



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

OFFICE OF THE ASSISTANT SECRETARY FOR
COMMUNITY PLANNING AND DEVELOPMENT

JUL 06 2010

Mr. Ross Rutledge
OMB Desk Officer
Office of Management and Budget
New Executive Office Building
Washington, DC 20503

Dear Mr. Rutledge:

The Department is seeking emergency review and approval of the Paperwork Reduction Act requirements contained in the Community Planning and Development Technical Assistance Grant Applications (OneCPD and SNAPS TA). The Notice of Paperwork Submission (copy enclosed), proposed for immediate Federal Register publication, explains the burden of the collection requirements and invites public comments on them.


The OneCPD and SNAPS TA programs are supported by the information collection for the Application for Community Planning and Development (CPD) Technical Assistance Program under OMB control number 2506-0166. Implementation of the two new forms, Experience Matrix and Expertise Matrix, included in this revised information collection will significantly reduce the burden of applicants by reducing 15 pages of experience and capacity narrative to two or three pages.

This emergency processing is requested due to the implementation of the new Transformation Initiative (TI) at HUD. HUD did not have authorization to implement the TI until passage of the FY 2010 appropriations legislation. Additionally, Congress had to approve the operating plan for the TI before CPD could re-engineer the TA application process. Under the TI, technical assistance for four CPD programs is consolidated under the OneCPD application. Additional streamlining has been achieved through the alignment of OneCPD and SNAPS TA. Under this consolidation and alignment, each applicant will complete one Experience Matrix and one Expertise Matrix whether they apply for one or both TA programs.

In compliance with the requirements of 5 CFR 1320.13, this letter requests emergency processing within seven calendar days from the date of the Federal Register publication of the Notice of Submission of Proposed Information Collection to OMB. This emergency processing is essential in order to provide the necessary technical assistance to communities and projects serving America's most vulnerable populations.

Thank you for your consideration and assistance.

Sincerely,



Jeanne Van Vlandren
General Deputy Assistant Secretary (Acting)

Enclosures

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 be 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  7-2-10
Holly Kelly, Acting Director, Technical Assistance Division, Office of Technical Assistance and Management

Signature of Senior Officer or Designee:

x 

Date:

7/2/10

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 HUD 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 communities nationwide. 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 for each program area in which they are providing services. As a result of the FY 2008 competition, approximately 179 workplans are in place, which require quarterly reports and monthly recordkeeping.

3. In accordance with the requirements stated in the NOFA, 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 able 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. A Notice of Proposed Information collection for Public Comment was published.
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	100	1	100	.50	50
HUD 424-CB – Grant Application Detailed Budget	100	1	100	3	300
HUD-424-CBW – Detailed Budget Worksheet for Non-Construction Projects	100	1	100	3	300
SF LLL- Disclosure of Lobbying Activities (if engaged in Lobbying)	100	1	100	0.3	30
HUD-2880 – Applicant/Recipient Disclosure/Update Report (2510-0011)	100	1	100	.50	50
HUD 40040 – Technical Assistance Expertise Matrix	100	1	100	4	400
HUD 40044 – Technical Assistance Experience Matrix	100	1	100	8	800
NOFA Narratives	100	1	100	48	4,800
Workplan	24	1	24	16	384
Quarterly Reports and SF-269A HUD-96010-1 – Logic Model (2535-0114)	24	4	96	6.75	648
Final Report	24	1	24	1.5	36
Recordkeeping	24	12	288	0.50	144
TOTAL			1,232	92.05	7,942

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	30	1	120	\$51	\$6,120
Application Review	30	32	1	960	\$36	34,960
Quarterly Report Review	20	4	4	320	\$30	\$9,600
Recordkeeping	20	8	12	1,920	\$30	\$57,600
TOTAL						\$108,280

15. Data included in this submission is based on the Department's experience as a result of FY 2007 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