

# Paperwork Reduction Act Submission

Please read the instruction before completing this form. For additional forms or assistance in completing this forms, contact your agency's Paperwork Reduction Officer. Send two copies of this form, the collection instrument to be reviewed, the Supporting Statement, and any additional documentation to: Office of Information and Regulatory Affairs, Office of Management and Budget, Docket Library, Room 10102, 725 Seventeenth St. NW, Washington, DC 20503.

1. Agency/Subagency Originating Request: U.S. Department of Housing and Urban Development	2. OMB Control Number: a. 2577-NEW b. <input type="checkbox"/> None
--	---

3. Type of information collection: (check one)  a. <input checked="" type="checkbox"/> New Collection b. Revision of a currently approved collection c. Extension of a currently approved collection d. Reinstatement, <b>without change</b> , of previously approved collection for which approval has expired e. <input type="checkbox"/> Reinstatement, <b>with change</b> , of previously approved collection for which approval has expired f. <input type="checkbox"/> Existing collection in use without an OMB control number  For b-f, note item A2 of Supporting Statement instructions.	4. Type of review requested: (check one) a. <input checked="" type="checkbox"/> Regular b. <input type="checkbox"/> Emergency - Approval requested by c. <input type="checkbox"/> Delegated  5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities? Yes    No <input checked="" type="checkbox"/>  6. Requested expiration date: a. <input checked="" type="checkbox"/> Three years from approval date    b. <input type="checkbox"/> Other (specify)
---	---

7. **Title:** Juvenile Reentry Assistance Program (JRAP)  
 8. Agency form number(s): SF424; SF425; HUD2991; HUD96011; HUD96010; HUD27061  
 9. **Keywords:** Housing, Public Housing, Expungement, Re-Entry, Sealing Records, Criminal Records

10. Abstract: Criminal Records affect an individual's ability to obtain academic degrees, find work, and secure affordable housing. Re-entry strategies too often do not include legal services and the legal aid community often lacks resources to independently address expungement and collateral consequences. As a response, the Department of Housing and Urban Development (HUD) and the Department of Justice (DOJ) are joining forces to expand the opportunities of those with convictions. This therefore enables those with criminal records to overcome chief collateral consequences such as, barriers to housing, education, employment, health care, and insurance as well as serious immigration consequences. The aforementioned are chief among the tangible collateral consequence.

11. Affected public: (mark primary with "P" and all others that apply with "X") a. <input checked="" type="checkbox"/> Individuals or households    e. Farms b. Business or other for-profit    f. Federal Government c. Not-for-profit institutions    g. <input checked="" type="checkbox"/> State, Local or Tribal Government	12. Obligation to respond: (mark primary with "P" and all others that apply with "X") a. Voluntary b. <input checked="" type="checkbox"/> Required to obtain or retain benefits c. <input checked="" type="checkbox"/> Mandatory
---	---

13. Annual reporting and recordkeeping hour burden: a. Number of respondents: 200 b. Total annual responses: 200 Percentage of these responses collected electronically: 100% c. Total annual hours requested: 33,023 d. Current OMB inventory e. Difference (+,-) f. Explanation of difference: 1. Program change: 2. Adjustment:	14. Annual reporting and recordkeeping cost burden: (in thousands of dollars) a. Total annualized capital/startup costs 0 b. Total annual costs (O&M) 0 c. Total annualized cost requested 0 d. Total annual cost requested 0 e. Current OMB inventory 0 f. Explanation of difference: 1. Program change: 2. Adjustment:
---	--

15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X") a. <input checked="" type="checkbox"/> Application for benefits    e. <input checked="" type="checkbox"/> Program planning or management b. <input checked="" type="checkbox"/> Program evaluation    f. Research c. General purpose statistics    g. <input checked="" type="checkbox"/> Regulatory or compliance d. Audit	16. Frequency of recordkeeping or reporting: (check all that apply) a. <input type="checkbox"/> Recordkeeping    b. Third party disclosure b. <input checked="" type="checkbox"/> Reporting: 1. <input checked="" type="checkbox"/> On occasion    2. <input type="checkbox"/> Weekly    3. <input type="checkbox"/> Monthly 4. <input checked="" type="checkbox"/> Quarterly    5. <input type="checkbox"/> Semi-annually    6. <input checked="" type="checkbox"/> Annually 7. <input type="checkbox"/> Biannually    8. <input type="checkbox"/> Other (describe)
---	---

17. Statistical methods: Does this information collection employ statistical methods? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	18. Agency contact: (person who can best answer questions regarding the content of this submission) Name: Ronald Ashford Phone: 202-402-4258
---	--

---

## 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.

Signature of Program Official:  X Dominique Blom, Deputy Assistant Secretary, Office of Public Housing Investment, OPHI	Date:
Signature of Senior Officer or Designee:  X Colette Pollard, Departmental Reports Management Officer Office of Chief Information Officer	Date:

# Supporting Statement for Paperwork Reduction Act Submissions

## A. Justification

1. **Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Pursuant to 42 U.S.C. §1437Z-6; 42 U.S.C. §5614(e); 28 U.S.C. §530c; 12 U.S.C. §1701z-2(f), HUD has the authority to grant funding for the Juvenile Reentry Assistance Program (JRAP). The collection of information is necessary to allow for JRAP to be implemented. The collection improves administrative oversight in the process, allows for recipients to be evaluated, and allows for the proper recipients to implement the federal government initiative. Additionally, the Government Paperwork Elimination Act (P.L. 105-277, Title XVII) requires federal agencies to provide for the electronic submission of forms and information from the public whenever practicable, including accepting electronic signatures or alternatives and ensuring proper security. Here, the electronic submission of this information collection is practicable and necessary to select applicants for JRAP.

The Department will publish a Notice of Funding Availability (NOFA) which will contain the application submission requirements and selection criteria for awarding JRAP grants and specific requirements that will apply to selected grantees. This is expected to be a traditional grant competition and would rate and rank applications based on budget, capacity/experience, need, soundness of approach, and performance measures. The NOFA may also include information on required reporting for successful applicants. Eligible applicants interested in obtaining JRAP grants will be required to submit applications to HUD. The application includes the submission of the information needed from partnering organizations such as legal aid organizations, University Legal Centers, and Community Based Organizations. 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 JRAP grant program is funded.

2. **Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The Department of Housing and Urban Development will use the collection of information to evaluate the recipient(s) and to select the recipient(s) who will best implement JRAP.

- ▶ The information will be collected electronically. Exceptions will be made for those who need to submit paper versions.
- ▶ The information will be collected by HUD (Office of Supportive Services, PIH).
- ▶ We expect to receive 2-4 submission per week. We will also be collecting evaluation information after the PHAs and its partners have instituted the program.
- ▶ The initial information being collected will be used to select eligible grantees for the grant award. Subsequent information regarding success of the program will be collected from the PHAs and its partners to evaluate the results of the program.

3. **Describe 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, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

**The Department of Housing and Urban Development is requiring responses for JRAP be submitted electronically through the Grants.gov electronic portal. Applicants that cannot submit their applications electronically may seek a waiver of the electronic submission requirement from HUD, but they must show good cause and must be approved by HUD for the waiver. This means of submission was adopted because:**

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities and entities with limited resources;
- (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.

4. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The Department of Housing and Urban Development has made efforts to prevent duplication. This method saves time and resources. Other methods of submission for this funding opportunity are not environmentally friendly, and do not alleviate the filing burden on applicants.

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 information collection does affect small entities and small organizations with limited resources. The electronic collection of information impacts eligible applicants by alleviating their filing burden by requiring less time for submittal and fewer resources. In contrast, the collection of information in a paper format would burden all applicants whom are eligible. Our applicants- Public Housing Agencies partnering with University Legal Centers, Legal Aid Societies and Community-based Organizations which have limited resources, will be able to utilize their resources most

efficiently and effectively by filing their application through an electronic submission system. Exceptions will be made for those who need to submit paper versions.

**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.**

If the information is not collected, JRAP grants would not be provided; expungements and better access to housing will not be implemented; the designated community would not be served. Additionally, unless the information is collected as frequently as indicated, we will not be able to select the most eligible applicants for the awards and will not be able to properly ensure the progress and success of the program.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**
- requiring respondents to report information to the agency more than quarterly;
  - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
  - requiring respondents to submit more than an original and two copies 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;
  - in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;
  - requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
  - 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; or
  - requiring respondents to submit proprietary trade secret, 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.

There are no special circumstances that would cause information collection to be conducted in a manner as described above.

- 8. If applicable, 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.**

HUD published a Notice of Proposed Information Collection for Public Comments in the *Federal Register*, Volume 79; No. 250; Page 78897, on December 31, 2014. The public was given until March 2, 2015, to submit comments on the proposed information collection. HUD received no comments on this proposed collection.

- 9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

Not applicable to this information collection requirement.

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

All information provided as part of the application will be held strictly confidential and will only be seen by employees of HUD and DOJ who will be reviewing the documents. All application review procedures will be in compliance with: 1) the Privacy Act of 1974 (5 USC 552a), which regulates the federal government's collection, maintenance, use, and dissemination of information about individuals; and 2) The E-Government Act of 2002 (44 USC 36), which establishes procedures to ensure the privacy of personal information in electronic records.

- 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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

Not applicable to this information collection requirement.

- 12. Provide estimates of the hour burden of the collection of information. The statement should:**

- indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally estimates should not include burden hours for customary and usual business practices;
- if this request covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I; and
- provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

The chart below outlines the burden associated with the various aspects of the JRAP program, and a breakout of the forms associated with each portion of that burden. For JRAP applications, the number of burden hours per response is 163.5. When the individual annual burden hours are added together, the total number of annual burden hours is 32,700. For JRAP program reporting/recordkeeping, the number of burden hours per response is 7. When the individual annual burden hours are added together, the total number of annual burden hours is 323. We assume JRAP applications will be prepared by individuals who earn a salary that is approximately equivalent to a GS-13. Per the following website, the hourly rate of a GS-13 attorney is \$51.48 (rounded to \$51) per the following website [www.opm.gov/oca/10tables/html/RUS.asp](http://www.opm.gov/oca/10tables/html/RUS.asp). Based on an hourly rate of \$51, the total annual cost to respondents is estimated to be \$1,684,173 (\$1,667,700 for applications plus \$16,473 for program reporting/recordkeeping).

Information Collection	Number of Respondents	Frequency of Response	Responses per annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
SF-424 Application for Federal Assistance	200	1	200	0.5	100	\$26	\$ 5,100
SF 425 Federal Financial Report	200	1	200	1	200	\$51	\$ 10,200
HUD 96011 - Facsimile Transmittal (OMB No. 2535-0118)	200	1	200	1	200	\$51	\$ 10,200
Juv. Reentry Assistance application - Narrative (Strategy, Approach, Match, Budget, etc.)	200	1	200	80	16,000	\$4,080	\$ 816,000
HUD 96010 - Logic Model (OMB No. 2535-0114)	200	1	200	40	8,000	\$2,040	\$ 408,000
HUD 2991 (Certification of Consistency with the Consolidated Plan) (OMB No. 2506-0112))	200	1	200	1	200	\$51	\$ 10,200
Partnership agreement between PHA and partner	200	1	200	40	8,000	\$2,040	\$ 408,000
<i>Subtotal Application:</i>			<b>200</b>	<b>163.5</b>	<b>32,700</b>	<b>\$8,339</b>	<b>\$1,667,700</b>
HUD-1044 - Grant Agreement	17	1	17	1	17	\$51	\$ 867
Quarterly performance report (narrative and data)	17	4	68	4	272	\$204	\$ 13,872
HUD 27061 Race and Ethnic Data	17	1	17	2	34	\$102	\$ 1,734
<i>Subtotal Program Reporting/Recordkeeping:</i>			<b>102</b>	<b>7</b>	<b>323</b>	<b>\$357</b>	<b>\$16,473</b>
<b>Total Burden</b>			<b>302</b>	<b>170.5</b>	<b>33,023</b>	<b>\$8,696</b>	<b>\$1,684,173</b>

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information (do not include the cost of any hour burden shown in Items 12 and 14).
- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;
  - If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
  - generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Not applicable to this information collection requirement.

- 14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

All Re-entry NOFA documents are reviewed by staff at the Headquarters HUD Office. The salary grade levels of the staff reviewing the applications range from a GS-11 to a GS-15. Therefore, the grade of a GS-13 is used as an average. Per the following website, the hourly rate of a GS-13 attorney is \$ 51.48 (rounded to \$51) per the following website [www.opm.gov/oca/10tables/html/RUS.asp](http://www.opm.gov/oca/10tables/html/RUS.asp).

Based on an hourly rate of \$51, the labor cost will be approximately \$102 for review of each application. Total estimated annualized cost to the Federal Government is \$20,400 based on 2 hour processing time at \$51 per hour for 200 responses.

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

Not applicable to this information collection requirement.

- 16. For collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Not applicable to this information collection requirement.

- 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.**

Not applicable to this information collection requirement.

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

Not applicable to this information collection requirement.

**B. Collections of Information Employing Statistical Methods**