
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
Mark A. Horwath, Director, Technical Assistance Division, Office of Technical Assistance and Management

Signature of Senior Officer or Designee:

X
Wayne Eddins, Departmental Reports Management Officer,
Office of the Chief Information Officer

Date:

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification

1. This information collection provides for an application for grants to fund technical assistance for five Community Planning and Development (CPD) program areas: HOME, Community Housing Development Organization (CHDO), McKinney-Vento Homeless Assistance, Community Development Block Grant (CDBG), and HOPWA. The information is necessary to determine competition winners and to monitor expenditures of grant funds. Sufficient information is required for the Department to base a judgment as to the technical capability of the prospective providers in providing technical assistance to CPD grantees.

Quarterly reports are required to: 1) monitor the eligibility of their activities, 2) evaluate their performance, and 3) measure performance in achieving program objectives. HOME TA activities undertaken by the awardee must be in compliance with 24CFR Part 92.400 of the HOME regulations. CHDO TA activities undertaken must be in compliance with 24CFR Part 92.302 of the HOME regulations. CDBG TA activities undertaken by the awardee must be in compliance with 24CFR Part 570.402 of the CDBG regulations. McKinney-Vento Homeless Assistance TA activities undertaken by the awardee must be in compliance with 24CFR Part 583.140 of the Supportive Housing Program TA regulations.

Regulations covering HUD's requirements to monitor non-profit providers' program and financial performance are found in 24 CFR Part 84, Sections 84.51 and 84.52. State and local government technical assistance providers are covered by 24 CFR Part 85, Sections 85.40 and 85.41.

2. The information is used to determine the most qualified technical assistance providers best able to offer local jurisdictions the ability to shape their CPD resources and other available resources into effective, coordinated, neighborhood and community development strategies to revitalize and physically, socially and economically strengthen their communities. Since that time, the information collected from these providers has been used to evaluate their performance and their progress in achieving their objectives. It has also been used to support payment requests from the providers.

The providers develop workplans with headquarters and individual field offices for each program area in which they are providing services. As a result of the FY 2006 competition, approximately 179 workplans are in place, which require quarterly reports and monthly recordkeeping.

3. In accordance with the requirements stated in the SuperNOFA, applicants have been able to submit their applications electronically through Grants.gov since 2004. In addition, HUD accepts electronic transmission of quarterly reports from our grantees.
4. This information collection does not duplicate any existing collection. No similar information is available.
5. This information collection does not have a significant economic impact on a substantial number of small entities.
6. If the application information was not collected, the Department would not be available to evaluate the potential providers' ability to efficiently and effectively provide technical assistance to CPD grantees. If post-award information is not collected, the Department would not be able to evaluate the providers' activities to determine the adequacy of their efforts and justify payments.
7. While no reports are required to be submitted on less than a quarterly basis, it is possible that an awardee would choose to be reimbursed for expenses on a more frequent basis than quarterly. If so, then recordkeeping (to support a payment request) would occur more frequently, most likely on a monthly basis. It is also estimated that even if payment reimbursement requests are made on a quarterly basis, recordkeeping on a monthly basis would be necessary to keep current with expenditures.
8. On November 28, 2007, a Notice of Proposed Information collection for Public Comment was published. No comments were received.
9. There are no decisions to provide any payment or gift to respondents. .
10. There are no assurances of confidentiality provided to the respondents.

11. There are no questions asked of respondents that are of a sensitive nature.

12. Estimated Burden. Based on past experience, we estimate 286 applications. There are a total of 179 ongoing grants. Approximately 40 grants will be closed out during the period.

Description of Information Collection (Application Submission Requirements)	No. of Respondents	Annual Responses	Total Annual Responses	Hrs per Response	Total Hours
SF-424 – Application for Federal Assistance	286	1	286	.75	214.5
HUD 424-CB – Grant Application Detailed Budget	286	1	286	3	858
HUD-424-CBW – Detailed Budget Worksheet for Non-Construction Projects	286	1	286	3	858
SF-424 Supplement, Survey on Equal Opportunity for Applicants	286	1	286	0.2	57.2
SF LLL- Disclosure of Lobbying Activities (if engaged in Lobbying)	286	1	286	0.3	85.8
HUD-2994-A You Are Our Client! Grant Applicant Survey (2535-0116)	286	1	286	0	0
HUD-2880 – Applicant/Recipient Disclosure/Update Report (2510-0011)	286	1	286	0	0
Application narratives/including cover page	286	1	286	42.0	12,012
Residual grantees plus new awardees					
Workplan	179	1	179	2	358
Quarterly Reports and SF-269A HUD-96010-1 – Logic Model (2535-0114)	179	4	716	6.75	4,833
Final Report	40	1	40	1.5	60
Recordkeeping	179	12	2,148	0.50	1,074
TOTAL			3,369	60	20,410.5

Estimated hourly costs of \$37 X 20,410.5 hrs. will total \$ 755,188.50 annually.

13. No additional costs to the respondents.

14. Estimated cost to the Government:

	No. of staff	No. of Hours per staff	Annual Frequency	Total Annual Hrs	Cost per Hr	Total Annual Cost
Application retrieval and Dissemination	4	40	1	160	\$51	\$8,160
Application Review	140	30	1	4200	\$36	\$151,200
Quarterly Report Review	50	4	4	800	\$30	\$24,000
Recordkeeping	50	1	12	600	\$30	\$18,000
TOTAL						\$201,360

15. Data included in this submission is based on the Department’s experience as a result of FY 2006 grant applications. The burden has been recomputed and does not include the burden of those collections with a separate OMB approval. No program or information collection changes have been made.

16. The information submitted is not published. Notice of the competition winners are published in the *Federal Register* approximately six months after receipt of applications.

17. There are no reasons to not display the expiration date for OMB approval of the information collection.

18. There are no exceptions to certification statement.

B. Collections of Information Employing Statistical Methods

N/A