
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;
 - (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:

X

Date:

Signature of Senior Officer or Designee:

X
Lillian Deitzer, Departmental Reports Management Officer,
Office of the Chief Information Officer

Date:

Supporting Statement for Paperwork Reduction Act Submissions

Consolidated Submission for CPD Programs Attachment to OMB 83-I Consolidated Plan

Justification

Under a previous submission, OMB Control Number 2506-0117, the burden of meeting the regulatory requirements of Title I of the National Affordable Housing Act (NAHA) and the Housing and Community Development Act (HCDA) were assessed. That submission was approved until March 31, 2008. The President's Management Agenda had directed HUD to work with local stakeholders to streamline the consolidated plan, making it more results-oriented and useful to communities in assessing their own progress toward addressing the problems of low-income areas. The Department carefully considered ideas generated by several working groups that were established to explore alternative planning requirements and suggestions for improving the consolidated planning process. The previous submission that was approved resulted from an extensive consultation process that involved stakeholders representing the interests of state and local governments and low-income persons.

1. Legal and administrative requirements

Based on 24 CFR Parts 91 et. al. each jurisdiction receiving formula allocated funds under the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) program, the Emergency Shelter Grants (ESG), or Housing Opportunities for Persons with HIV/AIDS (HOPWA) program, must submit a Consolidated Plan establishing an overall three- to five- year strategy for the use of these funds and a one year action plan detailing specific objectives and individual projects. The information collection includes narrative requirements such as statements of goals, objectives, and priorities for funds, and tabular information describing priority needs and goals. Information is also collected regarding programmatic accomplishments and annual performance of states and localities receiving formula allocated funds under these programs in accordance with statutory and regulatory requirements found in Title I of the HCDA of 1974, NAHA of 1992, and in 24 CFR Part 91.520.

2. Purpose and Use of the Information

The information is collected from all localities and states participating in any one of these four formula grant programs for review by the Department in order to determine each jurisdiction's compliance with statutory and regulatory requirements as referred to above, to provide a framework for local accountability, and to provide supporting information for program review and audit. States and local governments use the plan and report to describe progress in meeting program goals and objectives and to assist them with their own program evaluations. The Department uses the plans and reports to monitor grant execution, to evaluate the eligibility of the population being served, for ongoing program evaluation, and to identify progress in meeting statutory goals.

3. Use of Improved Information Technology to Reduce Burden

The Department made computer software available to all states and localities to maximize the efficiency of submitting Consolidated Plan information electronically. Approximately 90 percent of all jurisdictions submitting plans took advantage of this option in FY 2005. Increased acceptance of this option will further reduce paperwork burden and improve the effectiveness of communication between program participants and the Department.

4. Attempts to Identify Duplication

The original submission detailed the elimination of duplicate program reporting and the consolidation of these requirements into one planning document and one consolidated performance report. These improvements remain in force and are unaffected by any statutory or regulatory changes that have occurred in the interim. State and local jurisdictions participating in the programs submit only annual plan updates that detail how annual program allocations will be spent. This information is necessarily new each year and cannot be re-used or modified. The underlying three- to five -year plans remain in force for most grantees and will not be updated until the year 2010.

5. Small Business Involvement Not Applicable. Information collection does not impact small businesses or other small entities.

6. Consequence of Less Frequent Information Collection

Title I of the NAHA of 1992 and the NCDA of 1974, as amended preclude a less frequent information collection. The information collected is the minimum necessary to implement the statute and achieve its stated purposes and objectives.

7. Special Circumstances Not Applicable. No other special circumstances apply.

8. Consultation with Stakeholders

The notice was posted in the Federal Register on November 19, 2007, page 65055, and no comments were received. The previous paperwork approval resulted from an extensive consultation process that considered ideas generated by several working groups that were established to explore alternative planning requirements and suggestions for improving the consolidated plan. During July and August 2005, HUD's Office of Community Planning and Development conducted regional feedback sessions in San Francisco, Philadelphia, Detroit, Atlanta, and Austin to solicit comments on the new performance measurement system that was published in the Federal Register on June 10, 2005. In 2006, HUD's Office of Community Planning and Development also conducted fifteen regional training workshops that discussed how jurisdictions could integrate the new performance measurement system into consolidated plans and annual performance reports.

9. Payment to Respondents Not Applicable. No payments or gifts to respondents are allowed.

10. Confidentiality Assurance Not Applicable. The plan and report do not request any information is of a confidential nature.

11. Area of Sensitivity Not Applicable. This information does not include any questions of a sensitive nature.

12. Estimated Burden Hours for Consolidated Plan

Considerable public comment and interaction with national and local interest groups went into the submission requirements of the Consolidated Plan. HUD's estimate of burden hours provided below was approved by OMB on March 4, 2005 under control number 2506-0117.

Task	Number of Respondents	Frequency of Response	Total U.S. Burden Hrs
Consolidated Plan			
<i>Localities</i>			
• Strategic Plan Development	1,000	1	220,000
• Action Plan Development	1,000	1	112,000
<i>States</i>			
• Strategic Plan Development	50	1	30,200
• Action Plan Development	50	1	18,700
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Performance Report			
Localities	1,000	1	162,000
States	50	1	12,600
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*Abbreviated Strategy	100		8,200
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TOTAL	1,150		563,700

*Abbreviated strategy is a abbreviated plan submitted by a local jurisdiction that does not receive direct CDBG or HOME funding. An abbreviated strategy must contain sufficient information about the needs, resources, and planned activities to address the type and amount of assistance anticipated to be funded by HUD. (See 24 CFR 91.235)

A complete consolidated plan that contains a strategic plan and annual action plan is submitted once every five years. An annual action plan and performance report is submitted once a year. The total number of respondents is 1,150. These include 1,000 local governments and 50 states that receive direct CDBG or HOME funding and are required to submit a complete consolidated plan, annual action plan, and annual performance report. Approximately 100 jurisdictions that do not receive direct CDBG or HOME funding submit an abbreviated strategy that is appropriate to the type and amount of assistance sought from HUD. The total number of burden hours is 563,700. The following are estimates of annual costs to respondents for the preparation of a complete consolidated plan, annual action plan, and annual performance report:

Consolidated Plan Respondent Cost Per Site

Localities

5 Year Strategic Plan (\$26 per hr. x 220 hrs.) = \$5,720

Annual Action Plan (\$26 per hr. x 112 hrs.) = \$2,912

States

5 Year Strategic Plan (\$26 per hr. x 604 hrs.) = \$15,704

Annual Action Plan (\$26 per hr. x 374 hrs.) = \$9,724

Annual Performance Report Cost Per Site

Localities (\$26 per hr. x 162 hrs.) = \$ 4,212

States (\$26 per hr. x 252) = \$6,552

13. Estimated Respondent Costs of Total Burden Hours

There is no additional cost to respondents or record keepers for collection of this information for the elements: (a) total capital and start-up costs; and (b) total operation and maintenance and purchase of services.

14. Estimated Annualized Cost to the Federal Government

Item	#Responses	Hours/ Response	Cost/ Hour*	Total Cost
Consolidated Plan and Performance Report	2,200	15	\$34	\$748,000

Estimate assumes a blended hourly rate that is equivalent to a GS-12, Step 5, Federal Government employee.

15. Changes in Burden

No change in burden hours from previously approved submission.

16. Publication of Collected Information

Not Applicable. There are no plans to publish the results of this collection of information for statistical use.

17. Collection of Information Whose Results Will Be Published

Not Applicable. There are no plans to seek approval to not display the expiration date for OMB approval of the information collection.

18. Exceptions to Certification Statement

Not Applicable. No exceptions.