

# Paperwork Reduction Act Submission

Please read the instruction before completing this form. For additional forms or assistance in completing this forms, contact your agency's Paperwork Reduction Officer. Send two copies of this form, the collection instrument to be reviewed, the Supporting Statement, and any additional documentation to: Office of Information and Regulatory Affairs, Office of Management and Budget, Docket Library, Room 10102, 725 Seventeenth St. NW, Washington, DC 20503.

1. Agency/Subagency Originating Request: <b>U.S. Department of Housing and Urban Development</b> Office of Fair Housing and Equal Opportunity		2. OMB Control Number: a. <b>2529-0051</b> b. <input type="checkbox"/> None	
3. Type of information collection: (check one) a. <input type="checkbox"/> New Collection b. <input type="checkbox"/> Revision of a currently approved collection c. <input checked="" type="checkbox"/> Extension of a currently approved collection d. <input type="checkbox"/> Reinstatement, <b>without change</b> , of previously approved collection for which approval has expired e. <input type="checkbox"/> Reinstatement, <b>with change</b> , of previously approved collection for which approval has expired f. <input type="checkbox"/> Existing collection in use without an OMB control number For b-f, note item A2 of Supporting Statement instructions.		4. Type of review requested: (check one) a. <input checked="" type="checkbox"/> Regular b. <input type="checkbox"/> Emergency - Approval requested by c. <input type="checkbox"/> Delegated  5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  6. Requested expiration date: a. <input type="checkbox"/> Three years from approval date      b. <input type="checkbox"/> Other (specify)	
7. Title: <b>Limited English Proficiency Initiative (LEPI) Program</b>			
8. Agency form number(s): (if applicable) SF-424, SF-424 SUPP, SF-424 CB, SF-424 CBW, SF-LLL, HUD-2880, HUD-27061, HUD-2990, HUD-2993, HUD-96010, and HUD-96011			
9. Keywords: Fair Housing, LEP, Translation services, Limited English			
10. Abstract: This collection is essential to HUD selecting qualified organizations to participate in the LEPI program. Further, this solicitation will enable the monitoring of the selected grantees' use of LEPI funds that is consistent with promoting the use of translated materials and other programs that support the assistance of persons with limited English proficiency in utilizing the services provided by the Department.			
11. Affected public: (mark primary with "P" and all others that apply with "X") a. Individuals or households      e. Farms b. Business or other for-profit      f. Federal Government c. P Not-for-profit institutions      g. State, Local or Tribal Government		12. Obligation to respond: (mark primary with "P" and all others that apply with "X") a. X Voluntary b. P Required to obtain or retain benefits c. Mandatory	
13. Annual reporting and recordkeeping hour burden: a. Number of respondents      30 b. Total annual responses      30 Percentage of these responses collected electronically      100% c. Total annual hours requested      2132 d. Current OMB inventory e. Difference (+,-) f. Explanation of difference: 1. Program change:      0 2. Adjustment:      NA		14. Annual reporting and recordkeeping cost burden: (in thousands of dollars) a. Total annualized capital/startup costs      \$0.00 b. Total annual costs (O&M)      \$0.00 c. Total annualized cost requested      \$0.00 d. Current OMB inventory      \$0.00 e. Difference      \$0.00 f. Explanation of difference: 1. Program change:      \$0.00 2. Adjustment:      \$0.00	
15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X") a. <b>P</b> Application for benefits      e. Program planning or management b. Program evaluation      f. Research c. General purpose statistics      g. Regulatory or compliance d. Audit		16. Frequency of recordkeeping or reporting: (check all that apply) a. <input type="checkbox"/> Recordkeeping      b. <input type="checkbox"/> Third party disclosure c. <input checked="" type="checkbox"/> Reporting: 1. <input type="checkbox"/> On occasion      2. <input type="checkbox"/> Weekly      3. <input type="checkbox"/> Monthly 4. <input checked="" type="checkbox"/> Quarterly      5. <input type="checkbox"/> Semi-annually      6. <input checked="" type="checkbox"/> Annually 7. <input type="checkbox"/> Biennially      8. <input type="checkbox"/> Other (describe)	
17. Statistical methods: Does this information collection employ statistical methods? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		18. Agency contact: (person who can best answer questions regarding the content of this submission) Name: Pamela D. Walsh Phone: 202-402-7017	

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## 19. Certification for Paperwork Reduction Act Submissions

On behalf of this Federal Agency, 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 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	Date:
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Signature of Senior Officer or Designee:  X Lillian L. Deitzer, Departmental Reports Management Officer Office of Investment Strategies, Policy, and Management, Office of the Chief Information Officer	Date:
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# Supporting Statement for Paperwork Reduction Act Submissions

## A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Office of Policy, Legislative Initiatives, and Outreach in HUD Headquarters will use the information provided in LEPI grant applications to objectively evaluate applicants on how well they meet the selection factors established in the NOFA. It will also assist in monitoring the selected grantees' compliance with program requirements.

The LEPI program seeks to enhance the development and coordination of workshops, training sessions, and/or the dissemination of LEP material to targeted LEP communities by eligible applicants. Eligible applicants include non-profit or faith-based community organizations that have engaged in providing LEP services to diverse populations and communities. Selected organizations will help: (1) identify and meet the needs of the targeted LEP population; (2) improve the participation of LEP persons in HUD programs, services, and activities; and (3) enhance the dissemination and communication of HUD programs, services, and activities in languages targeted to meeting the needs of local LEP populations.

2. Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

1. The information will be gathered and submitted by applicants and the recipients who receive LEPI NOFA funding. The information consists of the NOFA application, quarterly reports, and standard HUD forms (SF-424, SF-424 SUPP, SF-424 CB, SF-424 CBW, SF-LLL, HUD-2880, HUD-27061, HUD-2990, HUD-2993, HUD-96010, and HUD-96011).
2. 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 Policy, Legislative Initiatives, and Outreach in accordance with the requirements described in the FY2010/2011 Notice of Funding Availability. Additional information and other critical application submission requirements relating to the LEPI NOFA are available at [www.grants.gov](http://www.grants.gov). The NOFA solicits individual applications in accordance with funding availability and discusses the weighted rating factors used in selecting grantees. Funding will be awarded on a competitive basis.
3. The Department will use the requested information to assess the qualifications of organizations applying for funding under the LEPI program for the enhancement and dissemination of LEP material to targeted LEP populations.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

As indicated above, respondents are required to submit applications through E-Grants.gov.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

There is no duplication of information.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I) describe any methods used to minimize burden.

The collection of information involves non-profit and faith-based community organizations that are considered to be small entities. The Department has attempted to minimize the burden by limiting the requested information that will be used in assessing the organization's capacity and organizational experience in conducting the proposed LEP services and activities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Without benefit of the information requested and certified from applicants, the Department would not have any means for effectively evaluating the qualifications of eligible applications in providing LEP services to targeted populations. The Department could not ensure a fair competition for funding or certify that funds are used in accordance with statutes or implementing regulations.

Without quarterly reports, the Department is not able to measure the success of individual organizations in developing and coordinating workshops, training sessions, and/or disseminating LEP material to targeted LEP communities, in addition to managing grant funds.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
- requiring respondents to report information to the agency more than quarterly;
  - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
  - requiring respondents to submit more than an original and two copies of any document;
  - requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
  - in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;
  - requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
  - that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
  - requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special reporting requirements.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

- Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported.
- Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.

This information is collected in a manner consistent with guidelines of 5 CFR 1320.8(d). This was published in the Federal Register volume 76, page 81958 on December 29, 2011. No comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than reenumeration of contractors or grantees.

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

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

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.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

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

12. Provide estimates of the hour burden of the collection of information. The statement should:

- indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally estimates should not include burden hours for customary and usual business practices;
- if this request covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I; and
- provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

The Department estimates that application development and the completion of Logic Models and quarterly reports are anticipated to have the following reporting burdens:

	Number of Respondents	Frequency of Response	Hours/Response	Burden Hours
Application Development	30	1	70	2,100
Quarterly Reporting	4	4	2	32

The number of hours/response is an average based on grantee estimates of time to review instruction, search existing data sources, and prepare required responses to the application, complete quarterly reports, and required HUD forms.

**TOTAL BURDEN HOURS: 2,132**

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information (do not include the cost of any hour burden shown in Items 12 and 14).
- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;
  - If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
  - generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Estimates for grant applications, Logic Models, and quarterly reports are based on approximately 30 applications. Individual grantees are required to report, at minimum, four (4) times annually or quarterly on program performance and financial status.

The quarterly reports are required of the applicant to provide the Department with grid and narrative reporting of the status of program tasks and deliverables. The reporting process assists HUD in evaluating performance and providing early intervention if needed.

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 based upon proposed activity, size, or complexity.

Total costs were calculated (rounded to the nearest dollar):

Total Burden Hours (2,132) x Professional Hourly Rate (\$62.06) = \$132,312

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

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.

15. Explain the reasons for any program changes or adjustments reported in Items 13 and 14 of the OMB Form 83-I.

Not applicable.

16. For collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The Department may publish grantees' services and activities for press release.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

There is no request seeking approval not to display the expiration date for OMB approval of the information collection.

18. Explain each exception to the certification statement identified in item 19.

There are no exceptions to the certification statement identified in Item 19 of OMB Form 83-I.

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

This information collection does not employ statistical methods.

