

## Supporting Statement for Paperwork Reduction Act Submissions

### Family Unification Program – 2577-0259

#### A. Justification

1. The Department of Housing and Urban Development Appropriations Act, 2010 (Public Law 111-117, enacted on December 16, 2009) authorizes the HUD Secretary to use up to \$15,000,000 to competitively fund new vouchers to be used to promote the unification of families for whom the lack of adequate housing is a primary factor in the imminent placement of a family's child, or children, in out-of-home care; or the delay in the discharge of the child, or children, to the family from out-of-home care. Youths at least 18 years old and not more than 21 years old (have not reached their 22nd birthday) who left foster care at age 16 or older and who do not have adequate housing are also eligible to receive housing assistance under FUP. HUD will publish a separate Notice of Funding Availability (NOFA) that will contain the selection criteria for awarding FUP vouchers and specific requirements that will apply to selected applicants.

The Family Unification Program will employ a comprehensive approach to assisting at-risk families centered on providing adequate housing and supportive services in partnership between Public Housing Agencies (PHAs) and Public Child Welfare Agencies (PCWAs). The program aims to unify families for whom the lack of adequate housing threatens to place children in out-of-home care by providing Housing Choice Vouchers to allow families to obtain adequate housing in the neighborhoods of their choice.

2. Eligible applicants interested in obtaining FUP funds will be required to submit applications to HUD, as explained in the 2010 NOFA. The information collection covers the information needed from applicants to determine which applicants should be funded and program reporting and recordkeeping requirements. The information provided demonstrates the applicants' plans to implement the program requirements, and includes related applicant history. The application will include such information as an MOU between the PHA and PCWA, narrative statements related to the program rating criteria, and other statements ensuring that the applicants meet HUD requirements. The information will be used by HUD staff to evaluate threshold requirements, rate and rank FUP voucher applications, and measure performance.

3. **Technology applied to the collection:** This information collection is automated in order to improve data quality and to reduce the public reporting burden. Since FY 2005, the Department has required applications prepared in response to NOFAs to be submitted electronically via Grants.gov.

#### 4. Duplication of Effort:

There is no duplication of effort. Information collected is unique to each type of collection and does not duplicate any similar information or method.

#### 5. Impact on Small Business and Small Entities:

These information collections have no impact on small businesses or other entities.

#### 6. Consequence of Less Frequent Collection:

The Federal statutory mandate would not be met if the collection is not conducted. The information collection is necessary so that the available 2010 funds, per the Appropriations Act, may be awarded timely to successful applicants for the FUP program.

#### 7. Special Circumstances for Information Collection:

There are no special circumstances that would cause these information collections to be conducted inappropriately.

#### 8. Federal Register Notice and Public Comments:

The notice of HUD's request for OMB to review this collection under emergency processing procedures was published on September 21, 2010, Volume 75, Page 57491, granting a 7-day public comment period ending September 28, 2010. No comments were received.

**9. Payment/Gifts to Respondents:**

No payments or gifts are provided to respondents for any of these information collections.

**10. Assurances of Confidentiality:**

Assurance of confidentiality is neither provided nor needed for any of these information collections.

**11. Questions of a Sensitive Nature:**

No sensitive questions are being asked for any of these information collections.

**12. Estimate of Annual Burden Hours for Information Collection:** The chart below outlines the burden hours associated with the various aspects of the Family Unification Program NOFA and also includes the post-award submission of the Logic Model approved under another OMB approval to capture information associated with implementation of Area Wide Housing Opportunities sub-categories associated with HUD policy priorities.

Costs to the respondents to complete these information collections for the application process are indicated below.

Burden hours per application response are estimated at 17.77 hours and per post-award reporting and recordkeeping at 10.5 hours. Burden hours are estimated for 265 applicant respondents submitting NOFA applications and 42 applicants receiving funding and maintaining records and reporting on program implementation for a total burden of 6035.7. Forms such as the SF 424 are not duplicative information. These forms, while authorized under different OMB Control Numbers, are submitted as part of the FUP application process and used specific to the applications' content.

Description of Information Collection	Number of Respondents	Responses per Year	Total Annual Responses	Hrs per Response	Total Burden Hours
SF424 (0348-0043) Application for Federal Assistance	265	1	265	0.75	198.75
SF LLL (0348-0046) Lobbying Form	10	1	10	0.17	1.7
HUD-96011 (2535-0118) 3 <sup>rd</sup> Party Documentation Facsimile Transmittal	265	1	265	0.1	26.5
HUD -2993 Acknowledgement of Application Receipt (2577-0259)	13	1	265	0	0
Logic Model-HUD-96010 (2535-0114)	265	1	265	0	0
PCWA Statement of Need (maximum of 5 pages)	265	1	265	2.25	596.25
Memorandum of Understanding between PHA and PCWA	265	1	265	6	1590
Rating Criteria 1: Area-Wide Housing Opportunities. Narratives (up to 20 pages). Logic Model (HUD-96010)	265	1	265	3	795
Rating Criteria 2: PCWA Commitments. Narratives (up to 10 pages). Other Documentation	265	1	265	1.25	331.25
Rating Criteria 3: Self-Sufficiency Programs. Narrative: (up to 6 pages) Documentation: Excerpt from Administrative Plan or policies manual for FSS program operations Certification: FUP recipients enrolled in FSS	265	1	265	0.5	132.5
Rating Criteria 4: Local Coordination Letter of Support	265	1	265	1	265
PCWA Contractor Documentation	265	1	265	1	265
Funding Application HUD-52515 (2577-0169). Includes leasing schedule	265	1	265	.75	198.75
Affirmatively Furthering Fair Housing Statement (addendum)	265	1	265	1	265
HUD2880, Applicant/Recipient Disclosure/Update Report (2510-0011)	265	1	265	0	0
HUD2991, Certification of Consistency with the Consolidated Plan	265	1	265	0	0
Subtotal (Application)				0	0
Logic Model, HUD96010 (2535-0114)	42	1	42	0	0
Family Report HUD-50058 (2577-0083)	42	45.23	1900	.5	950
Program and Accounting Recordkeeping	42	1	42	10	420
Subtotal (Reporting/Recordkeeping)				10.5	1,3700
Total				028.27	6,035.7

The estimate of the total annual cost burden to respondents/recordkeepers resulting from the collection of this information is: 6,035.7 burden hours x \$34.34 = \$207,265.93; assuming a Manager's hourly rate at the GS-13/Step 1 level.

**13. Cost Burden of Information Collection:**

There are no start-up or additional costs to the respondents.

**14. Annualized Cost to Federal Government:**

Estimated annualized cost to the Federal Government for this collection:

	No. of Respondents	Hrs. per Response	Annual Hours	Cost Per Hour	Annual Cost to Federal Gov't
Receipt and processing of NOFA applications	265	16	4240	\$32.73*	\$138,775
Reviewing reports	42	0.5	375	\$32.73	\$8,250
Reviewing records	42	0.25	200	\$32.73	\$4,400
Total Cost					0

\*Represents GS-13/Step 5 Program Analyst or Housing Program Specialist hourly rate.

**15. Changes or Adjustments:** This is an extension of a previously approved collection. The changes in total burden hours is attributable to the incorporation of HUD's 2010 policy priorities into the FUP rating criteria, an expansion and refinement of criteria to be evaluated for FUP applications, and an adjustment to reflect that reporting and recordkeeping are only associated with respondents who selected to receive funding and not all applicants.

**16. Publication of Information Collection Results:**

Information collection results will not be published.

**17. Expiration Date:**

The OMB approval number and date will appear on the HUD-prescribed forms.

**18. Exceptions to Certification Statement:**

There are no exceptions to the certification statement identified in item 19.

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

There are no collections of information that employ statistical