

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

Collection of Information from HUD Lead Hazard Control Grantees Regarding Their Use of Healthy Homes Supplemental Funding

A. Justification

1. Authority for Information Collections

Section 1011 of the Residential Lead-Based Paint Hazard Reduction Act of 1992 (P.L. 102-550), which is Title X of the Housing and Community Development Act of 1992, amended the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4822 *et seq.*) and authorized the Secretary of HUD to provide grants to eligible applicants to evaluate and reduce lead-based paint (LBP) hazards, as defined by EPA (Public Law 102-550, Section 403), in housing that is not federally assisted, federally owned, or public housing. Reducing LBP hazards is but one part of an overarching Healthy Homes program. Healthy Homes programs are authorized under Sections 501 and 502 of the Housing and Urban Development Act of 1970 (12 U.S.C. § 1701z-2) and have been funded through the Department of Housing and Urban Development Appropriations Act, 2009 (Pub. L. 111-8), the Consolidated Appropriations Act, 2010 (P.L. 111-117); the Department of Defense and Full-Year Continuing Appropriations Act, 2011 (Public Law 112-10), and the Department of Housing and Urban Development Appropriations Act, 2012 (Public Law 112-55).

HUD requests an approval of a new one-time collection for information in support of an effort to assess the use of Healthy Homes supplemental funding by Lead Hazard Control grantees. These modest supplements help to increase the effectiveness of the lead hazard control interventions by allowing grantees to address key health and safety hazards for which lead hazard control funds could not be used. HUD's Lead Hazard Control Program grantees that have incorporated healthy homes interventions into their programs have special knowledge and experience that can contribute greatly to the assessment of healthy homes tools and practices that can lead to improved utilization of funding aimed at reducing key health and safety hazards in residential housing. Herein HUD presents and explains paperwork burden estimates for this new collection of information.

2. Requirements

For this request, the following requirements pertain to paperwork burden: *respond to a brief questionnaire regarding the experience of the HUD grantee (or subgrantees working with the grantee) on use of Healthy Homes supplemental funding.* The requirement is described in the following paragraphs.

a. Background. Lead Hazard Control grantees were eligible to receive the following amounts of Healthy Homes supplemental funds in the four fiscal years that the supplemental funds have been offered: \$75,000 per grantee in FY 2009; \$100,000 in FY 2010; \$150,000 in FY 2011, and \$200,000 in FY 2012. In FY 2011 and FY 2012, grantees were required to use the Healthy Homes Rating System (HHRS) to identify the residential hazards to be addressed.

Approximately 80 grantees have received the healthy homes supplement during the period in which the funds have been offered.

b. Questionnaire. HUD has developed a questionnaire for HUD's Lead Hazard Control grantees that received Healthy Homes supplemental funds. It is currently a 19 page questionnaire consisting of 24 questions. The questionnaire will be distributed electronically (please see attached).

3. Methods for Conducting Information Collections

The methods for conducting the required information collections are described below:

a. Implementation of the Questionnaire. Each of the approximately 80 Lead Hazard Control grantees that received Healthy Homes supplemental funds will be contacted and asked to fill out the questionnaire over a reasonable time period (e.g., a 2-week period). The questionnaire and accompanying instructions will be either distributed electronically and returned to HUD via email or posted on a website for completion by the grantee using a key code/password for access sent to each grantee by email. Responses are voluntary. It is likely that it will be necessary to conduct follow-up discussions with some of the respondents in order to clarify answers they provided on the questionnaire, but these will likely be a relatively small subset of the grantees.

The following text is from the 2012 LHC/LHRD NOFA (DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT, Docket No. [FR-5600-N-04], Notice of Funding Availability for HUD's Fiscal Year (FY) 2012 Lead-Based Paint Hazard Control Grant Program and Lead Hazard Reduction Demonstration Grant Program). Similar text was included in the NOFAs published in FY 2009 – 2011.

“e. Cooperation with Related Research and Evaluation. You must cooperate fully with any research or evaluation sponsored by HUD, CDC, EPA or another government agency associated with this grant program, including preservation of project data and records and compiling requested information in formats provided by the researchers, evaluators or HUD. This also may include the compiling of certain relevant local demographic, dwelling unit, and participant data not contemplated in the original proposal. Participant data shall be subject to the Privacy Rule of the Health Insurance Portability and Accountability Act of 1996 (HIPAA). HIPAA and the Privacy Rule can be found at <http://www.hhs.gov/ocr/privacy/>. For the programs in this NOFA, HUD does not expect research to be conducted that could affect human subjects. For any research that could affect human subjects, appropriate disclosure in plain language, alternative formats, and other languages, as appropriate, should be used. To protect the researchers, it is advisable that verbal explanation of all disclosures be video taped.”

4. Nonduplication

To our knowledge there is no duplication of information collection on this subject. None of the information sought in this collection can be obtained from the quarterly status reports that are submitted by the grantees. Grantees have to keep track of total funds expended for HH

Supplement activities, but not the specific interventions conducted on individual homes. Because of the frequency of reporting, the quarterly status reports are designed to reduce the reporting burden of grantees by collecting only essential data.

The detailed questions on home assessment are included because the grantees are currently using a variety of assessment tools. Some grantees are expected to use an assessment tool (i.e., the Healthy Housing Rating System) that was specified in some of the NOFAs, however; HUD is interested in the degree to which grantees have customized the tool to fit their local needs. This information is also not available through quarterly progress reports.

5. Burden on Small Entities

This information collection requirement does not have a significant impact on HUD Lead Hazard Control grantees, which are States or units of local government, or their subgrantees. Further, the information collection requirements are not overly burdensome for this one-time collection. We estimate that the average burden per respondent would be a maximum of 8 hours.

6. Consequences to Federal Program or Policy Activities

If HUD did not conduct the above mentioned information collection, there would be significant data gaps with respect HUD's ability to provide effective Healthy Homes intervention guidance to future grantee recipients of Healthy Homes funds. The guidance that will be informed by this information collection will include suggestions for the most cost effective use of the supplemental funding by Lead Hazard Control Program grantees. In addition, this data gap would hinder the ability of HUD to make decisions regarding the most effective use of its limited Healthy Homes funding.

7. Special Circumstances for Information Collections

There are no special circumstances that would cause the information collection to be conducted in a manner that was contrary to the general information collection guidelines provided by OMB.

8. Public Input on Information Collection Requirements

On September 17, 2012, HUD invited comments from the public through November 16, 2012, 2012 regarding this information collection request (Notice of Proposed Information Collection: Comment Request; *Federal Register*, Volume 77, Number 180, page 57105). No comments were received.

9. Payment or Gifts to Respondents

HUD will make no payments or gifts to respondents.

10. Confidentiality

No assurance of confidentiality is provided, nor is such appropriate or feasible.

11. Collection of Sensitive Information

No questions of a sensitive nature are posed in the information collection.

12. Hour Burden Estimate

HUD has estimated the paperwork hour burden for this collection. This is a one-time collection and asks grantees to compile information that is not routinely reported. The total number of respondents is estimated at 80, the frequency of response is one. The burden is based on the time to complete a brief questionnaire. The hourly labor cost is rated at \$32.75 per hour (2012 OPM rates, GS-12, step 5; www.opm.gov). The hour burden estimates are presented in Table 1 and include any burden from follow-up discussions with some of the grantees.

Table 1. Hour and Cost Burden Estimate

Requirement	No. of respondents	Hours per respondent	Total Hours	Cost per hour	Labor Cost	Startup Cost	O&M Cost	Total Cost
Complete questionnaire	80	8	640	\$32.75	\$20,960	\$0	\$0	\$20,960
Total	80		640		\$20,960	\$0	\$0	\$20,960

Total cost: \$20,960
Total hours: 640
Cost per hour: \$32.75
Total respondents: 80
Hours/Respondent: 8

13. Cost Burden Estimate

As noted above, HUD has estimated the paperwork cost burden. The cost burden estimates are presented in Table 1.

14. Costs to the Federal Government

The estimated cost to the Federal Government to develop and implement the questionnaire and summarize the findings is \$100,000. This is the cost to the federal government for the contract to collect and report on the data.

15. Reasons for Program Changes or Adjustments

Not applicable; this is a new one-time information collection.

16. Publication of Information Collections

No reports based on this information collection will be published. The information will be used to generate improved guidance on the most effective uses of supplemental Healthy Homes

funding by Lead Hazard Control Program grantees and to inform HUD's decision-making process regarding the most effective uses of Healthy Homes Program funds.

17. Display of Expiration Date

HUD will fully comply with the requirement to display a valid OMB control number for this information collection.

18. Exceptions to the Certification Statement

HUD expects to fully comply with the Certification for Paperwork Reduction Act Submissions (OMB 83-i).

B. Collections of Information Employing Statistical Methods

This collection will not use statistical methods to reduce the burden on the target population. Rather, the entire population of HUD's grantees receiving Healthy Homes Supplemental funding will be asked to respond to the questionnaire. Use of statistical methods to reduce the burden is unnecessary for three reasons: 1) The individual grantee and overall burdens are low; 2) the population of current grantees is relatively small, and 3) the grantees are required to participate in HUD-sponsored program evaluations. HUD estimates that there are about 80 current grantees, and that a small number (about 15 percent) of grantees will not respond.

Therefore Part B of the ICR Supporting Statement does not apply to this information collection. All grantees receiving Healthy Homes Supplemental funding will be asked to respond to the questionnaire and no statistical sampling will be used.