
19. Certification for Paperwork Reduction Act Submissions

On behalf of this Federal Agency, 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.

| | |
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| Signature of Program Official: x Danielle Bastarache, Acting Deputy Assistant Secretary Office of Policy, Program and Legislative Initiatives, OPPLI | Date: |
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| Signature of Senior Officer or Designee: Colette Pollard, Departmental Reports Management Officer Office of Investment Strategies, Policy, and Management, Office of the Chief Information Officer | Date: |
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SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS Jobs Plus Grant Competition and Program Administration

A. Justification

1. This request is for a new information collection for use in HUD's competitive Jobs Plus Grant Competition and Program Administration. The information collected during the Jobs Plus Grant Competition is not expected to frequently change; therefore, HUD will only need to seek OMB approval every three years, as required by the Paperwork Reduction Act.

The Public and Indian Housing Office of Public Housing Investments is responsible for administration of the Department's new Jobs Plus Pilot Initiative authorized by Title II of the Consolidated Appropriations Act of 2014, H.R. 3547, under the Public Housing Capital Fund account.

The purpose of a Jobs Plus program is to develop locally-based approaches such as work readiness, educational advancement and financial counseling in order to increase earnings and advance employment outcomes among public housing residents. The goal of the program is to provide intensive employment services for residents of public housing in order to eliminate persistent poverty. Programs will be designed to provide work incentives, to implement employment training, placement and retention strategies, and to promote community or neighbor-to-neighbor support for work opportunities among public housing residents. Primary applicants will be Public Housing Agencies (PHAs) working in tandem with key partners including local Workforce Investment Boards (WIBs) and the One-Stop Career Centers or American Job Centers they oversee, in addition to other partnering organizations that provide supportive services to public housing residents enrolled in Jobs Plus.

The Department will publish a Notice of Funding Availability (NOFA) which will contain the application submission requirements and selection criteria for awarding Jobs Plus grants and specific requirements that will apply to selected grantees. This is expected to be a traditional grant competition that may involve the rating and ranking of applications on standard and/or specialized rating criteria such as applicant capacity and experience in administering employment and training or similar programs, need or extent of the problem, quality of program or soundness of approach, leveraging of partnerships and/or other resources, and achieving results and program assessment. The NOFA may also include information on required reporting for successful applicants. Eligible applicants interested in obtaining Jobs Plus grants will be required to submit applications to HUD. The application includes the submission requirements described in more detail below and the information needed from partnering organizations such local government entities, housing authorities, employment and training agencies, workforce investment boards, TANF agencies, or nonprofits. The information provided demonstrates the applicants' plans to implement the initiative requirements, which includes the capacity of lead applicant and partners. The information will be used by federal agency staff to evaluate threshold requirements and rate and rank applications every year the Jobs Plus grant program is funded.

2. Jobs Plus Pilot Information Collection

- a. **Grant Application Narrative and Forms Submitted in Response to Notice of Funding Availability (NOFAs)**
- b. **Post Award Submissions**
- c. **Grants Management**
- d. **Program Monitoring**

HUD expects to receive upwards of 125 applications based on specific eligibility criteria for submitting an application as described in the NOFA. For the initial program year, eligible applicants will be limited to PHAs that meet specific criteria for size and characteristics of certain public housing developments.

a. **Narrative and Forms** - Each PHA will submit a narrative program proposal and a description of how the program and agency meet HUD's selection criteria, in addition to providing an agency budget and standard and program specific forms identified below.

1. **Form SF-424, Application for Federal Assistance.** This is a once a year submission for agencies requesting grant funding.
2. **Form HUD 424 CB, Grant Application Detailed Budget** This is a once a year submission for agencies requesting grant funding (2501-0017).
3. **Modified Jobs Plus Summary Budget.** A form will be developed with categories and format to best meet the needs of Jobs Plus.
4. **Form HUD 424 CBW-I.** HUD is evaluating whether to require applicants to submit 424-CB and 424-CBW forms and worksheets to supplement the applicant's own program budget submissions.
5. **Form SF-LLL, Disclosure of Lobbying Activities.** Once a year submission for agencies requesting grant funding.
6. **Form HUD-2880, Applicant/Recipient Disclosure Update Report.** Once a year submission for agencies requesting grant funding (2510-0011).
7. **Form HUD-2991, Certification of Consistency with Consolidated Plan.** Once a year submission for agencies requesting grant funding.
8. **Form HUD-2993, Acknowledgement of Application Receipt.** This is a once a year submission for agencies requesting grant funding via paper applications.
9. **HUD-96011, Facsimile Transmittal.** Once a year submission for agencies requesting grant funding.

In addition to the previously mentioned forms, the Jobs Plus NOFA requires a qualitative narrative for each of the rating factors in the NOFA as identified below.

Rating Factor 1 – Capacity of the Applicant and Experience in Administering Employment and Training or Similar Programs

Rating Factor 2 – Need / Extent of the Problem

Rating Factor 3 – Soundness of Approach or Quality of Program

Rating Factor 4 – Leveraging of Partnerships and/or Other Resources

b. Grant Management - Each PHA will submit performance reports for their programs.

1. **Performance Reports:** HUD is evaluating the appropriate format and frequency of submission for interim and final performance reports.
2. **Form SF-425, Federal Financial Report** – HUD is evaluating the appropriate frequency of submission, whether quarterly, semi-annually, or annually.

c. Forms for Monitoring Grantees

HUD is considering best methods for monitoring grantee performance after awards are made and may develop on-site monitoring and/or performance forms or formats for future implementation.

2. This is a new collection. The information provided to HUD by the eligible applicants will be reviewed and evaluated by HUD. The information to be collected by HUD will be used to preliminarily rate applications, to determine eligibility for the Jobs Plus Grant Competition and to establish grant amounts. The Jobs Plus Grant Competition Application will be used to determine funding recipients. HUD is considering best methods for monitoring grantee performance after awards are made and may develop monitoring forms or formats for future implementation.
3. All applicants, unless granted a waiver, must submit grant applications electronically to HUD via the www.grants.gov web site. This does not necessarily reduce the reporting burden as the information required for submission is the same as that required when paper applications were submitted. However, the forms used to collect this information have been converted to an electronic format which may make it easier for applicants to use and less burdensome to submit.
4. To avoid duplication of information, the application has been streamlined, with each data element collected only once, stored in a database, and placed in all appropriate sections of the application. Without the information gathered in these forms, the Department would not be able to fully evaluate applicants' capacity to run an effective program and administer federal funds.
5. Efforts were made to minimize the burden placed on all applicants, while at the same time ensuring that sufficient information would be provided to allow HUD to determine and select the best proposals.
6. All information collected is used to carefully consider applications for funding; if HUD collects less information, or collected it less frequently, the Department could not determine the eligibility of applicants for grant funds and applicants would not be eligible to receive funding for that fiscal year.
7. There are no special circumstances that would cause these information collections to be conducted inappropriately.

8. HUD published a Notice of Proposed Information Collection for Public Comments in the *Federal Register*, Volume 79; No., 106, Page 31963, on June 3, 2014. The public was given until August 4, 2014, to submit comments on the proposed information collection. HUD received no comments on this proposed collection.
9. No payments or gifts are provided to respondents for any of these information collections.
10. Assurance of confidentiality is neither provided nor needed for any of these information collections.
11. No sensitive questions are being asked for any of these information collections.
12. The following chart outlines the burden to respondents associated with the various aspects of the Jobs Plus grant program and a breakout of the forms associated with each portion of that burden. Jobs Plus burden hours per response total 90 hours. The total burden hours is estimated at 8,959 hours.

| Information Collection | Number of Respondents | Responses per Year | Total Annual Responses | Estimated Burden Hours per Response | Total Hours | Hourly Cost | Annual Cost |
|---|-----------------------|--------------------|------------------------|-------------------------------------|--------------|----------------|------------------|
| GRANT APPLICATIONS | | | | | | | |
| Abstract/Executive Summary | 125 | 1 | 125 | 3 | 375 | \$35.22 | \$13,208 |
| HUD-96011 Facsimile Transmittal | 125 | 1 | 125 | 0.5 | 62.5 | \$35.22 | \$2,201 |
| SF-424 Application for Federal Assistance (2501-0017) | 125 | 1 | 125 | 0.75 | 93.75 | \$35.22 | \$3,302 |
| HUD-424 CB (2501-0017) – Grant Application Detailed Budget (optional) | 60 | 1 | 60 | 2.6 | 156 | \$35.22 | \$5,494 |
| HUD-424 CBW Grant Application Detailed Budget Worksheet (2501-0017) (optional) | 60 | 1 | 60 | 3.2 | 192 | \$35.22 | \$6,762 |
| HUD-424 CBW-I (2501-0017) - Instructions for Grant Application Detailed Budget adapted for Jobs Plus (optional) | 60 | 1 | 60 | 1 | 60 | \$35.22 | \$2,113 |
| SF-LLL- Lobbying (0348-0046) | 125 | 1 | 125 | 0.17 | 21.25 | \$35.22 | \$748 |
| HUD-2880 Applicant Disclosure (2510-0011) | 125 | 1 | 125 | 2 | 2 | \$35.22 | \$70 |
| HUD-2991 Certification of Consistency with Consolidated Plan (2506-0112) | 125 | 1 | 125 | 0.17 | 21.25 | \$35.22 | \$748 |
| HUD- 2993 Acknowledgement of Application Receipt (2577-0259) | 1 | 1 | 1 | 0.5 | 0.5 | \$35.22 | \$18 |
| Rating Factor 1 – Capacity | 125 | 1 | 125 | 14 | 1750 | \$35.22 | \$61,635 |
| Rating Factor 2 – Need | 125 | 1 | 125 | 7 | 875 | \$35.22 | \$30,818 |
| Rating Factor 3 – Soundness of Approach | 125 | 1 | 125 | 18 | 2250 | \$35.22 | \$79,245 |
| Applicant's Detailed Program Budget | 65 | 1 | 65 | 2.6 | 169 | \$35.22 | \$5,952 |
| Form HUD-50144 - Summary Jobs Plus Budget | 65 | 1 | 65 | 1.2 | 78 | \$35.22 | \$2,747 |
| Narrative to Program Budget | 65 | 1 | 65 | 3.2 | 208 | \$35.22 | \$7,326 |
| Rating Factor 4 – Match/Leveraging Table | 125 | 1 | 125 | 7 | 875 | \$35.22 | \$30,818 |
| <i>Sub-Total Application Submission w/Narratives</i> | 125 | 1 | 125 | 66.89 | 7189.25 | \$35.22 | \$253,205 |
| POST AWARD SUBMISSIONS | | | | | 0 | | \$0 |
| Code of Conduct (if not on HUD website, if recently updated, if not previously submitted) | 30 | 1 | 30 | 1 | 30 | \$35.22 | \$1,057 |
| <i>Sub-Total – Post-Award</i> | 30 | | 30 | 1 | 30 | \$35.22 | \$1,057 |
| GRANT MANAGEMENT | | | | | 0 | | \$0 |
| Quarterly/Semi-Annual Performance Reports | 30 | 4 | 120 | 8 | 960 | \$35.22 | \$33,811 |
| SF-425 Federal Financial Report (0348-0061) | 30 | 4 | 120 | 4 | 480 | \$35.22 | \$16,906 |
| <i>Sub-Total – Grant Management</i> | 30 | 4 | 120 | 12 | 1440 | \$35.22 | \$50,717 |
| PROGRAM MONITORING | | | | | 0 | | \$0 |
| Monitoring and Reporting | 30 | 1 | 30 | 10 | 300 | \$35.22 | \$10,566 |
| <i>Sub-Total – Monitoring</i> | 30 | 1 | 30 | 10 | 300 | \$35.22 | \$10,566 |
| Grand Totals | 125 | 4 | 125 | 90 | 8,959 | \$35.22 | \$315,545 |

Note: The estimated hourly cost, applied when the burden cost relates to a PHA, is an estimated median hourly salary of a PHA Project Manager or other professional/managerial staff preparing grant applications.

13. There are no start-up or additional costs to the respondents other than those reported in Item 12 above in the Burden Cost Column. A median wage for a Project Director was used for these collections, at \$35.22 per hour.

14. The primary costs to the Federal Government involve the review and processing of applications, making of awards, and monitoring of grants. The review of applications will take place in HUD Headquarters. Monitoring is expected to be a joint effort between Headquarters and Field Office staff. The estimated annualized cost to the Federal Government is based on various hourly rates indicated in the 2014 General Pay Scale for GS-12 through GS-14 level personnel, which represents Grant Administrators and other positions within the Office of Public Housing and Public Housing

Investments that will fund the grants administer the program. The estimated total cost to the Federal Government is \$384,499.

| Position | | # | FTE/Staff Hours | X | Hourly Rate | = | Annualized Cost |
|------------------------------------|-------|----|-----------------|---|-------------|---|-----------------|
| Executive | GS-15 | 1 | 160 | | \$67.88 | | \$ 10,860.80 |
| Administrator/Team Leader | GS-14 | 1 | 480 | | \$57.70 | | \$ 27,696.00 |
| Application Reviewers | GS-13 | 10 | 120 | | \$48.83 | | \$ 58,596.00 |
| MIS/Administrative Staff | GS-13 | 2 | 240 | | \$48.83 | | \$ 23,438.40 |
| Budget/Financial Staff | GS-13 | 1 | 24 | | \$48.83 | | \$ 1,171.92 |
| Congressional/Public Affairs Staff | GS-13 | 1 | 16 | | \$48.83 | | \$ 781.28 |
| Field Office Staff | GS-12 | 8 | 16 | | \$41.07 | | \$ 5,256.96 |
| TOTAL | | | | | | | \$ 127,801.36 |
| | | | | | | | |
| Position | | # | FTE/Staff Hours | X | Hourly Rate | = | Annualized Cost |
| Executive | GS-15 | 1 | 208 | | \$67.88 | | \$ 14,119.04 |
| Grant Administrator | GS-14 | 1 | 1040 | | \$57.70 | | \$ 60,008.00 |
| GS-13 Technical Staff | GS-13 | 1 | 240 | | \$48.83 | | \$ 11,719.20 |
| Field Office Staff | GS-12 | 16 | 260 | | \$41.07 | | \$ 170,851.20 |
| TOTAL | | | | | | | \$ 256,697.44 |
| | | | | | | | \$ 384,498.80 |

15. This is a new collection.

16. The results of this collection of information will not be published for statistical use.

17. No approval is sought to not display the expiration date for OMB approval of the information collection.

18. No exceptions.

B. Collection of Information Employing Statistical Methods

This information will not be collected using statistical methods.