
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:

Date:

X
Milan Ozdinec, Deputy Assistant Secretary

Signature of Senior Officer or Designee:

Date:

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

Supporting Statement for Paperwork Reduction Act Submissions

Supporting Statement for Paperwork Reduction Act Submissions

Information Collection: Family Unification Program

A. Justification

1. The Department of Housing and Urban Development Appropriations Act, 2010 (Public Law 111-117, enacted on December 16, 2009) authorizes the HUD Secretary to use up to \$15,000,000 to competitively fund new vouchers to be used to promote the unification of families for whom the lack of adequate housing is a primary factor in the imminent placement of a family's child, or children, in out-of-home care; or the delay in the discharge of the child, or children, to the family from out-of-home care. Youths at least 18 years old and not more than 21 years old (have not reached their 22nd birthday) who left foster care at age 16 or older and who do not have adequate housing are also eligible to receive housing assistance under FUP. HUD posted a Notice of Funding Availability (NOFA) on Grants.gov on October 5, 2010 which contains the selection criteria for awarding FUP vouchers and specific requirements that will apply to selected applicants.

The Family Unification Program will employ a comprehensive approach to assisting at-risk families centered on providing adequate housing and supportive services in partnership between Public Housing Agencies (PHAs) and Public Child Welfare Agencies (PCWAs). The program aims to unify families for whom the lack of adequate housing threatens to place children in out-of-home care or delays the discharge of children to the family from out-of-home care by providing Housing Choice Vouchers to allow families to obtain adequate housing in the neighborhoods of their choice.

2. Eligible applicants interested in obtaining FUP funds will be required to submit applications to HUD, as explained in the FUP NOFA. The information collection covers the information needed from applicants to determine which applicants should be funded and program reporting and recordkeeping requirements. The information provided demonstrates the applicant plans to implement the program requirements, and includes related applicant history. The application will include such information as an MOU between the PHA and PCWA, narrative statements related to the program rating criteria, and other statements ensuring that the applicants meet HUD requirements. The information will be used by HUD staff to evaluate threshold requirements, rate and rank FUP voucher applications, and measure performance.

3. After the award of FUP vouchers, PHAs are expected comply with reporting requirements for the HCV program, covered in PRA 2577-0169 PHAs are also expected to inform HUD, not more than annually, if their baseline of FUP vouchers has changed.

4. **Technology applied to the collection:** This information collection is automated in order to improve data quality and to reduce the public reporting burden. Since FY 2005, the Department has required applications prepared in response to NOFAs to be submitted electronically via Grants.gov. Submission of baseline adjustments may be done via electronic mail.

5. Duplication of Effort:

There is no duplication of effort. Information collected is unique to each type of collection and does not duplicate any similar information or method.

6. Impact on Small Business and Small Entities:

These information collections have no significant impact on small businesses or other entities.

7. Consequence of Less Frequent Collection:

The Federal statutory mandate would not be met if the collection is not conducted. The information collection is necessary so that the available 2010 funds, per the appropriations act, may be awarded timely to successful applicants for the FUP program.

8. Special Circumstances for Information Collection:

There are no special circumstances that would cause these information collections to be conducted inappropriately.

9. Federal Register Notice and Public Comments: This information collection was announced in the *Federal Register* on October 26, 2011, Volume 76; page 66315. No comments were received.

10. Payment/Gifts to Respondents:

No payments or gifts are provided to respondents for any of these information collections.

11. Assurances of Confidentiality:

Assurance of confidentiality is neither provided nor needed for any of these information collections.

12. Questions of a Sensitive Nature:

No sensitive questions are being asked for any of these information collections.

13. Estimate of Annual Burden Hours for Information Collection: The chart below outlines the burden hours associated with the various aspects of the Family Unification Program NOFA and also includes the post-award submission of the Logic Model approved under another OMB approval to capture information associated with implementation of Area Wide Housing Opportunities sub-categories associated with HUD policy priorities.

Costs to the respondents to complete these information collections for the application process are indicated below.

Burden hours per application response are estimated at 18.02 hours and per post-award reporting and recordkeeping at 10.5 hours. Burden hours are estimated for 265 applicant respondents submitting NOFA applications and 42 applicants receiving funding and maintaining records and reporting on program implementation for a total burden of 6,101.95. Forms such as the SF 424 are not duplicative information. These forms, while authorized under different OMB Control Numbers, are submitted as part of the FUP application process and used specific to the applications' content.

Description of Information Collection	Number of Respondents	Responses per Year	Total Annual Responses	Hrs per Response	Total Burden Hours
SF424 (0348-0043) Application for Federal Assistance	265	1	265	0.75	198.75
SF LLL (0348-0046) Lobbying Form	10	1	10	0.17	1.7
HUD-96011 (2535-0118) 3 rd Party Documentation Facsimile Transmittal	265	1	265	0.1	26.5
HUD -2993 Acknowledgement of Application Receipt (2577-0259)	13	1	265	0	0
Logic Model-HUD-96010 (2535-0114)	265	1	265	0	0
PCWA Statement of Need (maximum of 5 pages)	265	1	265	2.25	596.25
Memorandum of Understanding between PHA and PCWA	265	1	265	6	1590
Rating Criteria 1: Area-Wide Housing Opportunities. Narratives (up to 20 pages). Logic Model (HUD-96010)	265	1	265	3	795
Rating Criteria 2: PCWA Commitments. Narratives (up to 10 pages). Other Documentation	265	1	265	1.25	331.25
Rating Criteria 3: Self-Sufficiency Programs. Narrative: (up to 6 pages) Documentation: Excerpt from Administrative Plan or policies manual for FSS program operations Certification: FUP recipients enrolled in FSS	265	1	265	0.5	132.5
Rating Criteria 4: Local Coordination Letter of Support	265	1	265	1	265
PCWA Contractor Documentation	265	1	265	1	265
HUD2990, Certification of Consistency with the RC/EZ/EC-II's Strategic Plan	265	1	265	0	0
Funding Application HUD-52515 (2577-0169). Includes leasing schedule	265	1	265	1	265
Affirmatively Furthering Fair Housing Statement (addendum)	265	1	265	1	265
HUD2880, Applicant/Recipient Disclosure/Update Report (2510-0011)	265	1	265	0	0
HUD2991, Certification of Consistency with the Consolidated Plan	265	1	265	0	0
Subtotal (Application)				18.02	4731.95
Logic Model, HUD96010 (2535-0114)	42	1	42	0	0
Family Report HUD-50058 (2577-0083)	42	45.23	1900	.5	950
Baseline adjustment	173	1	173	.5	86.5
Program and Accounting Recordkeeping	42	1	42	10	420
Subtotal (Reporting/Recordkeeping)				10.5	1,456.5 0
Total				028.52	6,188.4 5

Formal Agreement/MOU w/Applicant and State Health and Human Services/Medicaid Agency	70	1	70	1	70
Totals	335			29.52	6258.45

The estimate of the total annual cost burden to respondents/recordkeepers resulting from the collection of this information is: 6,101.95 burden hours x \$34.34 = \$209,540.96; assuming a Manager's hourly rate at the GS-13/Step 1 level.

13. Cost Burden of Information Collection:

There are no start-up or additional costs to the respondents other than those reported in Item 12 above in the Burden Cost Column.

14. Annualized Cost to Federal Government:

Estimated annualized cost to the Federal Government for this collection:

	No. of Respondents	Hrs. per Response	Annual Hours	Cost Per Hour	Annual Cost to Federal Gov't
Receipt and processing of NOFA applications	335	16	5360	\$34.34*	\$184,06.40
Reviewing reports	42	8	336	\$34.34	\$11,538.24
Reviewing baselines	173	1	173	\$34.34	\$5940.82
Reviewing records	42	4	168	\$34.34	\$5,769.12
Total Cost					\$207,310.58

*Represents GS-13/Step 1 Program Analyst or Housing Program Specialist hourly rate.

15. Changes or Adjustments to OMB Form 83-I:

The change in total burden hours is attributable to the incorporation of HUD's 2010 policy priorities into the FUP rating criteria, an expansion and refinement of criteria to be evaluated for FUP applications, and an adjustment to reflect that reporting and recordkeeping are only associated with respondents who selected to receive funding and not all applicants.

16. Publication of Information Collection Results:

Information collection results will not be published.

17. Expiration Date:

The OMB approval number and date will appear on the HUD-prescribed forms.

18. Exceptions to Certification Statement:

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

B. Collections of Information Employing Statistical Methods

There are no collections of information that employ statistical methods.