program applicant, which includes optional forms and forms that were already submitted with the Section

202 application and may not be necessary unless there are updates or if they participated in the last 3 funding cycles:

8(a) Information requested on Form SF-424, Application for Federal Assistance, serves several purposes. This form is used for the applicant to provide a funding matrix listing each program for which HUD funding is being requested. Pursuant to Executive Order (EO) 12372, the applicant submits this form to the State, where it is used by the State, to initiate the intergovernmental review process and the applicant certifies to the same on the form. The applicant also uses the form to certify that it is not delinquent on any Federal debt and that it is in compliance with the requirements regarding payments to influence Federal transactions, which are OMB requirements.

8(b) SF-424-Supplement, Survey on Ensuring Equal Opportunity for Applicants. This form is for applicants that are private nonprofit organizations. Its purpose is to assist the Federal government in ensuring that all qualified applicants, small or large, non-religious, or faith-based, have an equal opportunity to compete for Federal funding.

8(c) Standard Form LLL, Disclosure of Lobbying Activities (OMB No. 0348-0046) discloses lobbying activities pursuant to 31 U.S.C. 1352.

8(d) Form HUD-2880, Applicant/Recipient Disclosure/Update Report, includes the Social Security and Employee Identification Numbers (OMB No. 2510-0011), is required by Section 102 of the HUD Reform Act of 1989. The applicant uses this form to disclose any other Government assistance, which may be provided in connection with the proposed project. This information assists HUD by ensuring that the applicant does not receive more assistance than is necessary to develop and operate the proposed project.

8(e) Certification of Consistency with the Consolidated Plan (Form HUD-2991) is a certification that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan. A certifying official of the jurisdiction, where the project is located, must sign the plan.

8(f) Sponsor's Conflict of Interest Resolution (Form HUD-92041) is a certified Board Resolution that no officer or director of the Sponsor or Owner has or will have any financial interest in any contract with the Owner or in any firm or corporation that has or will have a contract with the Owner, including a current listing of all duly qualified and sitting officers and directors by title and the beginning and ending dates of each person’s term. The Owner should complete and sign this form for this demonstration although the word Sponsor is used in the title.

8(g) Sponsors Resolution for Commitment to Project (Form HUD-92042) is a certified resolution from the applicant’s Board acknowledging its responsibilities of sponsorship and long-term support of the project, its willingness to assist the Owner to develop, own, manage and provide appropriate services in connection with the proposed project, and that it reflect the will of the membership. Also, it shall indicate its willingness to provide the funds to get the project to initial closing including estimated start-up expenses and the cost of any amenities or features that cannot be covered by the funding. The Sponsor should complete and sign this form.

8(h) Form HUD-2994-A, You Are Our Client Survey, This is an optional form that may be used to provide suggestions and comments to the Department regarding the applicant’s application submission experience.

8(i) Form HUD-96010, Logic Model. Requiring this form supports HUD’s effort of ensuring that programs result in achievement of HUD’ strategic mission.

8(j) Form HUD-27300, Questionnaire for HUD’s Initiative on Removal of Regulatory Barriers (optional form). The applicant will receive points if the form is submitted and a reference, URL or a brief statement documenting the successful efforts in removing barriers to affordable housing by the jurisdiction in which the project is located is provided.

8(k) Certification of Consistency with RC/EZ/EC Strategic Plan (Form HUD-2990), if applicable. If the proposed project will be located in a Federally–designated Empowerment Zone (EZ), Enterprise Community (EC), an Urban Enhanced or Renewal Community, Strategic Planning Community, or Renewal Community, this is a certification by an authorized official that the project is located in one of these areas and that the proposed activities/projects in the application are consistent with the Strategic Plan of the area.

8(l) Form HUD-96011, Facsimile Transmittal to be used for faxing third party letters and other documents for the applicant’s electronic applications.

3. Applicants must submit their applications electronically through Grants.gov. Applicants required submitting third party documentation can choose to either scan the documents to create electronic files or submit the required documentation to HUD by facsimile. Applicants may only use the fax method using the required HUD 96011, Transmittal Form, to submit attachments that are part of their electronic application. All grant applications must be received and validated electronically by Grants.gov no later than the established application submission deadline. Under special circumstances such as preventing a hardship on a small agency, a waiver of the electronic submission may be approved. Applicants seeking a waiver of the electronic submission requirement must request a waiver in accordance with 24 CFR 5.1005. Applicants that are granted a waiver of the electronic submission requirement will not be afforded additional time to submit their applications.

4. No duplication exists in the collection. The information is available from no other source.

5. This information collection will not have a significant economic impact on small entities.

6. In the absence of the above information, the Department would not be able to assess the worthiness of applications, determine whether the projects and services meet statutory and regulatory requirements, or make sound judgments regarding the potential risk to the Government.

7. If a waiver is approved for the applicant to submit a paper application, HUD requires applicants to submit an original and four copies of the Demonstration Program Application be submitted to ensure expeditious processing. Seven HUD technical disciplines are involved in the review and assessment of applications: the Offices of Valuation, Architectural and Engineering, Housing Program/Project Manager, Fair Housing and Equal Opportunity, Economic and Market Analysis, Community Planning and Development, and the General Counsel. HUD requires concurrent reviews of the applications in order to meet schedules to obligate funds by the established deadline date.

8. In accordance with 5 CFR 1320.8(d), the agency’s notice soliciting public comments was announced in the Federal Register on ___tba____________ , Volume , Number , Pages .

   The Department will consider comments received from respondents of HUD-Form 2994, You Are Our Client Survey, as well as comments and recommendations received from Headquarters based on their experience with the program. The Department is continuously looking for ways to streamline the application process to better serve our clients.

   In addition, HUD continues to meet with Section 202 nonprofit sponsors/owners, housing consultants, industry groups, intergenerational families, and other interested HUD program staff. The Department consulted with various housing professionals representing the types of groups that are familiar with intergenerational housing (non-profit organizations, developers, service providers) and will continue to consult with these groups throughout this funding cycle. Following is a list of some of the housing professionals (Housing Consultants and Intergenerational Housing Sponsors) that HUD consulted with by telephone, meetings, and/or workshop sessions:

Brent Elrod Generations United 1331 H Street, NW Suite 900 Washington, DC 20005 (202) 289-3979	Dave Taylor Presbyterian Senior Services 2095 Broadway Suite 409 New York, NY 10023 (212) 874-6633	Ana Beltran Generations United 1331 H Street, NW Suite 900 Washington, DC 20005 (425) 614-1940	Laura Jervis West Side Federation for Senior & Supportive Housing 2345 Broadway New York, NY 10024 (212) 721-6032

9. HUD does not provide any payment or gift to respondents, other than the award of funds and project rental assistance funds for those applicants selected for funding.

10. HUD does not ensure confidentiality. The applicant is informed of their privacy rights. Documentation and other information regarding each application submitted, including any letters of support, will be made available for public inspection for a 5-year period in accordance with the Freedom of information Act (5 U.S.C. 552), and HUD's implementing regulations in 24 CFR Part 15. Also, since HUD 2880 requires a Social Security number from the applicant, the form addresses the Privacy Act.

11. The application submission requirements do not contain any sensitive questions.

12. Burden Estimate: This is a new collection. See the table on the next page for a breakdown of the respondents' burden hours.
    Although all private non-profit owners of Section 202 projects are eligible to apply for the funding, four factors will limit applications. First, there is a small funding amount of only $4 million. The average cost of an intergenerational development, depending on location, is more expensive because both child and older adult services must be provided along with more than one bedroom for the families. Second, many senior housing communities would prefer to keep the population for elderly only, based on experiences with other combined 202 developments. Next, the communities served by the 202 properties do not always have the intergenerational demographic group in their population in order to take advantage of the program. Last, although the intergenerational method is used and it is a growing trend, it is not yet a widespread idea. Many potential respondents may be resistant at this time to pay application costs for such a small piece of the funding for a program that is not yet well known. It is estimated that the total number of respondents may be more than 10 but it is not likely based on the above factors. Therefore 11 is the estimated number of respondents. Each response will take 41.56 hours, with a total of 451.21 for all respondents combined.

Description of Information Collection (Application Submission Requirements) Estimated Numbers of Respondents	Est. Number of Respondents	Responses per Year	Total Annual Responses	Hrs per Response	Total Hours
Part 1: Exhibit 1, Application for Demonstration Program for Elderly Housing for Intergenerational Families Form HUD-92910	11	1	11	.5	5.5
Part 2: Exhibit 2, Legal Status of project owner's records if owner has not participated in last 3 funding cycles	11	1	11	1	0
Exhibit 3, Sponsor's purpose, community ties, and experience if there are modifications or updates	11	1	11	6.0	66
Part 3: Exhibit 4, Project information and site	11	1	11	21.5	236.5
Exhibit 5, Supportive Services Plan specifically for children and elderly	11	1	11	2.0	22
Part 4: Exhibit 6, A statement that identifies occupants and relocation costs	5*	1	5	4.0	20
Exhibit 7, Funding Application, Certifications and Resolutions 8(a) SF-424 - Application for Federal Assistance OMB Approval 4040-0004	11	1	11	.75	8.25
8(b) SF-424-Supplemental, Survey on Ensuring Equal Opportunity for Applicants OMB Approval 1890-0014	11	1	11	.3	3.3
8(c) SF LLL - Disclosure of Lobbying Activities OMB Approval 0348-0046	10	1	10	.1667	1.667
8(d) HUD-2880 - Applicant/Recipient Disclosure/ Update Report (2510-0011), OMB Approval 2510-0011	11	1	11	0	0
8(e) HUD-2991 - Cert of Consistency with the Consolidated Plan	11	1	11	0	0
8(f) HUD-92041 - Sponsor's Conflict of Interest Resolution OMB Approval 2502-0267 (completed by owner)	11	1	11	.4	0
8(g) HUD-92042 - Sponsor's Resolution for Commitment to Project, OMB Approval 2502-0267 (completed by sponsor)	11	1	11	.4	0
8(h) Form HUD-2994 – You Are Our Client Survey OMB Approval 2535-0116	11	1	11	0	0
8(i) HUD-96010-I – Logic Model (2535-0114)	11	1	11	0	0
8(j) Form HUD 27300 – Questionnaire for HUD's Initiative on Removal of Regulatory Barriers (Optional Form), OMB Approval 2510-0013	11	1	11	0	0
8(k) HUD-2990 - Certification of Consistency with the RC/EZ/EC Strategic Plan	1**	1	1	0	0
8(l) Form HUD-96011, Facsimile Transmittal, OMB Approval 2535-0118	11	1	11	0	0
Total		1	11	33.019	363.217
The number of respondents is an estimate based on estimated response for the amount of funds available and the type of housing to be developed					

* No more than five percent of proposals will involve relocation.

**Not more than 10 percent of proposals will be for sites located in an RC/EZ/EC area.

In estimating the cost to the applicants, it should be noted that in order to comply with the program requirements, the applicant might retain an attorney. The applicant must have control of a site and they must conduct a Phase I Environmental Site Assessment. In addition, as many private nonprofit organizations do not have in-house expertise or staff to develop an application, the applicant usually hires a housing consultant. The applicant is a private nonprofit owner of a Section 202 project and as such provides its services at no cost. In view of this, the following illustrates the estimated cost to the respondents:

Housing Consultant ($70 per hour)	$2,100
Applicant (Project Owner)	Pro bono
Attorney	1,575
Site Option Cost	$ 500
Phase I Environmental Site Assessment	3,750
Total Cost Per Respondent	$7,925
Total number of responses	x 10
Total Estimated Annual Cost	**$79,250**

It should be noted that many professionals work on a retainer basis and if the applicant does not obtain HUD approval, they do not collect a fee. The figures presented above are based on HUD's experience, as well as consultation with housing professionals in the field.

13. There are no additional costs to respondents. HUD recognizes that some applicants who are sincerely interested in providing housing may lack the staff and other resources to develop such a project. Therefore, in recognition of the need for these applicants to use the service of professional housing consultants, HUD permits a reasonable fee for consultant's services to be included in the Demonstration Program funds. The consultant may assist the applicant in preparing the Application Package to request Demonstration Program funds and throughout the final development of the project, should the applicant be selected for funding.

14. The majority of the work involved in reviewing the applications is performed at HUD Headquarters. The significant costs attributable to the promulgation of the application requirements will be the cost involved in reviewing the information submitted by the applicants. Program procedures require the following reviews performed by the various Headquarters staff. The cost to the Federal Government is based on an average salary at the GS-13/5 level, except for the General Counsel and the Program Assistant, which is at the GS-14/5 and GS- 7/5 levels, respectively. Also included is the cost associated with the preparation and printing of the HUD NOFA for use by the applicants in assembling their individual Application.

HUD Staff Reviews	**Total Hours per Application**	**Hourly Rate**	**Total**
Headquarters Division Director	0.5	$60	$ 30
Designated Design Architect	1	$43	$43
Valuation	3	$43	$129
Economic and Market Analysis	1	$43	$43
Staff from FHEO	1	$43	$43
Housing Program/Project Manager	4	$43	$172
Staff from CPD	1	$43	$43
Headquarters Attorney	3	$51	$153
Clerical Assistant	0.5	$21	$11
Total Staff Time per Application	15		$667
Total Annual Number of Responses			x 10
Total Annual Staff Time Cost to Government			**$6,670**
Other Cost for All Applications			
Printing, Postage for NOFA/Other Related Documents (200 copies)			$250
Mailing Services			* $2,450
Total Other Cost			**$2,700**
Total Estimated Annual Cost to Government			**$9,370**

15. This is a new request.

16. Collection of this information will not be published. Each application will be maintained with HUD Headquarters in individual project files. However, a list of awardees will be made public, usually by *Federal Register* publication, upon completion of the selection process.

17. HUD is not seeking approval to avoid displaying the OMB expiration date.

18. There are no exceptions to the certification statement identified in Item 19 of the OMB 83-I.

B. Collections of Information Employing Statistical Methods

There are no plans to use statistical methods for collecting this information. Collection for this information occurs once for each application submitted.