

SUPPORTING STATEMENT for PAPERWORK REDUCTION ACT SUBMISSIONS
Fair Housing Initiatives Program (FHIP) Grant Application and Testing Training

PART A - JUSTIFICATION

A1. Circumstances Making Information Collection Necessary

The Fair Housing Initiatives Program Division in HUD Headquarters will use the information provided in FHIP grant applications to objectively evaluate applicants on how well they meet the selection factors set out in the NOFA. It also serves to monitor selected applicants or grantees to assess compliance and effectiveness.

The Fair Housing Act-Title VIII of the Civil Rights Act of 1968, as amended, 42 U.S.C. 3601-19, charges the Secretary of Housing and Urban Development with responsibility to accept and investigate complaints alleging discrimination based on race, color, religion, sex, handicap, familial status, or national origin in the sale, rental, or financing of most housing, and in other real estate-related transactions. The Act also requires the Secretary to coordinate with State and local agencies administering fair housing laws, and to cooperate with and render technical assistance to public or private entities carrying out programs to prevent and eliminate discriminatory housing practices.

Section 561 of the Housing and Community Development Act of 1987 (1987 Act), 42 U.S.C. 3616, as amended, established the Fair Housing Initiatives Program (FHIP) to strengthen the Department's enforcement of the Fair Housing Act and to further fair housing. The law, as amended, authorized funding for the Administrative Enforcement, Education and Outreach, Private Enforcement and Fair Housing Organizations Initiatives to eligible applicants. Eligible applicants include: State and local governments or their agencies, public and private non-profit organizations, faith-based organizations, or other public and private entities that are carrying out programs to prevent or eliminate discriminatory housing practices. Eligible organizations will conduct investigations of violations of the rights guaranteed by the Act and to carry out a range of enforcement and investigative activities to remedy violations, as appropriate; to build or to continue to build the capacity of current organizations in fair housing and/or to establish, organize and build the capacity of new fair housing enforcement organizations, particularly in those areas of the country which are currently underserved by fair housing enforcement organizations as well as those areas where large concentrations of protected classes exist; and, to provide education and outreach programs at the national, regional, local and community-based areas, to instruct the general public regarding their rights and responsibilities provided under the Act.

The Department is also required by the Act to prepare and submit to Congress, a comprehensive, report on a fiscal year basis, of the progress made in accomplishing program objectives to prevent and eliminate discriminatory housing, mortgage lending and other practices in the Nation covered by the Act. Additional reporting areas include a summary of all private enforcement initiative activities carried out, all programs funded as well as a summary of the use of funds under all program initiatives and any findings, conclusions, or recommendations as a result of the funded activities.

A2. How and By Whom the Data will be Used

The information is to assess the qualifications of applicants for funding under the Fair Housing Initiatives Program (FHIP) to train Qualified Fair Housing Enforcement Organization and Fair Housing Enforcement Organizations on testing procedures and updates in testing and testing methodologies as further determined under the appropriate notice of funding availability.

Eligible applicants will submit electronic applications (unless waived in accordance with established NOFA procedures) to the Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, Office of Programs, Fair Housing Initiatives Program Division in accordance with the requirements described in the Notice of Funds Availability. Application information is available from www.grants.gov. The NOFA will discuss the requirements and weighted factors for selection and solicit individual applications in accordance with funding availability. Funding continues to be awarded on a competitive basis.

Modifications to existing application submission and or reporting requirements include: N/A

A3. The Extent of the Collection of Information Involving the Use of Automated, Electronic, or Other Forms of Information Technology

As indicated above, electronic forms were implemented for the 2005 fiscal year under the E-Grants initiatives and will be continued, and improved, in the future. www.grants.gov.

A4. Efforts to Identify Duplication

There is no duplication of information. The Department must train grantees on appropriate testing procedures.

A5. Efforts to Minimize the Burden on Small Entities

The collection of information involves tax-exempt non-profit Qualified Fair Housing Enforcement Organizations (QFHOs) and Fair Housing Enforcement Organizations (FHOs). Typically, private non-profit fair housing organizations are small entities. Therefore, we have attempted to minimize the burden by limiting the information requested necessary for evaluating and certifying that FHIP funds will not be used to settle a claim, satisfy a judgment, or fulfill a court order in any defensive litigation.

A6. Consequences of Less Frequent Data Collection

Without benefit of the information requested and certified from applicants, the Department would have no means for distinguishing proposals with a high probability for success in training participants on the most effective methods for carrying out projects, activities and tasks to increase compliance with the Fair Housing Act and with substantially equivalent State and local fair housing laws from those which may prove to be troublesome. In addition, the Department could not ensure a fair competition for funding or certify that FHIP funds are used in accordance with statutes and regulation.

Without record-keeping, progress and financial reports, the Department would have no means to measure how successful individual organizations are in carrying out their projects and managing FHIP funds, and the performance of the program overall in delivering services to enforce fair housing law and provide education and outreach on fair housing rights and responsibilities.

A7. Circumstances Requiring Deviation from Guidelines of 5 CFR 1320.6

Applicants must submit their grant proposals to the Department via the Federal Government's electronic portal. Electronic submissions are protected but are accessible to each reader on the Technical Evaluation Panels (TEPs). TEPs are responsible for evaluating proposals under the various initiatives.

A8. Confidentiality all applications received as a result of the competitive solicitation. Only designated employees, who have signed a confidentiality statement, are permitted to handle or see applications. Only the Assistant Secretary for FHEO and the Congressional Relations Office are permitted to release the results of competitive solicitations.

A9. Federal Register Publication

This information is collected in a manner consistent with guidelines of 5 CFR 1320.8(d).

A10. Incentive Payments and Gifts

This information collection does not involve any payment or gift to respondents.

A11. Arrangements and Assurances Regarding Confidentiality

Applicants are advised in the Notice of Funding Availability that their proposals are subject to disclosure under the provisions of the Freedom of Information Act (FOIA), and as such may be released in whole or in part, depending on the Department's determination of what information must be released. Applicants are permitted to indicate which portions of an application they believe should not be released and the basis for that belief, but the Department retains the right to make an independent evaluation as to releasing the requested information.

A12. Sensitive Questions

This information collection does not contain requests for information of a sensitive nature.

A13. Estimate of Record-keeping and Reporting Hour Burden on Respondents

The Department estimates that application development, logic model, quarterly reports, and/ or final report, are anticipated to have the following reporting burdens:

Application	Number of Respondents	Frequency of Response	Hours/Response	Burden Hours
Development	50	1	86.50	4,325
Quarterly Report	4	4	19	304
Final Report	4	1	20	80
Record-keeping	4	1	21	84

The number of respondents is an estimate based upon the average of the number of applicants able to undertake this type of training. The number of hours is an average based on grantee estimates of time to review instructions, search existing data sources, prepare required responses to the application, complete the certification, and assemble exhibits.

TOTAL BURDEN HOURS: 4,793

Annualized Cost to Respondents for Hour Burdens for Information Collections

Estimates for Logic Models, quarterly reports, record-keeping and final reports are based on approximately fifty (50) applications. The 1 grantee is required to report 4 times annually (or quarterly reports) on program performance and financial status.

The Quarterly Reports are required of the grantee applicant. The Quarterly Reports provide the Department with grid reporting and narrative reporting of the status of program tasks and deliverables. The report process assists HUD in evaluating performance and providing early intervention if needed. The Final Report is a compilation of activities for the prescribed grant period and is required within 90 days of the close of grant activities. It provides HUD with a summary that includes objectives, accomplishments, and results.

Hours per response are averages based on grantee estimates of time to review instructions, search existing data sources, gather and maintain the data needed, and complete or respond to and review the collection of information. Actual time will vary because of proposed activity, size, or complexity.

Total costs were calculated (rounded to the nearest dollar): **Total Burden Hours (4,793) x Professional Hourly Rate (\$62.06) = \$297,454.**

A14. Estimate of Recordkeeping and Reporting Cost Burden on Respondents

This information collection does not result in an additional cost burden to respondents.

A15. Estimated Cost to the Federal Government

There will not be any additional cost to the Federal Government as a result of this information collection beyond the usual personnel costs to review and select applications, award funding, and monitor performance of grantees.

A16. Reasons for Change in Burden N/A

A17. Plans for Tabulation, Analysis, and Publication

The Department may publish e-logic model information as part of its mandatory Annual Report to Congress.

A18. Reasons for Not Displaying the OMB Expiration Date

There is not a request seeking approval to not display the expiration date for OMB approval of the information collection.

A19. Exceptions

There are no exceptions to the certification statement.

PART B - EMPLOYMENT OF STATISTICAL METHODS

This information collection does not employ statistical methods.