

Supporting Statement for Public Collection of Information for the HOME Investment Partnerships Program Competitive Reallocation of Funds

A. Justification

1. Circumstances that make the collection of information necessary.

Public Law 101-625 (104 Stat. 4079), Title II of the Cranston-Gonzalez National Affordable Housing Act, as amended (Attachment 1) established the HOME Program. Under the HOME Program, HUD allocates funds by formula among eligible units of State and local governments to strengthen public-private partnerships for the production of affordable housing for low-income families. Participating jurisdictions (PJs) use HOME funds directly to carry out housing activities and provide funds to other eligible entities, such as Community Housing Development Organizations (CHDOs) and other nonprofit and for-profit developers.

The HOME statute at Section 231(a) and HOME regulation (Attachment 2) at 24 CFR 92.300(a) require PJs to reserve (set-aside) not less than 15 percent of each HOME allocation for investment only in housing to be developed, sponsored, or owned by CHDOs, within 24 months after HUD notifies the PJ of its executed HOME Investment Partnerships Agreement. Set-aside funds not reserved after a period of 24 months are deobligated from the PJ's line of credit and made available for reallocation to other PJs.

The HOME statute at Section 217(c) and HOME regulation at 24 CFR 92.452 require HUD to competitively reallocate any CHDO funds reduced or recaptured from a participating jurisdiction. HUD will reallocate these funds by competition to other participating jurisdictions for affordable housing developed, sponsored, or owned by CHDOs. Section 92.453 of HOME regulations states that HUD will invite applications through the Federal Register of a Notice of Funding Availability (NOFA), in accordance with section 102 of the Department of Housing and Urban Development Reform Act of 1989 (42 U.S.C. 3545) and the requirements of section 217(c) of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12747(c)). The NOFA includes three selection criteria: *Commitment*, *Actions*, and *Policies*, used to judge applications submitted for competitive reallocations as well as a threshold criterion. Selection criteria *Commitments* and *Actions* are pre-scored based on information provided from the Integrated Disbursement and Information System (IDIS). Selection criteria *Policies* are based on a checklist and narrative provided by the applicant describing how the PJ is pursuing policies that result in the creation of energy-efficient and environmentally-friendly (green) housing that is affordable to low-income families, using design and technology models that can be replicated. This criterion also examines the degree to which the applicant is pursuing policies that remedy the effects of discrimination and improve housing opportunities for disadvantaged minorities. Participating jurisdictions selected to receive reallocated HOME funds will be required to collect the same data they do for their appropriated HOME funds.

This is the second competitive reallocation authorized under the HOME statute; the first being the 2004 competitive reallocation for HOME CHDO housing projects designed to serve the chronically homeless.

2. How the information is used.

All applicants are state and local HOME participating jurisdictions. Information will be provided by the applicants in writing. The information submitted by the applicant will be used to award the applicant points in order to score and rank applications and make awards under the NOFA.

3. Improved technology.

A selection criterion is based on a narrative provided by the applicant describing how the PJ is pursuing policies that result in the creation of energy-efficient and environmentally-friendly (green) housing that is affordable to low-income families, using design and technology models that can be replicated. This criterion also examines the degree to which the applicant is pursuing policies that remedy the effects of discrimination and improve housing opportunities for disadvantaged minorities. Since this NOFA will not be repeated any consideration of using information technology would not reduce the burden. Therefore, applications will not be submitted through grants.gov. However, since the inception of the HOME Program, the collection of information (collection of data on funds management, project and tenant characteristics, and owner data) has been automated through the Cash Management and Information System (CMI) and its successor system, Integrated Disbursement Information System (IDIS). IDIS eliminated the need for participating jurisdictions to submit paper reports. All reporting is through the regular HOME program.

All data elements of the IDIS systems are required under Title II or related authorities.

4. Efforts to identify duplication.

The data provided by IDIS to score applications for selection criteria *Commitment and Actions* is already available within the system. HUD Headquarters staff has direct access to this data. The narrative provided in selection criteria *Policies* is not provided in any other data forum.

5. Burden to small business or small entities.

None.

6. Consequences if information is collected less frequently.

The information required for this competitive reallocation will be only collected once.

7. Special circumstances.

The information provided through IDIS or from the applicant will only be collected once.

8. Public notice.

The notice of proposed information collection will be published in the Federal Register.

9. Payment or gifts.

None.

10. Assurance of confidentiality.

Recipients of the assistance will collect and maintain records of information. Information on activities and expenditures of grant funds is public information and is generally available for disclosure. No assurance of confidentiality, statute, regulation, or agency policy is provided.

11. Questions of a sensitive nature.

None.

12a. Annual reporting and recordkeeping burden.

Reg Section	Paperwork Requirement	Burden Hours	Number of Jurisdictions	Total Hours
§ 92.453	Criteria for Competitive Reallocations	40	65	2,600
Grand Total				2,600

Annualized Cost to Respondents 40 x 65 x \$30= \$78,000

It is estimated that it would take a total of forty hours to complete the narrative, HUD 424, HUD-2880, and HUD-2993.

13. Estimate of total costs to respondents.

There are no other costs to the respondents (other than the cost shown in item 12 above).

14. Estimate of annualized cost to the federal government.

The cost to the government to review the applications is estimated at \$3,000.

§ 92.452	Reallocation of Community Housing Development Organization Set-aside Headquarters Cost:	2 hours X 65 applications =	130 hours
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Total cost to the Federal Government: 130 hours at \$40/ hour = **\$5,200**

15. Explanation of program changes/adjustments.

This is a new collection. It is a one-time competition to reallocate CHDO funds. Approximately 65 out of the 645 existing participating jurisdictions are expected to apply for the competition. Successful applicants will add funds awarded from the competition to their existing CHDO set-aside to undertake housing activities in accordance with HOME Program requirements.

Paperwork burden hours are related to the preparation of applications for submission to HUD. No new forms will be created or used.

16. Publications of results.

Results will not be published.

17. Display of the expiration date for OMB approval of the information collection.

The Office of Affordable Housing Programs is not seeking to not display the expiration date for OMB approval of the information collection.

18. Explanation of each exception on the certification statement.

No exceptions are made to the certification statement identified in item 19, “Certification for Paperwork Reduction Act Submissions” of OMB Form 83-I.

B. This collection does not employ statistical methods.