

Department of Housing and Urban Development
Assessment of Technology Needs in HUD Subsidized Housing
Supporting Statement for Notice of Emergency Information Collection and Request for
Comment Published on May 15, 2015 under Docket No. FR-5830-N-02

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

This emergency request was made by HUD because private sector internet service providers contacted HUD about their interest in helping individuals and families residing in HUD-subsidized housing have access to the internet. The internet service providers would install internet access at no cost and therefore help narrow the digital divide for low-income families. The internet service providers sought HUD's help in identifying HUD housing located in communities in which the communities were also committed to helping narrow the digital divide.

To accept the generous offer of these internet service providers, on April 3, 2015, at 80 FR 18248, HUD published in the Federal Register an "Advance Notice of Digital Opportunity Demonstration," by which HUD sought comment on a demonstration designed to test the effectiveness of collaborative efforts by government, industry, and nonprofit organizations to accelerate broadband adoption and use in HUD-assisted homes. By statute, section 470 of the Housing and Urban-Rural Recovery Act of 1983 (42 U.S.C. 3542), HUD may not begin a demonstration program that is not expressly authorized by statute until a description of the demonstration program is published in the Federal Register and a 60-day period expires following the date of publication, and during which HUD solicits public comment and considers the comments submitted.

In using this authority to conduct demonstrations not expressly authorized by statute, HUD generally provides, although it is not required to do so, the full 60-day period to solicit public comment. This means, however that a demonstration will not begin on the 61st day but would begin sometime after consideration of the public comments submitted. In this case, because of the narrow window which HUD believes has been provided to accept the offer of the internet service providers, HUD solicited comment only for a period of 30-days so that it would be prepared to implement the demonstration as soon as possible after the 60-day period has expired. Although HUD provided only a 30-day comment period, communities interested in the demonstration were provided the full 60-day period to submit an express of interest in participating the demonstration.

The information collection proposed in HUD's May 15, 2015, Federal Register notice would help assess the technology needs of those providers that administer HUD-subsidized housing that submitted an expression of interest in participating in HUD's demonstration. Such collection is necessary to assure that the housing selected was not based on any arbitrary decision, but was based on analysis of information which housing providers themselves submitted with respect to their technology needs and the

support that they have from their communities.

2. Purpose and Use of the Information Collection

The information that HUD seeks through this collection is that which would aid HUD in determining that interested communities meet the criteria that HUD set out in its April 3, 2015, Federal Register notice.

As provided in the April 3, 2015, notice, HUD's goal is to identify a sample of communities from urban and rural locations that possess both small and large populations and have the capacity to effectively and expediently implement the demonstration for students housed with HUD assistance. HUD seeks participation by communities where local leadership has already taken steps to support the goals of the demonstration, as measured by both the community's participation in other complementary Federal initiatives enhancing Internet access in communities, as well as local broadband plans and strategies for implementation. Participation in the demonstration by these communities will build upon existing efforts already underway to expand Internet access, thereby building the comprehensive community-school-home synergy that is a primary goal of the demonstration.

The specific criteria that HUD advised it will use to assess communities that expressed interest in participating in the demonstration are the following:

- The mayor or equivalent executive elected official of the community, and the PHA executive leader, must formally announce a commitment to narrow the broadband digital divide and in so doing demonstrate the connectivity gap that exists in their community among distinct neighborhoods and demographics.
- Communities should develop a plan to promote and expand broadband access, adoption, and use.
- To ensure presence of local support and leverageable HUD infrastructure for implementation of this demonstration, communities should be currently participating in two or more Federal place-based initiatives, such as: The Choice Neighborhoods program; the Promise Zones program; the Promise Neighborhoods program; the Byrne Criminal Justice Innovation program; the Strong Cities, Strong Communities program; the STEM, Energy and Economic Development program; or the Building Neighborhood Capacity program.
- Communities should be broadly committed to realizing the "ConnectED" vision in their public schools, including having clear plans to reach school connectivity goals by 2018—with substantial progress already underway.
- Communities should have more than one Internet service provider, in order to ensure a competitive marketplace in the provision of Internet services that leads to more affordable and higher quality services for households.

As stated in the April 3, 2015, notice, these criteria are meant to create optimal conditions to accelerate the adoption and use of broadband technology, but the criteria may be applied with reasonable flexibility to ensure that a diverse set of communities are considered for participation in this demonstration.

3. Use of Improved Information Technology and Burden Reduction

The information sought to be collected by HUD is pertains to basic information about the community, and does not require any research on the part of any community interested in participating in the demonstration. As provided in the May 15, 2015, notice for emergency processing of HUD's proposed information collection, HUD seeks information on the demographics of the populations served by HUD subsidized housing, the physical and technological infrastructure of the subsidized housing, and potential use of federal and local resources that could be used to address technology needs of the subsidized housing. The information sought by this collection could be provided in paper or electronically. HUD has established an email box, digitalopportunitydemonstration@hud.gov to facilitate communications and any collection of information.

4. Efforts to Identify Duplication and Use of Similar Information

For HUD-subsidized housing, HUD did not find any information collections that are duplicative of that sought through this proposed information collection.

5. Impact on Small Businesses or Other Small Entities

Again, the information sought to be collected is information that any subsidized housing or community should have on hand, and does not require research. Additionally, this is a voluntary collection, not one mandated.

6. Consequences of Collecting the Information Less Frequently

The collection, which is voluntary, need only be submitted once.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

The request fully complies with regulation 5 CFR 1320.5.

8. Comments in Response to the *Federal Register* Notice and Efforts to Consult Outside the Agency

A. As required by 5 CFR 1320.8(d), HUD published in the Federal Register a notice of information collection on May 15, 2015, at 80 FR 27996. HUD received two comments in response to this solicitation. One from a Irven Ingram in Mobile, Alabama stated agreement that readily available broadband access is great step to increase technology access. The commenter said that migrating HUD and PHA functions to a digital media will assist in satisfying technology needs. The second commenter, and Ejemhen Hines, also of Mobile, Alabama, provided a spreadsheet of low-income housing within the community, which provided the demographics of the population of the housing and the income levels. Although not stated, the implication was that HUD was focusing on housing most in need of technology. These were the only two comments received.

B. In addition to the May 15, 2015, Federal Register notice, HUD solicited public comment on its proposed demonstration through notice published in the Federal Register on April 3, 2015, at 80 FR 18248. HUD received public comments. The majority of the comments expressed support for the demonstration as set forth in the April 3, 2015, notice, but one commenter, the Oakland Housing Authority stated that the criteria was too restrictive. Several commenters used the public comment portal to submit expressions of interest in the demonstration. The public comments on the demonstration notice can be found at <http://www.regulations.gov/#!docketDetail;D=HUD-2015-0032>. The selection criteria set forth in the April 3, 2015, notice forms the basis of the information sought by HUD.

9. Explanation of Any Payment or Gift to Respondents

Through this demonstration, HUD offers no funds or any bonus points to be used a competition for funds under one of HUD's notices of funding availability. Through this demonstration, HUD serves a convenor, providing a forum by which private internet service providers can connect with communities as provided in HUD's April 3, 2015, notice

10. Assurance of Confidentiality Provided to Respondents

This collection will not seek to collect any personal identifying information. The information sought solely pertains to the populations served by HUD-subsidized housing, the infrastructure of such housing, and the support of the surrounding community in narrowing the digital divide.

11. Justification for Sensitive Questions

No sensitive questions are being asked by this collection.

12. Estimates of Hour Burden Including Annualized Hourly Costs

A. Estimated Annualized Burden Hours:

| Information Collection | Respondents | Responses Per Respondent | Annual Responses | Per Response | Annual Burden Hours | Hours |
|-----------------------------------------------|----------------|--------------------------|------------------|--------------|---------------------|---------------|
| Demographics | 3400.00 | 1.00 | 50.00 | 3.00 | 1 | 150.00 |
| Physical and Technology Infrastructure | 3400.00 | 1.00 | 50.00 | 3.00 | 1 | 150.00 |
| Potential uses of federal and local resources | 3400.00 | 1.00 | 50.00 | 3.00 | 1 | 150.00 |
| Totals | 3400.00 | 1.00 | 50.00 | 3.00 | 3.00 | 450.00 |

From the number of eligible communities, HUD estimated 50 respondents. As the expiration of the 60-day period draws near, HUD received expressions of interest from 30 respondents.

B. Estimated Annualized Burden Costs:

As noted above, HUD seeks only that information of which the respondent already has on hand since the information sought pertains to the respondent.

13. Estimate of Other Total Annual Cost Burden to Respondent or Record Keepers

There will be no capital, operating, or maintenance costs to the respondent.

14. Annualized Cost to the Federal Government

HUD estimates that the information collected will be reviewed by an HUD employee at no less than the GS-14 level for which the hourly pay is \$41.40. (See http://www.federaljobs.net/salarybase.htm#Hourly_Rates.) Because very brief and basic information is collected, HUD estimates that the review of the information will be no more than 1 hour per respondent. Therefore the cost of review of 50 respondents at 1 hour will be \$2,070.00

15. Changes in Hour Burden

This is a new collection.

16. Plans for Tabulation, Publication, and Project Time Schedule

A. Time Schedule

HUD seeks to commence the demonstration as soon as the 60-day period ends on May 31, 2015.

B. Publication

HUD will announce selected communities at some point after May 31, 2015.

C. Analysis Plan

The April 3, 2015, notice provided in Section III, entitled Evaluating the Demonstration, that HUD intends to build on the outcomes of the demonstration, with the goal of extending the demonstration on a nationwide basis. HUD will work with entities across the government and the broader research community to rigorously measure outcomes associated with work to narrow the broadband digital divide. The participating communities and cross-sector entities are expected to participate in any efforts designed to identify and share best practices from the demonstration with other HUD-assisted communities. In addition, participating communities and entities will be required to collaboratively develop and subsequently measure and report outputs and outcomes.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

No exemption is requested.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

This data collection has been designed in accordance with the requirements specified in Item 19 of the OMB 83-I. No exceptions to certification are requested.

19. Collections of Information Employing Statistical Methods

There are no statistical methods used in this collection.