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## 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:  Darlene F. Williams, Secretary for Policy Development and Research	Date:
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Signature of Senior Officer or Designee:  X Lillian Deitzer, Departmental Reports Management Officer, Office of the Chief Information Officer	Date:
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# Supporting Statement for Paperwork Reduction Act Submissions

## A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Department of Housing and Urban Development (HUD) is directed by Title III of the 1998 Amendments to the Higher Education Act of 1965 (Pub.L.105-244, approved October 7, 1998) to make available approximately \$ 3 million to assist Tribal Colleges and Universities (TCU). The purpose of this program is to assist TCU to build, expand, renovate, and equip their own facilities, and to expand the role of the TCUs into the community through the provision of needed services such as health programs, job training, and economic development activities.

Grantees are selected through a competition process, announced through a Notice of Funding Availability. Applicants are required to submit certain information as part of their application for assistance. Grantees are required to prepare semi-annual status report so that HUD monitors the progress of grantees in completing their research.

2. 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.

The information is collected during the application process. Collection of this data will serve two purposes:

- a) It will enable HUD to select grantee under a competitive selection process. Without this information, it would be impossible to determine which applicants to select.
- b) It will enable the Government Technical Representative (GTR) to monitor each grantee's performance. It is the only way to determine that funds are being spent in accordance with the goals of the program.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, 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. Also describe any consideration of using information technology to reduce burden.

Applicants submit their applications packages through Grants.gov an electronic submission process. Progress reports may also be submitted via the computer.

4. 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.

This program does not duplicate any existing government program. No similar information is available.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I) describe any methods used to minimize burden.

The TCUP program does not involve small businesses.

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

If information were not collected pursuant to submitting applications, HUD would have no qualitative for selecting among the various applicants. If information were not collected for monitoring purposes, HUD would not be able to ensure that Federal dollars were being spent wisely and appropriately.

Information collected pursuant to submitting applications is requested only once per application cycle, the minimum amount of time possible. Information collected for monitoring purposes is submitted semi-annually during the three year grant performance period. To require less frequent submission would mean that no action could be taken to correct administrative problems before the end of the grant period.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
- requiring respondents to report information to the agency more than quarterly;
  - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
  - requiring respondents to submit more than an original and two copies of any document;
  - requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
  - in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;
  - requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
  - that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
  - requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

None

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.
- 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 recordkeeping disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported.
  - Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.

Notice was published in the Federal Register on November 21, 2007. No comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than reenumeration of contractors or grantees.
- No payments or gifts will be made to respondents.
10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy.
- No assurance of confidentiality is provided to respondents.
11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.
- No questions of a sensitive nature are asked.
12. Provide estimates of the hour burden of the collection of information. The statement should:
- indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally estimates should not include burden hours for customary and usual business practices;
  - if this request covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I; and
  - provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

#### 1) Pre-Award

HUD estimates that each applicant spends approximately 40 person-hours to complete an application. Almost all of this time is invested by the coordinator or other senior administrator who would oversee the program. HUD estimates the mean hourly rate at \$30. For 24 applications, the computation is as follows: 24 applications X 40 hours \$30 X per hours= \$28,800.

2) Post-Award

HUD estimates that each grantee will spend approximately 5 hours a year maintaining records. HUD also estimates that each grantee will spend approximately 10 hours a year preparing monitoring reports and 15 hours during each funding cycle's final grant year preparing final reports. Clerical staff and faculty/supervisory staff will share this burden. HUD estimates the applicable hourly rate at \$15. The computation is as follow: 15 grantees x 25 hours x \$15 an hour = \$5,625.

Description of Information Collection	Number of Respondents	Responses per Year	Total Annual Responses	Hrs per Response	Total Hours
SF424	24	1	24	0.75	18
SF424 Supplement	24	1	24	0.08	1.92
HUD 424CB	24	1	24	3	72
SFLLL	24	1	24	0.17	4.08
HUD 27300 (2510-0013)	24	1	24	0	0
HUD 2880 (2510-0011)	24	1	24	0	0
HUD 2990	24	1	24	0	0
HUD 2993	24	1	24	0	0
HUD 2994 A	24	1	24	0	0
HUD 96010 (2535-0114)	24	1	24	0	0
HUD 96011	24	1	24	0	0
Rating factor 1	24	1	24	9	216
Rating factor 2	24	1	24	9	216
Rating factor 3	24	1	24	9	216
Rating factor 4	24	1	24	9	216
Subtotal (Application)	24	1	24	40	960
Quarterly Reports	15	4	60	10	600
Final Reports	5	1	5	15	75
Record keeping	15			5	75
<b>Total</b>	<b>24</b>	<b>varies</b>	<b>89</b>	<b>Varies</b>	<b>1710</b>

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information (do not include the cost of any hour burden shown in Items 12 and 14).
- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;
  - If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
  - generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There is no additional cost to respondents.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

1) Pre-Award. Twenty-four applications are expected to be reviewed annually. Each application takes three hours to review and is reviewed by three persons, having an average grade of GS-13 and an hourly rate of \$35. Thus the annual review process takes approximately 180 staff hours. The computation is as follows: 24 applications x 3 persons x 3 hours X \$35 = \$7,560

2) Post-Award. HUD will award approximately 5 grants pursuant to each annual Notice of Funding Availability. With annual reporting, HUD would receive progress reports for each grant cycle, requiring a total review time of 3 hours per grant per report.

15. Explain the reasons for any program changes or adjustments reported in Items 13 and 14 of the OMB Form 83-I.

This is an extension of a currently approved collection. The adjustment to Item 13 of the OMB 83-I reports a more accurate accounting of the burden hours for this information collection

16. For collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Results will not be published

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 such approval is sought.

18. Explain each exception to the certification statement identified in item 19.

None requested.

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**B. Collections of Information Employing Statistical Methods**

None.