Supporting Statement
Paperwork Reduction Act Submission

for

OneCPD Technical Assistance and Capacity Building
Needs Assessment

Office of Community Planning and Development
U.S. Department of Housing and Urban Development

Supporting Statement for Paperwork Reduction Act Submission

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A. Justification

A.1   Need and Legal Basis

Why is this information necessary? Identify any legal or administrative requirements that necessitate the collection.

This request is for clearance of data collection and reporting to enable the U.S. Department of Housing and Urban Development (HUD) Office of Community Planning and Development (CPD) to offer technical assistance (TA) and training to grantees through its OneCPD Integrated Practitioner Assistance Program (OneCPD). OneCPD was first authorized by HUD's Transformation Initiative contained in the Department of Housing and Urban Development Appropriations Act of 2010. The objective of OneCPD Technical Assistance and Capacity Building is to provide grantees with integrated TA to respond to the way grantees use HUD programs and to encourage place-based planning that is driven by local context and needs.

Prior to the Transformation Initiative, HUD provided grantees with program-specific TA for each of its four formula-funded programs: Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG and formerly the Emergency Shelter Grants), and the Housing Opportunities for Persons with AIDS (HOPWA) as well as programs funded competitively through the Continuum of Care (CoC). OneCPD Technical Assistance and Capacity Building aims to provide grantees with assistance that is more useful to them by recognizing that grantees develop multi-dimensional programs and often layer funding sources to maximize their benefit. The OneCPD TA initiative encourages grantees to ground their programs and projects in observed local need to "achieve sustainable place-based development and revitalization strategies."

While all of the formula and competitive programs have individual objectives, grantees overlap funding sources to leverage dollars and create programs and projects that are responsive to local needs, which are often multi-dimensional. With the OneCPD TA initiative, HUD designed an integrated model for evaluating programs and providing TA so that it may more effectively meet the capacity-building needs of grantees.

The first step in identifying a grantee's technical assistance needs is to conduct a needs assessment. HUD has contracted with TA providers to conduct comprehensive or targeted needs assessments, depending on the specific needs of the grantee. In a comprehensive needs assessment, the TA provider will examine all of the grantee's HUD-funded programs and activities. For a targeted needs assessment, the TA provider will assess one or more of the grantee's programs as determined by HUD.

There are several components to the OneCPD Needs Assessment (NA): a grantee self-assessment, a HUD Field Office assessment and the TA provider assessment. The grantee self-assessment asks the grantee to rate its performance for a range of activities related to program management and implementation of activities. The HUD Field Office staff also rates grantee performance in the same areas. The rating scores become data that are entered into an online assessment tool. The TA provider assessment is more involved than the grantee and HUD Field Office assessments and relies on

gathering information from the grantee and its subrecipients, and includes file review, a site visit, and an extensive interview process.

The grantee performance ratings generated by the grantee, HUD Field Office, and TA provider will be collected in the OneCPD NA via the TA Portal on the OneCPD Resource Exchange (ORE). The TA Portal wireframes are located at Attachment A.

A.2   Information Users

How is the information collected and how is the information to be used?

The information to support the performance ratings that will be entered into the TA Portal will be collected through a combined effort of HUD Field Office staff, grantees, grantee sub-recipients, and the TA provider.

HUD staff will assess the grantee's performance and enter ratings into one area of the TA Portal. The grantee will conduct a self-assessment and record its findings online as well. Through the collection and review of files, staff and sub-recipient interviews, the TA provider will conduct a needs assessment for the grantee. The results of the needs assessment will be recorded via the TA Portal, along with the HUD Field Office and grantee self-assessments.

HUD has developed an interview protocol for TA providers to follow when conducting on-site interviews with grantee staff and subrecipients. These interviews will inform how the TA provider will rate the grantee's performance in several areas including:

PROGRAM MANAGEMENT – Does the grantee manage its activities and programs efficiently, effectively, accurately and in a timely manner?
Planning & Coordination
Management & Staffing
Program Administration
Underwriting & Project Selection
Construction
Cross Cutting Federal Requirements
Financial & Grants Management
Reporting & Monitoring
ACTIVITIES– For all applicable grantee activity types, does the design and implementation achieve its intended outcomes?
Rental Housing Development
Single Family Development
Homeowner Rehabilitation

Homebuyer Assistance
Homelessness Prevention & Assistance
HIV/AIDS Housing Programs
Economic Development
Public Facilities
Tenant Based Rental Assistance
Services
Disaster Recovery
Other:
Other:
Colonia Set-Aside
PROGRAM REQUIREMENTS – For all applicable HUD CPD formula grant programs, does the staff understand the program rules and is the program well managed?
CDBG
CDBG-108
CDBG-Disaster Recovery
HOME
ESG
HOPWA

NOTE: Competitive programs (CoC and Rural Housing Stability) will be added in FY13.

In addition to entering numerical ratings, the TA provider will enter comments into the TA Portal to highlight particular areas of grantee strength or weakness. The information collected in the will be used to target TA to the grantee in areas most needed. The information will not be used to evaluate or monitor grantee programs for compliance and future funding.

Following completion of the needs assessments, HUD will formulate a plan for TA delivery to grantees. The plan will be based on the findings from the needs assessment and may include TA in the following areas (this is not an exhaustive list): program redesign and restructure, program implementation and capacity building, outreach and stakeholder participation in planning, integrating compliance into program management, and strategic planning.

HUD will contract with outside TA providers with expertise in the targeted TA areas to work with grantees to increase their capacity. Technical assistance may be provided on an ongoing basis or for a

limited time period. This information will not be accessible by the general public, but rather is for internal HUD staff and grantee use.

In general, the TA Portal will collect the following information. Line-by-line explanation and justification of the portal is included in Attachment B.

Exhibit A.2.   Information Collected by the Online Portal

Information Inputs	
Field Office info	Identifies CPD Field Office
Work Plan number	HUD identifier for technical assistance work
List of administrative entities	Lists name(s) of grantee(s)
List of assessment team members	Identifies the TA provider team members who will conduct the site visit and needs assessment for the grantee.
List of interviews conducted	Lists people and organizations interviewed in the needs assessment process, including during site visits and remotely.
List of documents reviewed	Lists files and documents reviewed by TA provider during needs assessment process.
Grantee self-assessment	Grantee assesses its performance and capacity in several areas including: program management, activity performance, and funding program requirements
CPD Field Office assessment	CPD Field Office assesses the grantee's performance and capacity in several areas including: program management, activity performance, and funding program requirements
TA Provider assessment	TA Provider assigns a numerical rating to assesses the grantee's performance and capacity in several areas including: program management, activity performance, and funding program requirements
Overall assessment	TA Providers enters summary text giving an overview of the grantee needs assessment.
TA capacity building priority needs	TA Providers identify areas where the grantee has the greatest TA and capacity building needs.
Grantee overview	Provides a description of the grantee's organizational structure, inter- and intra-governmental partnerships and other relationships with non-governmental organizations.

Scope of work	Identifies the extent of the needs assessment, whether it is targeted to some programs or is a comprehensive needs assessment.
Market observations	TA Providers record any notable local factors that may influence a grantee's performance or areas where targeted capacity building is needed.
Capacity gaps by topic	For areas identified as capacity gaps, TA providers provide a description of the gap and what needs improvement.

A.3   Use of Improved Technologies

Describe whether, and to what extent, the collection of information is automated (item 13b1 of OMB form 83-i). If it is not automated, explain why not. Also describe any other efforts to reduce burden.

A.3.1   Use of Information Technologies

For several years, HUD had been utilizing improved information technologies to assist its grantees with application submittal, financial management and performance tracking. In this vein, HUD will use a web portal on the OneCPD Resource Exchange (ORE) to collect and report information for the OneCPD Needs Assessments. Upon completion of an assessment, TA providers will enter their findings into the online portal. This will facilitate transfer of this information to HUD and present it in a format that HUD easily may manipulate to generate reports and conduct analysis of grantee TA needs.

To further facilitate data entry the portal will have the following functionalities:

1. ***Some information will be pre-filled***. The TA Portal is built on a database platform so that once data is entered into a field, the information will carry through to all areas of the portal requiring the same information.

2. ***Multiple reporting modules***. The TA Portal will allow the user to customize reports for a particular grantee, across grantees or capacity needs. This will enable HUD to easily analyze technical assistance needs among grantees from multiple angles and respond appropriately.

3. ***Use of pick-lists or drop-down menus***. The TA Portal will be pre-populated with some data including grantee names, addresses, HUD Field Office relationships and TA provider firms.

4. ***Automated calculations***. The portal will have the ability to automatically calculate average ratings in each assessment area.

5. ***Other key features include***:
   - Secure data entry: the user will be required to enter a user name and password to access the portal.

   - Navigation to access different sections sequentially or non-sequentially.

- Help features: The instructions and guidance on rating grantees and entering data into the portal will be linked to the portal.

- Integrated method for HUD review and approval—including interactive messaging with TA provider to address questions/corrections; and HUD review and approval.

A.3.2 Reduction of Burden

Every effort has been made to reduce burden on communities to collect and provide information for the OneCPD Needs Assessments. All of the information requested is maintained by grantees and the grantee will simply need to assemble it for the TA Provider. Many, if not all, data items are available in electronic format and the TA Provider will depend on the grantee's Consolidated Plan (with Amendments), Annual Action Plan, and automated reports generated through IDIS, the CAPER and other program-specific performance reports for baseline information.

A.4   Efforts to Avoid Duplication

Is this information collected elsewhere? If so, why cannot any similar information already available be used or modified?

The OneCPD TA program is the first of its kind in that it provides integrated TA to grantees that cuts across several funding programs including: the Community Development Block Grant (CDBG) program and ancillary programs, the HOME Investment Partnerships (HOME) program, the Emergency Solutions Grant (ESG) program, and the Housing Opportunities for Persons with AIDS (HOPWA) program. While the TA provider will rely heavily on existing information maintained by the grantee, HUD has not conducted grantee needs assessments in this form prior to the OneCPD initiative. Through OneCPD, TA providers will conduct a comprehensive assessment of grantees strengths and weaknesses and identify areas of innovation. The results of the assessment will inform HUD of the grantees' TA needs and encourage sharing of best practices among grantee communities.

The OneCPD needs assessment, as a collection of data and program evaluation, is not duplicative of any information currently available and is tailored to each individual grantee.

A.5   Involvement of Small Entities

Does the collection of information impact small businesses or other small entities (item 5 of OMB form 83-i)? Describe any methods used to minimize burden.

Some small grantees will receive needs assessments through the OneCPD TA program based on HUD's determination that grantees need technical assistance to address grant compliance or capacity issues. TA providers will work with grantees to reduce any burden caused by their participation in the program.

TA providers will prepare grantees for needs assessment site visits by holding pre-visit conference calls to explain the purpose and procedures of the visit. Grantees will supply providers with background documents and reports that are readily available. These documents are often in electronic format and sometimes accessible online. TA providers will prepare for site visits by learning about the grantee's programs, issues and concerns prior to the visit and will ensure that while on site, the

TA provider uses the grantee's time to learn about aspects of the programs that cannot be learned elsewhere.

A.6 Consequences of Less Frequent Data Collection

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.

HUD has designed the OneCPD TA Needs Assessment data collection as a one-time, up-front effort to understand a grantee's strengths and weaknesses in managing CPD funds. The needs assessment will rate the grantee's performance and capacity across a wide range of management, activity and program areas. To evaluate grantee performance, the TA provider will collect information through personal interviews and review of files, planning documents and reports.

HUD will use the ratings to determine the grantees areas of strength and weakness, and identify their TA needs. Then, HUD will be able to fill TA gaps for grantees, helping them to more effectively disseminate and manage funds through the various HUD programs.

The OneCPD TA program has five specific objectives. By providing tailored technical assistance that cuts across programs, HUD hopes to:

- Improve grantees' ability to assess conditions in the affordable segment of their local housing markets and commercial real estate markets, business and employment trends and other public and private investments known to be underway in their areas.

- Improve grantees' ability to design, implement, and leverage housing and community and economic development programs based upon an accurate assessment of their local markets and investment landscape.

- Assure timely and effective performance by grantees and their partners, as well as effective project tracking and monitoring.

- Improve grantees' understanding of, and compliance with, statutory and regulatory requirements.

- Foster innovation in housing and community development program design and finance.

There are no technical or legal obstacles to reducing burdens.

A.7 Special Circumstances

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320.6 (Controlling Paperwork Burden on the Public—General Information Collection Guidelines). There are no special circumstances that require deviation from these guidelines.

Exhibit A.7 Responses to Special Circumstances

Response to Special Circumstances	
Require respondents to report information to the agency more often than quarterly;	OneCPD is a one-time needs assessment to help HUD provide targeting TA to grantees.

Requiring respondents to prepare a written response to a collection of information in fewer than 30 days of it;	Grantees will be asked to complete the self-assessment section of the needs assessment prior to the TA team's site visit. The grantee will be given approximately two weeks to complete this task; however the self-assessment should not take more than three hours to complete.
Requiring respondents to submit more than an original and two copies of any document;	Grantees and other respondents will not be required to submit more than one copy 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;	For the purpose of the needs assessment, grantees will not be required to retain records beyond normal HUD requirements.
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;	The needs assessment does not include a statistical survey across grantees.
Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;	The needs assessment does not include use of statistical data classifications.
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.	Grantees and other respondents will not be asked to pledge confidentiality. However, TA providers will maintain the confidentiality of respondents during interviews and present issues to HUD in summary form. Data entered into the OneCPD Project Portal will only be visible to the TA team, grantee and HUD staff. Grantees will not have access to each other's assessment results.
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.	Grantees and other respondents will not be required to submit proprietary trade secrets. All PII will be redacted from files, protecting the information's confidentiality.

A.8 Consultations Outside the Agency

Identify the date and page number of the Federal Register notice (and provide a copy) soliciting comments on the information. Summarize public comments and describe actions taken by the agency in response to these comments. Describe all efforts to consult with persons outside the agency.

In accordance with the Paperwork Reduction Act of 1995, the Department of Housing and Urban Development published a notice in the Federal Register on September 04, 2012 vol 77, page 53903 announcing the agency's intention to request an OMB review of data collection activities for the OneCPD Technical Assistance Needs Assessment. The notice provided a 60-day period for public comments. A copy of the Notice is in Attachment C. No comments received

HUD worked with a small group of experienced TA providers to develop the OneCPD Needs Assessment Tool and online TA Portal. In the course of its development, the tool went through several iterations, and HUD sought review and comment from TA providers during each phase of its development.

A.9 Payment to Respondents

Explain any payments or gifts to respondents, other than remuneration of contractors or grantees.

HUD does not provide remuneration to grantees for completion of the OneCPD Needs Assessment.

A.10 Arrangement and Assurances Regarding Confidentiality

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

The OneCPD Needs Assessment report and portal contain only rating scores and summary–level data and descriptions on grantee programs and activities. All information that the TA provider collects during interviews, including discussion content, will be summarized for the report and personal confidentiality will be maintained.

Data entered into the OneCPD Project Portal will only be visible to the TA team and HUD staff. Grantees will not have access to each other's assessment results.

A.11 Sensitive Questions

Justify any questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private.

The OneCPD Needs Assessment does not include questions of a sensitive nature for HUD grantees or subrecipients.

A.12   Estimate of Annualized Burden of Hours

Estimation of the total number of hours needed to prepare the information collection including number of respondents, frequency of response, and hours of response. The total number of burden hours is based on conducting the following assessments.

Exhibit A.12.1 Estimated number of Respondents

	Number of Grantees Receiving Needs Assessment	
	3-Year Period	**Annually**
Blended Needs Assessment	240	80
Targeted Needs Assessment	120	40
TOTAL	**360**	**120**

Estimated Burden

Blended Needs Assessment
   Grantee: 63 hours
   - Collect required documentation averages 6 hours.
   - Complete the activity program matrix and self-assessment averages 3 hours.
   - Meet with TA team during site visit(s) averages 54 hours.

   TA Provider: 156 hours
   - Conduct site visit averages 96 hours
   - Enter data collected and observations into online NA tool and prepare NA report averages 60 hours

   HUD: 3 hours
   - Complete Field Office assessment

Targeted Needs Assessment
   Grantee: 30 hours
   - Collect required documentation averages 4 hours.
   - Complete the activity program matrix and self-assessment averages 2 hours.
   - Meet with TA team during site visit averages 24 hours.

   TA Provider: 76 hours
   - Conduct site visit averages 36 hours
   - Enter data collected and observations into online NA tool and prepare NA report averages 40 hours

HUD: 2 hours
- Complete Field Office assessment

Exhibit A.12.2 Overall Burden

Annual Number of Respondents	Responses per Respondent	Per Respondent Burden (Hours)	Annual Burden (Hours)	Average Burden (Hours)
40 Grantees	1	Targeted: 30	1,200	52.0
80 Grantees	1	Blended: 63	5,040	
120 Grantees			**6,240**	

Exhibit A.12.3 Estimated Annualized Cost

Annual Number of Respondents	Burden Hours	Hourly Rate (Includes Fringe)	Total Respondent Cost	Average Respondent Cost
40 Grantees	30	$59.46	$71,352.00	
80 Grantees	63	$59.46	$299,678.40	$3,091.92
120 Grantees			**$370,103.04**	

Hourly rates based on May 2011 Department of Labor, Bureau of Labor Statistics, National Occupational Employment & Wages Statistics, median rate of $45.74 for General and Operations Manager. Fringe costs of 30% added. For DOL rates, visit: http://www.bls.gov/oes/current/oes_nat.htm.

A.13   Capital Costs

Estimate the annual capital cost to respondents or record keepers.

There are no capital costs for respondents beyond customary or usual business practices or that are not otherwise required to achieve regulatory compliance.

A.14   Estimated Cost to Federal Government

Estimate annualized costs to the Federal government.

The overall estimated annualized cost of conducting the assessments is based on time spent by HUD Field Office staff and labor and other direct costs for the TA providers, as contractors to the Federal government.

Exhibit A.14.1 Annual Estimated Cost for Needs Assessments

ANNUAL ESTIMATED LABOR COSTS FOR NEEDS ASSESSMENTS		
	TASK	**COST**
TA Provider	40 Targeted @ 76 hours X $57.33/hour	$174,283.22
TA Provider	80 Blended @ 156 hours X $57.33/hour	$715,478.40
TA Provider	Other	$216,000.00
HUD FO	40 Targeted @ 2 hours X $42.55/hour	$3,404.00
HUD FO	80 Blended @ 3 hours X $42.55/hour	$10,212.00
TOTAL		**$1,119,377.62**
Note: Hourly rates for HUD FO based on FY2012 General Schedule Pay Table, Grade 15, Step 5 ($32.73). Hourly rates based on May 2011 Department of Labor, Bureau of Labor Statistics, National Occupational Employment & Wages Statistics, median rate of $44.10 for Training Manager. Fringe costs of 30% added to all hourly rates so actual rates used were $42.55 and $57.33 respectively. For DOL rates, visit: http://www.bls.gov/oes/current/oes_nat.htm. For GS rates, visit: http://www.opm.gov/oca/12tables/pdf/gs_h.pdf. TA provider costs also include travel and other direct costs.		

A.15   Reasons for Change in Burden

Explain any program changes or adjustments in burden.

The OneCPD Needs Assessment will not prompt any program changes or adjustments in burden for grantees. The data collection is a one-time event that will not lead to ongoing changes in data collection or additional burdens for grantees.

A.16   Tabulation Plan, Statistical Analysis and Study Schedule

If the information will be published, outline plans for tabulation and publication.

The results of the OneCPD NA data collection will not be published, but will be available to grantees and HUD staff through the online portal.

A.17   Expiration Date Display Exemption

Explain any request to not display the expiration date.

The OMB expiration date will be displayed on all data collection instruments. No exceptions are requested.

A.18   Exceptions to Certification

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

There are no exceptions to the certification.

Part B: Statistical Methods

No statistical methods are used to complete the OneCPD Needs Assessments.