

Supporting Statement for Paperwork Reduction Act Submissions

Housing Counseling Training Program SF-424, SF-424Supplement, HUD-424CB, HUD-2880

A. Justification

1. The Office of Housing Counseling is responsible for administering the Department's Housing Counseling Program, and its Housing Counseling Training Program as authorized by Section 106 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701x), and the Housing Counseling Program regulations at 24 CFR, part 214.

This collection is authorized Housing Counseling Training Program as authorized by Section 106 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701x), and the Housing Counseling Program regulations at 24 CFR, part 214., the Fair Housing Act (42 U.S.C. 3601-19), and the purpose is for each applicant to submit information to assist HUD in managing and monitoring HUD assisted housing counseling training programs, to protect the Government's interest and to verify the accuracy of the information received. This collection is mandatory. The information requested is required to obtain and retain benefits. HUD is authorized to collect this information under 24 CFR 5.218a "Penalties for failing to disclose and verify Social Security and Employer Identification Numbers".

The Housing Counseling Program supports the delivery of a wide variety of housing counseling services to low and moderate income homebuyers, homeowners, renters, and the homeless. The primary objectives of the program are to expand homeownership opportunities and improve access to affordable housing. Counselors provide guidance and advice to help families and individuals improve their housing conditions and meet the responsibilities of tenancy and homeownership. Counselors also help borrowers avoid predatory lending practices, such as inflated appraisals, unreasonably high interest rates, unaffordable repayment terms, and other conditions that can result in a loss of equity, increased debt, default, and foreclosure. There are more than 2,400 active HUD-approved housing counseling agencies (OMB Control No. 2502-0261).

2. To improve the quality and standardize the counseling that HUD approved counseling agencies provide, HUD implemented a Housing Counseling Training program in 2006. The Housing Counseling Training NOFA requests rating factors responses, forms, and supporting documentation used by HUD's Office of Housing Counseling to rank applications submitted through Grants.gov. The collection allows HUD to evaluate and select the most qualified applicant(s). The FY 2012 Notice of Funding Availability (NOFA) competed \$2.0 million for a one-year period. Three national housing counseling agencies were awarded funds. Each of these national housing counseling agencies has sub-grantees that are required to adhere to record keeping and reporting requirements. The collection of post award data during the grant management period is done electronically and the information is used to assure compliance with the grant agreement.

After consultation with three (3) grantees it was determined that the new personnel estimated that the time to process applications accounted for more time than previously estimate. This will account for the increase in burden hours previously reported.

3. Unless otherwise directed, applications in response to the proposed FY 2013 NOFA will be submitted electronically through Grants.gov. Electronic submission eliminates the burden on applicants to print, organize, and ship multiple copies of their applications. Additionally, Grants.gov auto-populates common elements of many forms, so that standard information about the applicant that appears on several forms only needs to be entered once. Documents such as letters of support, letters of matching funds, Memorandum of Understanding from proposed partners may be faxed.
4. The Housing Counseling Training Program is distinct from the Housing Counseling Program which requires similar forms for its applicants. However, the proposed data collection is not duplicative.
5. The information collected does not impact small businesses or small entities.
6. The collection is needed to ensure that applicants meet particular eligibility criteria and possess the capability to deliver effective and efficient services. Also, the collection is need for monitoring grant management.

7. There are no special circumstances causing an information collection to be conducted in the following manner: requiring reporting more often than quarterly; written responses in fewer than 30 days; submission of more than an original and two copies of documents; use of a statistical data classification not approved by OMB; pledge of confidentiality not supported by authority established in statute or regulation; and requiring submission of confidential information unless the agency can demonstrate it has instituted procedures to protect the information confidentiality.
8. Information collected is conducted in a manner consistent with the guidelines of 5 CFR 1320.8(d). The Notice announcing this collection of information appeared in the *Federal Register* on January 25, 2013 (Vol. 78/No. 17/page(s) 5479). No comments were received.

Estimates for the OMB-83i are based on consultation with the following national housing counseling agencies:

Neighborhood Reinvestment Corporation
1325 G St., NW Suite 800
Washington, DC 20005-3104
Verna Denchi

National Council of La Raza
1126 16th St., NW
Washington, DC 20036-4804
Lot Diaz

National Community Reinvestment Coalition
727 15th St., NW, Suite 900
Washington, DC 20005-6027
David Berenbaum

9. There are no payments to respondents, other than to awardees under the NOFA.
10. HUD is taking the standard precautions regarding the electronic transfer of sensitive information such as client level data, including firewall protection, encryptions, and access security. Additionally, the information provided is subject to the Privacy Act and may be made available only to the appropriate Federal, State, and local agencies.
11. There are no questions of a sensitive nature.

12. Estimate of public burden:

Information Collection	Number of Respondents	Frequency of Response	Number of Responses	Burden Hours per Response	Total Burden Hours	Hourly Cost	Total Annual Cost
One-time submission							
SF-424	3	1	3	0			
SF-424-Supp	3	1	3	0			
HUD-424CB (2501-0017)	3	1	3	0			
HUD-2880 (2510-0011)	3	1	3	0			
Rating Factors-Narratives 1-5	3	1	3	190	570	\$143	\$81,510
Post Award Submission	3	1	3	15.0	45.0	\$143	\$6435
Total	15		27		615	\$143	\$87,945
On-going requirement							
Grant Management – quarterly reporting	3	4	12	116	348	\$143	\$49,764
Total	3		24		348	\$143	\$49,764
Grand Total	15		51		963	\$143	\$137,709

The burden hour and hourly cost was based on consultation with three respondents. However, the data vary because of difference in size and complexity resulting in the estimates being average.

13. There are no additional costs to respondents.

14. Estimate of Costs to the Federal Government:

Information Collection	Number of Responses	Hours per Response	Total Hours	Hourly Cost	Total Annual Cost
One-time submission					
Review of applications	3	21	63	\$34	\$2,176
Ongoing requirement					
Grant Management – quarterly reporting	12	4	48	\$34	\$1,680
Grand Total	15		111		\$3,856

HUD personnel review the NOFA applications and monitor the awardees. The hourly rate is based on a GS-13-1 salary.

15. This is a revision of a currently approved collection. After consultation with three (3) grantees it was determined that the time for the new personnel to process applications accounted for more time than previously estimated. The current estimate is based on actual Housing Counseling Training Program awardee experience with the Training NOFA resulting in adjustments. Error in burden calculation was due to the program being new during the previous submission. Also, the HUD 96010- Logic Model, SF-LLL and HUD 2994a are no longer required forms. These forms do not effect how the counseling program is being administered.

16. HUD will publish the information on the selected grantee(s), including the name of the organization, the address, organization mission, and grant amount.

17. HUD is not seeking approval to avoid displaying the OMB expiration date.

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

B. Collections of Information Employing Statistical Methods

This collection does not employ statistical methods.