

Supporting Statement for Paperwork Reduction Act Submissions

FY2011 Notice of Funding Availability (NOFA) for Neighborhood Stabilization Program Technical Assistance and Capacity Building; Request for Qualifications (NSP TA)

A. Justification

1. Circumstances that make the collection of information necessary.

This request is for clearance of the Narratives, Matrices, and Reporting Requirements that will be filled out by applicants of the NSP TA Program. *The purpose of these programs is to assess the need for technical assistance and to target technical assistance in order to achieve the highest level of performance and results for the programs administered by HUD's Office of Community Planning and Development.*

The NSP TA NOFA requires applicants to write a narrative designed to collect data on the organization applying for TA funding. Eligible applicants include states, units of local government, public housing authorities, non-profit organizations, for-profit entities, and joint applicants. The Narrative covers factors which evaluate the capacity, expertise, approach, and results and evaluation methods of potential grantees.

The Matrix Forms (Matrices) are designed to accompany the NOFA, and to collect data on the experience and expertise of the technical assistance applicants. Given the diversity of competencies required and the potential diversity in applicants, the Narrative and these Matrices together will serve the indispensable role of helping HUD to identify the strongest and most appropriate applicants for TA delivery.

The NSP TA Program requires quarterly reporting on:

- (1) The uses of the funds received detailed by task;
- (2) The amount of funds received obligated and expended.
- (3) Activity details will include: the name of the project or activity; a brief description of the project or activity; information on any subcontracts or subgrants awarded by the recipient to include the data elements required to comply with the Federal Funding Accountability and Transparency act of 2006 (P.L. 109-282).

2. How the information is used

The data collected through NSP TA will be used by HUD to determine the capacity, experience, and expertise of eligible applicants as well as to monitor their compliance and success post-award. Completed Narratives and Matrices will be reviewed by HUD staff and incorporated into the assessment of all applications. HUD will then rank applicants based on scoring criteria listed in the Program NOFA, and funds will be awarded accordingly.

The Matrices include two spreadsheets. Each includes a series of elements and indicators that allow for a comprehensive assessment of the applicant, the applicant's relevant history, and the applicant's proposed project staff.

The spreadsheets are comprised of the following:

- *NSP Technical Assistance and Capacity Building Experience Form*
 - (.xls or .xlsx format), includes an assessment of the applicants TA experience and measurable outcomes with the following: needs assessment; direct TA; tools and product development; and group learning.
- *NSP Technical Assistance and Capacity Building Expertise Form*
 - (.xls or .xlsx format) – includes an assessment of the expertise of the applicant's proposed project staff in areas such as, program requirements; project design; web technology; administration/management; skill areas; and reporting/data.

HUD will require NSP TA grantees to collect information on the activities undertaken with the respective funds. HUD collects this information from recipients through the Disaster Recovery Grant Reporting System (DRGR). HUD Headquarters will use the information collected through DRGR to track compliance with statutory commitment and

Signature of Senior Officer or Designee:

Date:

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expenditure requirements and to generate the OMB prescribed quarterly reports. Program management reports are generated by DRGR to provide data on the status of each recipient's commitment and disbursement of funds. HUD will use this data to compile reports used to manage the overall technical assistance program.

3. Improved technology.

The grants.gov interface allows for complete digital access to all of the NSP TA NOFA application materials, including the Narratives and Matrices. As a result, applicants can download forms in real time, fill out the application digitally, and submit electronically over the web.

In addition to using grants.gov, the Narratives and Matrices have been designed to reduce the overall burden on applicants compared to previous versions of similar forms. The Narratives can be submitted in any text or PDF format, making them easy to upload electronically. The Matrices are being submitted in Microsoft Excel format, which is much easier to populate and work with compared to the previous Microsoft Word format. This will save significant time for applicants as the spreadsheet layout is more appropriate for this type of information collection.

The collection of grant and task level information (collection of data on recipients, funds management, and task-level data) has been automated by DRGR. DRGR eliminates the need for respondents to submit paper quarterly reports. Once recipients are selected, they will be able to get system access by following the instructions on HUD's DRGR system website at <https://drgr.hud.gov/DRGRWeb/request.jsp>.

4. Efforts to identify duplication.

No similar information exists. The Narratives and Matrices will be collected once per year, based on unique applicant pools and comprised of year sensitive information. The Narratives and Matrices are program specific, and so are the only assessment tools available for HUD to determine the relevant and up-to-date capacity, experience and expertise of our TA applicants. The reporting information collected is task-specific, and, therefore, unique to each recipient's TA program.

5. Burden to small business or small entities.

Applications are submitted for this competition on a voluntary basis, and all application requirements and expectations are explicitly listed in published TA Program NOFA. Efforts have been made to reduce burden across the board and to create an accessible application by making the process web-based and fully digital, reducing the number of questions, simplifying existing questions, and offering the Narratives, Matrices, and Reporting Processes in a format that is familiar and easy to use. HUD expects that such organizations should have the capacity to adhere to the reporting requirements in the Notice that are necessitated by program management rules and the goal of prevention of fraud, waste and abuse.

6. Consequences if information is collected less frequently.

Less frequent data collection would damage HUD's ability to effectively manage technical assistance efforts and would not be consistent with government wide standards for the management of cooperative agreements. The loss of this collection mechanism would severely impair HUD's ability to assess TA providers and therefore reduce the efficiency with which we can provide sound and relevant assistance to CPD grantees. The net loss would accrue at the local level through less effective programming and reduced provider capacity. Failure to collect application data yearly would limit HUD's ability to incorporate timely knowledge about the applicant's recent activity, successes and failures, and therefore have the same net effect on outcomes. Failure to collect quarterly reports would significantly impair HUD's ability to assess awardees, make adjustments, and address significant challenges that arise during the grant term.

7. Special circumstances

None.

8. Public Notice.

In accordance with the Paperwork Reduction Act of 1995, the Department of Housing and Urban Development published a notice in the Federal Register on August XX, 2011 (Vol. XX, No. XX, pp. XXXX-XX) announcing the agency's intention to request an emergency OMB review of data collection activities for the NSP TA Program Narratives, Matrices, and Reporting Requirements. The notice provided a 14-day period for public comments.

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. Recipients are responsible for ensuring confidentiality when public disclosure is not required.

11. Questions of a Sensitive Nature.

None.

12. Annual Reporting and Recordkeeping Burden

The following table demonstrates the estimated paperwork burden for applicants in the pre-award process, and recipients in the post-award and reporting processes.

Description of Information Collection	Number of Respondents	Number of Responses	Total Responses	Hours Per Response	Total Hours
PRE-AWARD					
NSPTA Competition					
Narrative	60	1	60	60	3600
Matrices	60	1	60	16	960
POST-AWARD					
NSPTA Competition					
Grantee's Written Agreements	15	1	15	5	75
DRGR Activation, Activity Set-Up and Competition	15	2	30	10	300
Online Quarterly Reporting via DRGR	15	4	60	2	120
TOTAL PAPERWORK BURDEN	***				5,055

13. Estimate of Total Costs to Respondents (Capital Costs)

There are no capital costs for respondents beyond customary or usual business practices or that are not otherwise required to achieve regulatory compliance not associated with the collection of information for purposes of completing the NSP TA Program Narratives, Matrices, and Reporting Requirements.

14. Estimate of Annualized Cost to Federal Government

The cost to the government to review the submissions and reports for NSP TA (but not including the costs of follow-up management, technical assistance or monitoring) is estimated at **\$24,210**.

Application Review	10 hours X 60 submissions	600 hours
Reports and Recordkeeping Review and Management	1 hour X 105 reports/records	105 hours
Total hours		705 hours
Total cost to the Federal Government: 705 hours at \$34.34/ hour** (**This figure is based on GS-13 salary)		\$24,210

15. Explanation of Program Changes / Adjustments

This is a new information collection package.

16. Publication of Results

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. Display of the Expiration date for OMB Approval of the Information Collection

The OMB expiration date will be displayed on all data collection instruments. No exceptions are requested.

18. Explanation of Each Exception to 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.