

Supporting Statement for Paperwork Reduction Act Submissions

Housing Counseling Training Program SF-424, SF-424Supplement, SF-424CB, SF-2880 OMB – 2502-0567

A. Justification

1. The Office of Housing Counseling is responsible for administering the Department's Housing Counseling Program, and its Housing Counseling Training Program as authorized by Section 106 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701x), and the Housing Counseling Program regulations at 24 CFR, part 214.

The Housing Counseling Program supports the delivery of a wide variety of housing counseling services to low and moderate income homebuyers, homeowners, renters, and the homeless. The primary objectives of the program are to expand homeownership opportunities and improve access to affordable housing. Counselors provide guidance and advice to help families and individuals improve their housing conditions and meet the responsibilities of tenancy and homeownership. Counselors also help borrowers avoid predatory lending practices, such as inflated appraisals, unreasonably high interest rates, unaffordable repayment terms, and other conditions that can result in a loss of equity, increased debt, default, and foreclosure. There are more than 2,400 active HUD-approved housing counseling agencies.

2. To improve the quality and standardize the counseling that HUD approved counseling agencies provide, HUD implemented a Housing Counseling Training program in 2006. The Housing Counseling Training NOFA requests rating factors responses, forms, and supporting documentation used by HUD's Office of Housing Counseling to rank applications submitted through Grants.gov. The collection allows HUD to evaluate and select the most qualified applicant(s).

Each of these national housing counseling agencies may have sub-grantees that are required to adhere to record keeping and reporting requirements. The collection of post award data during the grant management period is done electronically and the information is used to assure compliance with the grant agreement.

The FY 2014 Notice of Funding Availability (NOFA) competed \$2.0 million for a one-year period, with FY 2015 funding of \$2.0 million awarded based on the FY 2014 scoring. Three national housing counseling agencies were awarded funds.

After consultation with three (3) grantees, personnel estimated that the time to process applications, grant documents and quarterly reports accounted for less time than previously estimated. This will account for the decrease in the costs previously reported. The number of hours has increased as the estimates are based on the anticipated number of respondents (applicants) rather than the number of grantees.

3. Unless otherwise directed, applications in response to the proposed FY 2016 NOFA will be submitted electronically through Grants.gov. Electronic submission eliminates the burden on applicants to print, organize, and ship multiple copies of their applications. Additionally, Grants.gov auto-populates common elements of many forms, so that standard information about the applicant that appears on several forms only needs to be entered once. Documents such as letters of support, letters of matching funds, Memorandum of Understanding from proposed partners may be faxed.
4. The Housing Counseling Training Program is distinct from the Housing Counseling Program which requires similar forms for its applicants. However, the proposed data collection is not duplicative.
5. The information collected does not impact small businesses or small entities.

6. The collection is needed to ensure that applicants meet particular eligibility criteria and possess the capability to deliver effective and efficient services. Also, the collection is needed for monitoring grant management.
7. There are no special circumstances causing an information collection to be conducted in the following:
 - * requiring respondents to report information to the agency more often than quarterly;
Not applicable.
 - * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
Not applicable.
 - * 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;
Not applicable.
 - * in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
Not applicable.
 - * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
Not applicable.
 - * 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;
Not applicable.
 - * requiring respondents to submit proprietary trade secrets, 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.
Not applicable.
8. Information collected is conducted in a manner consistent with the guidelines of 5 CFR 1320.8(d). The Notice announcing this collection of information appeared in the *Federal Register* on Thursday, February 4, 2016. (Vol. 81, No. 23, page : 6035) no comments were received.

Estimates for the OMB-83i are based on consultation with the following national housing counseling training grantees:

Neighborhood Reinvestment Corporation
1325 G St., NW Suite 800
Washington, DC 20005-3104
Jayna Bower

National Council of La Raza
1126 16th St., NW
Washington, DC 20036-4804
Cynthia Parra

National Community Reinvestment Coalition
727 15th St., NW, Suite 900
Washington, DC 20005-6027
Nsonye Anarado

9. There are no payments to respondents, other than to awardees under the Training NOFA.
10. HUD is taking the standard precautions regarding the electronic transfer of sensitive information such as client level data, including firewall protection, encryptions, and access security. Additionally, the information provided is subject to the Privacy Act and may be made available only to the appropriate Federal, State, and local agencies.
11. There are no questions of a sensitive nature.
12. Estimate of public burden:

HUD personnel review the NOFA applications and monitoring the awardees. The hourly rate is based on a GS-14-1 salary.

| Information Collection | Number of Respondents | Frequency of Response | Number of Responses | Burden Hours per Response | Total Burden Hours | Hourly Cost | Total Annual Cost |
|---|-----------------------|-----------------------|---------------------|---------------------------|--------------------|-------------|--------------------|
| One-time submission | | | | | | | |
| SF-424 | | | | | | | |
| SF-424-Supp | | | | | | | |
| HUD-424CB (2501-0017) | 8 | 1 | 8 | 2 | 16 | \$52 | \$832 |
| HUD-2880 (2510-0011) | 8 | 1 | 8 | 1 | 8 | \$52 | \$416 |
| | | | | | | | |
| NOFA Rating Factors-Narratives 1-5 | 8 | 1 | 8 | 102 | 816 | \$52 | \$42,432 |
| | | | | | | | |
| Post Award Submission | 3 | 1 | 3 | 12 | 36 | \$52 | \$1,872 |
| | | | | | 876 | \$52 | \$45,552 |
| Grant Management – quarterly reporting | | | | | | | |
| Grant Management – quarterly reporting | 3 | 4 | 12 | 25 | 300 | \$52 | \$15,600 |
| | | | | | | | |
| Total | 3 | 4 | 12 | 25 | 300 | \$52 | \$15,600 |
| Grand Total | | | 39 | | 1176.00 | \$52 | \$61,152.00 |

The burden hour and hourly cost was based on consultation with three respondents. However, the data varied because of difference in size and complexity resulting in the estimates being averaged. The cost is less than the last submission because the respondents now have actual experience with the forms and documents. The number of hours has increased as the estimates are based on the anticipated number of respondents (applicants), rather than the number of grantees.

13. There are no additional costs to respondents.

14. Estimate of Costs to the Federal Government:

| Information Collection | Number of Responses | Hours per Response | Total Hours | Hourly Cost | Total Annual Cost |
|--|---------------------|--------------------|-------------|-------------|-------------------|
| One-time submission | | | | | |
| Review of applications | 6 | 21 | 126 | \$35 | \$4,410 |
| Ongoing requirement | | | | | |
| Grant Management – quarterly reporting | 12 | 4 | 48 | \$35 | \$1,680 |
| Grand Total | | | 174 | \$35 | \$6,090.00 |

15. This is a revision of a currently approved collection. There are no changes to the previous collection. After consultation with three (3) grantees, personnel estimated that the time to process applications, grant documents and quarterly reports accounted for less time than previously estimated. This will account for the increase in burden hours that was reported.
The estimate is based on actual Housing Counseling Training Program awardee experience with the Training NOFA resulting in adjustments. The HUD 96010- Logic Model, SF-LLL and HUD 2994a will not be required as in the previous collection. These forms do not affect how the counseling program is being administered.
16. HUD will publish the information on the selected grantee(s), including the name of the organization, the address, organization mission, and grant amount.
17. HUD is not seeking approval to avoid displaying the OMB expiration date.
18. There are no exceptions to the certification statement identified in Item 19.

B. Collections of Information Employing Statistical Methods

This collection does not employ statistical methods.
