

Supporting Statement for Paperwork Reduction Act Submissions
Energy Innovation Fund – Multifamily Pilot Program
OMB Control Number 2502-0599

A. Justification

1. Circumstances that make the collection of information necessary:

The primary purpose of the Program is to implement the provisions of the “Consolidated Appropriations Act of 2010” which authorizes HUD to create a grant program to stimulate innovative approaches for increasing the energy efficiency of existing multifamily residential properties that can be replicated by others. Awards were made in each of two different categories: a. Financing Demonstrations, and b. Applied Research Demonstrations. A Notice of Funding Availability (NOFA), number was published on Grants.gov.

2. How, by whom, and for what purpose the information will be used:

The information is being collected will contain the following items:

- a. **Work Plan.** A proposed Work Plan as described in the NOFA must be submitted by the applicant with its application. HUD will approve the Final Work Plan and it will be incorporated into the Grant Documents. For those grantees who have had the term of their grant extended, a supplemental Final Work Plan must be submitted.
 - b. **Quarterly Reports.** Quarterly reports are to be submitted to inform HUD on progress on each grantee’s grant.
 - c. **Final Report.** Each grantee will submit a Final Report of activities conducted under the grant.
3. **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:**

There is no electronic collection.

Grantees have acquired rights and access under HUD’s Electronic Line of Credit Control System (eLOCCS). This is the sole mechanism for obtaining grant funds. Grantees are required to have HUD approval before making any withdrawal of grant funds from the eLOCCS system.

4. Describe efforts to identify duplication. The program is a pilot with new requirements for application submission, grant award, and reporting. It is anticipated that most items will only be required once for each applicant. A supplemental Work Plan will be required once for the extension period (12 months) and there will be Quarterly Reports during that time period. At the end of the grant period, including extensions, each Grantee will be required to file a Final Report.
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 Department minimizes the burden on small businesses by requiring the collection of information only once whenever possible.
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. This is a new pilot program seeking innovative proposals for increasing the energy efficiency of Multifamily Housing. The application package uses standard OPM and HUD forms to the extent possible. No other existing forms can be substituted to obtain the required information for proposals included in the application. The collection of grant information occurs only once for each grant award. The Department could not comply with the
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provisions of the law and Federal regulations if the collection were eliminated.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5CFR 1320.8(d): There are no special circumstances that apply to this information collection.
8. 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 5 CFR 1320.8(d), this information collection soliciting public comments was announced in the *Federal Register* on December 5, 2014, Volume 79, No. 234, Pages 72194. No comments were received.

HUD has consulted extensively with persons outside the agency with regard to this pilot program. The following people, representing stakeholders from the multifamily industry, are among the non-governmental entities consulted:

Jeanne Engel, consultant, former Clinton Foundation and FHA
David Abromowitz, Goulston and Storrs
Tom Amdur, National Housing and Redevelopment Association
Sharon Dworkin Bell, National Association of Homebuilders
Lisa Blackwell, National Multi Housing Council
Lane Burt, Natural Resources Defense Council
Heather Clark, Winn Development
Anne Evans, Center for Neighborhood Technologies
Jonathan Goldstein, Sunwheel Energy
Dick Jones, Boston Community Capital
Bill Kelly, Stewards of Affordable Housing for the Future
Mike Lappin, Community Preservation Corporation
Chuck Laven, Forsyth Street Advisors
Dan Mendelson, Consultant
Denise Muha, National Multi Housing Council
Jeff Perlman, Bright Power
Roger Platt, US Green Building Council
Jonathan Rose, Jonathan Rose Companies
Bruce Schlein, Citi
Julieann Summerford, Heschong Mahone Group
Paul Weech, Housing Partnership Network
Catherine Merschel, Build it Green
Kim Latimer, LIIF
Cary Hirschstein, HR&A Advisors, Inc.
Margot Brandenburg, Rockefeller Foundation
Kelly Caffarelli, Home Depot Foundation
Lois DeBacker, Kresge Foundation
Sam Marks, Deutsche Bank Americas Foundation
Debra Schwartz, Macarthur Foundation

HUD has also consulted with other Federal governmental entities, among them the Treasury Department and the Environmental Protection Agency.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees. No gifts or payments are provided to respondents.
10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. The applicants have not been given any assurance of confidentiality beyond what is available under the OPM and HUD forms submitted as part of the application. The NOFA specifically states that, because the replicability of proposed solutions is a desired outcome of the Energy Innovation Program, HUD has not awarded grants to an applicant who proposes a proprietary solution. This prohibition on award includes proposing to use as a platform or create after development, a tool, system or methodology that is proprietary to the Grantee or any third party, or that relies on protected intellectual property. The use of widely available technical systems (e.g. ACCESS or EXCEL) is generally permitted.
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. No questions of a sensitive nature apply.
12. Provide estimates of the hour burden of the collection of information.
13. Provide an estimate of the annual cost burden to respondents. Based on the assumption that clerical staff and professional/supervisory staff will share this burden. HUD estimates the applicable hourly rate will be \$25

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Supp. Work Plan	12	1	12	25	300	\$ 625.00	\$ 7,500.00
Cooperative Agreement (Amended)	12	1	12	1	12	\$ 25.00	\$ 300.00
Quarterly reports	12	4	48	2	96	\$ 50.00	\$ 2,400.00
Final report	12	1	12	4	48	\$ 100.00	\$ 1200.00
Section 3 reporting	12	4	48	1	48	\$ 25.00	\$ 1200.00
Totals	60		132		504		\$12,600.00

Cooperative Agreement and Final Report:

There are 12 respondents who will submit a standard form Final Report. The Cooperative Agreement for each respondent will remain in effect in accordance with the terms of that Agreement

Reporting requirements:

The number of respondents is 12 as awards were made to 12 Grantees

14. Provide estimates of annualized costs to the Federal government. Costs are based on an hourly rate of \$50.41, representing the pay rate of a GS-14, step-1. There are no operational expenses.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Supp. Work Plan	12	1	12	15	180	\$ 756.15	\$ 9,073.80
Cooperative Agreement (Amended)	12	1	12	1	12	\$ 25.00	\$ 300.00
Quarterly reports	12	4	48	15	720	\$ 756.15	\$ 36,295.20
Final report	12	1	12	15	180	\$ 756.15	\$ 9,073.80
Section 3 reporting	12	4	48	10	480	\$ 504.10	\$ 24,196.80
Totals	60		156		1572		\$78,939.60

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

This is a revision of a currently approved collection. The program is in its final stage and no longer requires burden reporting for application processing. As a result, burden has decreased.

16. For collections of information whose results will be published, outline plans for tabulation and publication. The results of this collection may be published if it is determined that data on the costs, benefits, challenges, and opportunities associated with retrofitting such properties will be useful to others and approaches for retrofitting such properties can be scaled up, applied more widely and adopted by other parties.

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. The OMB expiration dates will be displayed on the appropriate forms.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I. There are no exceptions to the Certification Statement identified in item 19 of the OMB 83-I.

B. Collection of Information Employing Statistical Methods.

This collection of information does not employ statistical methods.