
19. Certification for Paperwork Reduction Act Submissions

On behalf of the U.S. Department of Housing and Urban Development, 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:

Signature of Senior Officer or Designee:

X
Colette Pollard, Departmental Reports Management Officer,
Office of the Chief Information Officer

Date:

Supporting Statement for Paperwork Reduction Act Submissions

FY2012 Notice of Funding Availability (NOFA) for Office of Native American Programs Training and Technical Assistance

A. Justification

1. Circumstances that make the collection of information necessary.

This request is for clearance of the narratives and reporting requirements that will be filled out by applicants of the Office of Native American Programs (ONAP) Training and Technical Assistance Notice of Funding Availability (NOFA). The purpose of this program is to assess the need for training and technical assistance and to target training and technical assistance in order to achieve the highest level of performance and results for recipients of the Indian Housing Block Grant (IHBG) funds and Native Hawaiian Housing Block Grant (NHHBG) funds.

The ONAP Training and Technical Assistance NOFA requires applicants to write a narrative designed to collect data on the entity applying for training and technical assistance funding. Eligible applicants include nonprofit and for-profit entities. The narrative covers factors which evaluate the capacity, expertise, approach, and results and evaluation methods of potential awardees.

The ONAP Training and Technical Assistance NOFA 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 the ONAP Training and Technical Assistance NOFA 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 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 NOFA, and funds will be awarded accordingly through cooperative agreements.

HUD will require ONAP Training and Technical Assistance awardees 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 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 awardee's commitment and disbursement of funds. HUD will use this data to compile reports used to manage the overall training and technical assistance program.

3. Improved technology.

The Grants.Gov interface allows for complete digital access to all of the ONAP Training and Technical Assistance NOFA application materials, including the narratives. 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 have been designed to reduce the overall burden on applicants compared to previous requirements. The narratives can be submitted in any text or PDF format, making them easy to upload electronically.

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 will be collected once per year, based on unique applicant pools and comprised of year-sensitive information. The narratives 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 the applicants. The reporting information collected is task-specific, and, therefore, unique to each awardee's training and technical assistance 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 the published 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 and reporting processes in a format that is familiar and easy to use. HUD expects that the awardees should have the capacity to adhere to the reporting requirements in the NOFA 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 training and 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 training and technical assistance providers and therefore reduce the efficiency with which ONAP can provide sound and relevant assistance to IHBG and NHHBG recipients. 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.

This information collection was announced in the Federal Register, Volume 77, Page 16250, on March 20, 2012. Comments were received and are attached.

9. Payment or gifts.

None.

10. Assurance of Confidentiality

Awardees will collect and maintain records of information. Information on activities and expenditures of grant funds is public information and is generally available for disclosure. Awardees 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 awardees in the post-award and reporting processes. The applicants' total paperwork burden is estimated at 1,500 hours and the awardees' total paperwork burden is estimated at 1,830 hours.

Description of Information Collection	Number of Respondents	Number of Responses	Total Responses	Hours Per Response	Total Hours
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PRE-AWARD					
Application Preparation	25	1	25	60	1,500
POST-AWARD					
Awardees' Written Agreements	10	1	10	5	50
DRGR Activation, Activity Set-Up, and Completion	10	2	20	10	200
Online Quarterly Reporting via DRGR	10	4	40	2	80
TOTALS	55		95		1,830

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 ONAP Training and Technical Assistance NOFA program narratives and reporting requirements.

14. Estimate of Annualized Cost to Federal Government

The cost to the government to review the submissions and reports for the ONAP Training and Technical Assistance NOFA (but not including the costs of follow-up management, training and technical assistance, or monitoring) is estimated at \$10,989.

Task	Unit Calculation	Total
Application Review	10 hours X 25 submissions	250 hours
Reports and Recordkeeping Review and Management	1 hour X 70 reports/records	70 hours
Total Hours		320 hours
Total Cost to the Federal Government	320 hours at \$34.34/ hour (based on GS-13 salary)	\$10,989

15. Explanation of Program Changes / Adjustments

This is the first publication of the ONAP Training and Technical Assistance NOFA; therefore, there are no changes or adjustments.

16. Publication of Results

The information submitted is not published. Notice of the competition winners is published in the Federal Register approximately two 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.