

**Supporting Statement for Paperwork Reduction Act Submission
Rural Capacity Building NOFA**

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.

On November 18, 2011, the President signed the Consolidated and Further Continuing Appropriations Act for Fiscal Year 2012 (P.L. 112-55), which provided a total of \$5 million to HUD for capacity-building activities for national organizations with expertise in rural housing, including experience working with rural housing organizations, local governments, and Indian tribes. Awardees will be selected through a competitive process, announced through a Notice of Funding Availability (NOFA). Applicants are required to submit certain information as part of their application for assistance.

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.

The information will be collected during the application process. Collection of these data will enable HUD to select awardees under a competitive process. Without the information, it would be impossible to determine which applications were eligible for award. The forms and uses of the forms are as follows:

SF-424: Application for Federal Assistance – This is an OMB form that is used government-wide to request Federal assistance. The Federal awarding agencies and OMB use information reported on this form for general management of Federal assistance awards programs.

SF-424 Supplement: Survey on Ensuring Equal Opportunity for Applicants - Ensures that all qualified applicants, small or large, non-religious or faith-based, have an equal opportunity to compete for Federal funding.

HUD 424CB: Grant Applications Detailed Budget – Applicant provides detailed budget information on its proposed activities.

SF LLL: Disclosure of Lobbying Activities – Applicants use this form to disclose any lobbying activities that will be use funds other than Federal appropriated funds to pay for influencing

or attempting to influence any officer or employee of the agency, member of Congress, or officer or employee of a member of Congress in connection with this Federal award.

HUD 2880: Applicant/Recipient Disclosure/Update Report – Applicants applying for and receiving more than \$200,000 must complete this form. Applicant provides HUD with information regarding other government sources and uses of funding along with a list of interested parties involved in the application for assistance.

HUD 2995: Certification of Consistency with Sustainable Communities Planning and Implementation – Applicants are required to complete this form to receive bonus points. The form documents the applicant's ability to meet the following criteria:

- (1) The applicant is engaged in activities, that in consultation with the designated Point of Contact of the HUD designated Preferred Sustainability Status Communities, further the purposes of the regional planning grant program;
- (2) The applicant's proposed activities either directly reflect the Livability Principles cited and contained in HUD's General Section to the FY2011 NOFAs or will result in the delivery of services that are consistent with the goals of the Livability Principles;
- (3) The applicant has committed to maintain an on-going relationship with the HUD Preferred Sustainability Status Communities for the purposes of being part of the planning and implementation processes in the designated area.

HUD 96011: Facsimile Transmittal - This form is a fax transmittal for documents that cannot be submitted electronically through grants.gov, i.e., leverage letters, documentation from books, reports or other such items. This form pre-populates from data entered in the SF-424 Gov.

Narratives (Rating Factors 1-5) – Applicants are required to respond to five factors that will discuss its capacity to administer the program as well as discuss the proposed activities that will be carried out with Rural Capacity Building funds during the term of the grant agreement. The factors provide relevant examples to support the proposal and describe the communities, populations, and organizations that the applicant proposes to serve and the specific outcomes expected as a result of the activities.

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.

Applications may be submitted electronically. All forms required for application

submission can be found in the application and instruction downloads on Grants.gov at

http://www.grants.gov/applicants/find_grant_opportunities.jsp.

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.

No similar information is available.

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 program does not involve small entities or businesses.

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.

If the information were not collected, HUD would have no way to select awardees for the grants.

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 often 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 that 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 secrets, 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

None.

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 on 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 may preclude consultation in a specific situation. These circumstances should be explained.

In accordance with the Paperwork Reduction Act of 1995, the Department of Housing and urban Development (HUD), published a notice in the Federal Register on April 23, 2012. The document number is volume 77 page 24213. One comment was received.

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

None.

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

None.

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.

None.

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 for approval 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.
- 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.

HUD estimates that each applicant spends approximately 40 person-hours to complete an application. HUD estimates the mean hourly rate at \$40. For 30 applications, that would be: 30 applications x 40 hours x \$40 per hour = \$48,000.

	Number of Respondents	Annual responses	Hours per response	Total hours	Cost per hour	Total Cost
Application	30	1	40	1200	\$40	\$48,000

Information will be collected once per applicant annually for each Rural Capacity Building Program NOFA. The total estimated average hourly burden for this information collection is 40 hours per applicant for a total of 1,200 hours for an estimated 30 applicants. Estimates are based on hours provided for similar programs to National nonprofit entities.

Paperwork Requirement	Number of Respondents	Frequency	Hours per response	Total Annual Hours
SF424	30	1	1	30
SF424 Supplement	30	1	.5	15
HUD424CB	30	1	5	150
SFLLL	30	1	.5	15
HUD 2880	30	1	.5	15
HUD 2995	30	1	.5	15
HUD96011	30	1	.5	15
Rating Factor 1	30	1	8.5	255
Rating Factor 2	30	1	5	150
Rating Factor 3	30	1	8	240
Rating Factor 4	30	1	5	150
Rating Factor 5	30	1	5	150
Total	30		40	1200

13. Provide an estimate for the total annual cost burden to respondents or record keepers 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 and 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 collections 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 **10/95** 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.

None.

14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

Approximately 30 applications are expected. Each application goes through a review which takes eight hours to conduct. This review is conducted by two people, having an average grade of GS-14 at an hourly rate of \$45. Thus, 30 applications x 2 persons x 8 hour x \$45 per hour = \$21,600.

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

None.

16. For collections 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.

Not applicable.

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.

Such approval is not requested.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

None.