U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

WASHINGTON, DC 20410-7000



ASSISTANT SECRETARY FOR COMMUNITY PLANNING AND DEVELOPMENT

AUG 1 0 2011

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

Dear Mr. Rutledge:

HUD is seeking emergency review of the Paperwork Reduction Act requirements contained in FY2011 Notice of Funding Availability (NOFA) for Neighborhood Stabilization Program Technical Assistance and Capacity Building; Request for Qualifications (NSP 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.

This emergency processing is requested to support and respond to three key issues: 1) the transformation of CPD's TA programs from separate, program-specific efforts to a coordinated, cross-program and place-based effort ("OneCPD"); 2) the new statutory requirements concerning the expenditure of funds by NSP3 grantees; and 3) HUD's NOFA Streamlining Initiative, which requires all program offices to obligate 100% of NOFA funds within 180 calendar days from the passing of the federal budget.

NSP TA is a CPD TA program being aligned under the new OneCPD framework. One goal is to ensure that all CPD TA programs use a very similar NOFA vehicle, including the same data collection forms. Therefore, HUD did not want to proceed using the old data collection methods for NSP TA until the new OneCPD TA process and forms were properly tested in FY2010. FY2010 OneCPD funds were obligated May 2011, and CPD held a "Listening Session" in June to gain feedback on the FY2010 NOFA process. Feedback from this process was incorporated into TA NOFAs and forms, including NSP TA, in July.

Furthermore, Congress included the statutory requirement for NSP3 that 50% of a recipient's grant amount must be expended within two years of the executed grant agreement, and 100% by year three. Additionally, past NSP TA funds are only allowed to support NSP1 and NSP2 grantees. There are 207 grantees under NSP3, many of who are new to the program. Thus, FY2011 NSP TA funds are in need *now* to meet statutory deadlines and support the timely provision of technical assistance to communities hardest hit by the housing crisis.

Because of these timing issues, which include the limitations of the HUD Reform Act and the major legislative changes imposed under NSP3, an emergency request is essential to ensure that critical technical assistance activities reach CPD grantees responding to legislative changes. It is also crucial for ensuring that the coordination being driven by OneCPD is a success and that HUD can obligate 100% of its NOFA funds within 180 days of the passing of the FY2011 federal budget.

In compliance with the requirements of 5 CFR 1320.13, this letter requests emergency processing within 14 days from the date of the <u>Federal Register</u> publication of the Notice of Submission of Proposed Information Collection to OMB.

Thank you for your consideration and assistance.

Sincerely,

Mercedes Márquez

Assistant Secretary for Community Planning and

Development (CPD)

Enclosures