Supporting Statement for Paperwork Reduction Act Submission

Title: Strong Cities, Strong Communities National Resource Network
OMB Control #: 2528-0289

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.*

   The purpose of these two collection instruments are to collect data about applicants (cities with a population of 40,000 or more persons that meet unemployment, poverty, and population decline criteria) for technical assistance to the Strong Cities, Strong Communities National Resource Network (SC2 NRN), administered by the Office of Policy Development and Research at the U.S. Department of Housing and Urban Development. The SC2 NRN provides comprehensive technical assistance to cities with populations of 40,000 or more that are experiencing long-term economic challenges as evidenced by population decline, high unemployment rates, high poverty, and low education attainment.

   The first collection instrument ("Direct Assistance By the National Resource Network") will be filled out as a web-based form as the Request for Assistance on http://www.nationalresourcenetwork.org. This is a revision to an approved collection to include a request that applicants submit the following documents as PDFs or weblinks:
   - Signed letter from the chief executive, expressing support for the city's request for assistance
   - The city's most recent budget
   - The city's last three years of Comprehensive Annual Financial Reports (CAFR) and annual audits
   - Citywide economic development strategy

   A copy of this instrument is attached.

   The second collection instrument ("Pre-Engagement and Post-Engagement Interview Guides) is a set of two phone surveys that representatives from the NRN consortium will use with cities receiving assistance to conduct a program evaluation. Answering the questions and participation in the program evaluation is optional. A copy of this instrument is attached.

   The Notice of Funding Availability (NOFA) for the SC2 NRN (FR-5600-N-39) requires that the winning consortium develop an initial intake system for cities requesting direct assistance and conduct an evaluation the network and its activities. A copy of this NOFA is attached.

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.*

This is a revision of an existing collection, FR-5758-N-14. The SC2 NRN is seeking to evaluate its program through a combination of site visits, surveys, interviews, and quantitative and qualitative data collection.

In addition, the SC2 NRN will solicit information from cities to provide direct technical assistance. Such information includes information related to population; employment rates; poverty; education attainment; fiscal and economic distress; priorities, goals, and initiatives of local government; regional partnerships or efforts; types of direct assistance that could improve a city's economic outcome; support from political and community leadership; city budgets; and comprehensive annual financial reports.

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 information on cities requesting direct technical assistance will be collected electronically using http://www.nationalresourcenetwork.org. The SC2 NRN is using this website due to the agency and federal government's efforts to make it easier for the public to apply.

The program evaluation instrument will be used during phone interviews after a city has agreed to direct technical assistance, first before the engagement begins and then after the engagement has concluded.

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.*

   This program does not duplicate any existing government program. No similar information is available.

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.*

   This program does not involve small businesses directly.

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 information were not collected pursuant to submitting applications, HUD would have no qualitative way to select an applicant to engage in technical assistance among the various applicantions submitted. If information were not collected for program evaluation purposes, HUD would not be able to ensure that federal dollars were being spent wisely and demonstrate the impact of the taxpayer investment.

   Information collected pursuant to submitting applications is requested only once per application cycle, the minimum amount of time possible. Information collected for program evaluation purposes is collected twice during each direct city engagement. To require less frequent submission would mean that the evaluation could not capture the impact of the federal investment in each of the cities assisted.

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 is none.

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.*
   - *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 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 preclude consultation in a specific situation. These circumstances should be explained.*

   A 60-Day Notice was published in the Federal Register. A copy is attached to this submission. HUD received no comments on the Notice.

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

   None

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

    None

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.*

    None.

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.*

1) Direct Assistance Questionnaire:
HUD determined 3.2 hours for filling out the direct assistance intake questionnaire, which was determined by taking the average response time reported by seven cities that filled out the questionnaire. HUD estimates the mean hourly rate at $30. For 500 applications, the computation is as follows: 500 applications X 3.5 hour X $30 per hours= $52,500.

2) Program Evaluation Interview Guides
HUD estimates that the cities assisted will spend approximately 1.5 hours answering the front-end phone survey for the program evaluation, and then 1.5 hours answering the post-engagement survey questions, for a total of 3 hours per engagement. HUD estimates the applicable hourly rate at $30. The computation is as follows: 240 total responses x 1.5 hours x $30 an hour = $10,800.

Description of Information Collection	Number of Respondents	Responses per Year	Total Annual Responses	Hrs per Response	Total Hours
Direct Assistance by the National Resource Network Questionnaire	500	1	500	3.2	1600
Pre- and Post- Engagement Review Guide	120	2	240	1.5	360

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.*

None

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.*

HUD's awarded the responsibility of collecting this information to the consortium grantee who was the successful applicant to the NOFA for the SC2 NRN. This cooperative agreement includes $4.9 million in Federal funds, with $483,750 allocated for intake of cities requesting direct assistance and $ $490,458.33 for the program evaluation.

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

    None

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.*

    N/A

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.*

    No such approval is sought

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

    None requested.

B. Collections of Information Employing Statistical Methods

None