

Supporting Statement for Paperwork Reduction Act Submissions

HOME Investment Partnerships Program

A. Justification

1. Circumstances that make the collection of information necessary.

Public Law 101-625 (104 Stat. 4079), Title II of the Cranston-Gonzalez National Affordable Housing Act, as amended established the HOME Investment Partnerships Program (HOME). Under the HOME Program, HUD allocates funds by formula among eligible units of State and local governments to strengthen public-private partnerships for the production of affordable housing for low-income families. Participating jurisdictions (PJs) use HOME funds directly to carry out housing activities and provide funds to other eligible entities, such as Community Housing Development Organizations (CHDOs) and other nonprofit and for-profit developers. State PJs may administer their HOME programs directly, suballocate funds to local governments (State recipients) or combine the two approaches. HOME funds are used to leverage private investment in affordable housing. PJs are required to match Federal HOME funds with State, local or private funds and resources. PJs and other entities may use HOME funds to carry out multi-year housing strategies with a variety of eligible uses, including rehabilitation and substantial rehabilitation of substandard housing, new construction and tenant-based rental assistance. PJs and other eligible entities may provide HOME assistance in a number of eligible forms, including grants, loans, loan guarantees, advances, equity investments, interest subsidies and other forms of investment.

The HOME statute imposes a number of data collection and reporting requirements on the Department and on program participants. Information on assisted properties as well as on the owners or tenants of the properties is needed to fulfill the statutory requirements.

While the narrative requirements for the HOME Program annual performance report have been moved to the Consolidated Plan rule (24 CFR Part 91), the Department is continuing to require that two reporting forms (HUD 40107 and HUD 40107A) be submitted under Part 92.

Two other forms, HUD 40093 and SF 1199A are included in this submission. Form HUD 40093 is the grant agreement executed between Participating Jurisdictions and HUD. It does not collect any individual identifying information. SF 1199A is the Direct Deposit form that Participating Jurisdictions submit to inform HUD of how they will receive funds. None of these forms collect individual identifying information.

All of the elements of data collection included herein are required under the statute authorizing HOME or related authorities.

2. How the information is used

HUD requires state and local PJs to collect information on the activities undertaken with HOME funds. HUD collects this information from its PJs through its Integrated Disbursement and Information System (IDIS) (§ 92.502). The PJ's manually input data using an internet connection. The information is collected periodically as HOME projects are set up and completed. HUD Field Offices, HUD Headquarters, and HOME PJs use the information collected through IDIS. HUD uses the information on program funds committed and disbursed to track PJ performance and to determine compliance with the statutory 24-month commitment deadline and the regulatory 5-year expenditure deadline (§ 92.500(d)).

The project-specific property, tenant, owner, and financial data is used to compile annual reports to Congress required at Section 284(b) of the Act, as well as to make program management decisions about how well program participants are achieving HOME's statutory objectives. Program management reports are generated by IDIS to provide data on the status of each PJ's commitment and disbursement of HOME funds. These reports are readily available on the HOME website (www.hud.gov/homeprogram/).

Management reports required in conjunction with the Annual Performance Report (§ 92.509) are used by HUD Field Offices to assess the effectiveness of locally designed programs in meeting specific statutory requirements and by Headquarters in preparing the Annual Report to Congress. Specifically, these reports permit HUD to determine compliance with the requirement that PJs provide a 25% match for HOME funds expended during the Federal fiscal year (Section 220

of the Act) and that program income be used for HOME eligible activities (Section 219 of the Act), as well as the Women and Minority Business Enterprise requirements (§ 92.351(b)).

Financial, project, tenant, and owner documentation is used to determine compliance with HOME Program cost limits (Section 212(e) of the Act), eligible activities (§ 92.205), and eligible costs (§ 92.206), as well as to determine whether program participants are achieving the income targeting and affordability requirements of the Act (Sections 214 and 215). Other information collected under Subpart H (Other Federal Requirements) is primarily intended for local program management and is only viewed by HUD during routine monitoring visits. The written agreement with the owner for long-term obligation (§ 92.504) and tenant protections (§ 92.253) is required to ensure that the property owner complies with these important elements of the HOME Program and are also reviewed by HUD during monitoring visits. HUD reviews all other data collection requirements during monitoring to assure compliance with the requirements of Title II and other related laws and authorities.

3. Improved technology.

The collection of HOME Program information (collection of data on funds management, project and tenant characteristics, and owner data) has been automated by IDIS. IDIS eliminates the need for PJs to submit paper reports. The submission of Action Plan related documents by PJs to the Field Office is also automated. All of the data elements of the IDIS systems and Consolidated Plan are required under Title II or related authorities.

4. Efforts to identify duplication.

No similar information exists. The information collected through IDIS is project-specific and, therefore, unique to each PJ's local HOME program. Other recordkeeping requirements (e.g., property standards, written agreements, tenant protections) are project- or program-specific and unique to local HOME programs. Documentation relating to nondiscrimination, displacement and relocation and lead-based paint are unique to individual program designs and do not result in duplication of effort.

5. Burden to small business or small entities.

None.

6. Consequences if information is collected less frequently.

The information is collected on a project-by-project basis to permit PJs to draw down HOME funds from the U.S. Treasury and to ensure that HOME funds are used for eligible purposes. It is not possible to collect the information less frequently.

7. Special circumstances

None.

8. Public Notice.

The notice of proposed information collection was published in volume 77, number 209, page 65571 of the *Federal Register* on October 29, 2012. Comments were due by December 28, 2012.

9. Payment or gifts.

None.

10. Assurance of Confidentiality

Recipients of the assistance will collect and maintain records of information. Information on activities and expenditures of grant funds is public information and is generally available for disclosure. Recipients are responsible for ensuring confidentiality when public disclosure is not required.

11. Questions of a Sensitive Nature.

None.

12. Annual Reporting and Recordkeeping Burden

Reg. Section	Paperwork Requirement	Record Keeping Hours	Reporting Hours	Number of Jurisdictions	Total Hours
§ 92.200	Private-Public Partnership	2		594	1,188
§ 92.201	Distribution of Assistance	2		594	1,188
§ 92.202	Site and Neighborhood Standards	2		594	1,188
§ 92.203	Income Determination	2		6,667	13,334
§ 92.206	Documentation required by HUD to be included in project file to determine project eligibility i.e., eligible uses and costs, cost limits, mixed-projects and value	5		6,667	33,335
§ 92.216					
§ 92.217					
§ 92.218					
§ 92.250					
§ 92.252					
§ 92.254					
§ 92.251	Written Property Standards	1		6,667	6,667
§ 92.253	Tenant Protections (including lease requirement)	5		6,667	33,335
§ 92.254	Homeownership - Median Purchase Price	5		80	400
§ 92.300	CHDO Identification	2		594	1,188
§ 92.300	CHDO Project Assistance	2		594	1,188
§ 92.303	Tenant Participation Plan	10		4,171	41,710
§ 92.350	Equal Opportunity (including nondiscrimination, and minority and women business enterprise and minority outreach efforts)	5		6,667	33,335
§ 92.351	Affirmative Marketing	10		6,667	66,670
§ 92.353	Displacement, relocation and acquisition (including tenant assistance policy)	5		6,667	33,335
§ 92.354	Labor	2.5		6,667	16,667.50
§ 92.355	Lead-based paint	1		6,667	6,667
§ 92.357	Debarment and Suspension	1		6,667	6,667
§ 92.501	HOME Investment Partnership Agreement (HUD 40093)	1		598	598
§ 92.504	Participating Jurisdiction's Written Agreements	10		6,667	66,670
§ 91.616	Confirm first-time homebuyer status	0.1		427	43
§ 92.61	Program Description and Housing Strategy for Insular Areas		10	4	40
§ 92.66	Reallocation - Insular Areas		3	4	12
§ 92.101	Consortia Designation		5	36	180
§ 92.201	State Designation of Local Recipients		1.5	51	76.5
§ 92.206	Eligible Costs - Refinancing		4	100	400
§ 92.254	Homeownership - Alternative to Resale/recapture		5	100	500
§ 92.300	Designation of CHDOs		1.5	480	720
§ 92.501	HOME Investment Partnership Agreement (HUD 40093)		1	598	598
§ 92.502	Homeownership and Rental Set-Up and Completion (IDIS)		16	594	9,504
§ 92.502	Tenant-Based Rental Assistance Set-Up (IDIS)		5.5	225	1,237.50
§ 92.502	IDIS Performance Measurement Set-Up and Completion Screens		21	6,671	140,091
§ 92.509	Annual Performance Reports (HUD 40107)		2.5	598	1,495
§ 92.509	Management Reports - FY Match Report (HUD 40107A)		0.75	594	445.5
§ 91.220	Describe the use of ADDI funds		1	427	427
§ 91.220	Describe the plan for outreach		1	427	427
§ 91.220	Describe plan to ensure suitability of families		1	427	427
§ 91.604	Describe prior commitment		1	37	37
§ 92.502	Input first-time homebuyer status (IDIS)		0.2	427	85
§ 92.502	IDIS Access Request form (HUD 27055)		0.5	50	25
	Direct Deposit Sign up form (SF 1199A)		0.16	10	1.6
Total Annual Respondents and Burden Hours		73.1	80.61	6,617	522,078
Estimate of Respondent Cost: 522,103 hours x \$31/hour* = \$16,184,418					
(This figure is based on GS-12 salary)					

These estimates are calculated based on the number of HOME program participants that are impacted by each regulatory section.

13. Estimate of Total Costs to Respondents

There are no additional costs to the respondents (other than the cost shown in item 12 above).

14. Estimate of Annualized Cost to Federal Government

The cost to the government to review the reports (but not including the costs of follow-up management, technical assistance or monitoring) is estimated at \$396,048.

§ 92.101	Consortia Applications and Certification		
	Field Office Cost:	2 hours X 12 applications	24 hours
§ 92.501	Investment Partnership Agreement		
	Field Office Cost:	1 hour X 639 agreements	639 hours
§ 92.502	IDIS Program Management Reports		
	Field Office Cost:	14 hours / month X 12 months X 43 Offices	7,224 hours
	Headquarters Cost:	250 hours / month X 12 months	3,000 hours
§ 92.509	Management Reports		
	Field Office Cost:	.5 hour X 639 reports	320 hours
	Headquarters Cost:	.25 hour X 639 reports	160 hours
Total hours			11,367 hours
Total cost to the Federal Government: 11,415 hours at \$42/ hour*			\$477,414
(*This figure is based on GS-13 salary)			

15. Explanation of Program Changes / Adjustments

Any increase in the annual number of responses from the previously approved version is due to an increase in the number of HOME program participants. Corrected, the number needed to be reduced by 25 hours, because we took out a form that had been included.

16. Publication of Results

Not later than 120 days after the end of each fiscal year, the Department is required at Section 284(b) of the Act to report to Congress on the overall progress of program participants in meeting statutory and regulatory provisions of the HOME Program. The report must include a description of the action taken by PJs to establish and oversee minority outreach programs as required by Section 281 of the Act and include an assessment of the fiscal year performance of the program based upon the data identified herein.

17. Display of the Expiration date for OMB Approval of the Information Collection

The Office of Affordable Housing Programs is not seeking to not display the expiration date for OMB approval of the information collection.

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.

