

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification

1. Why is the information necessary?

Identify the legal or administrative requirements that necessitate the collection.

Attach a copy of the appropriate section of each statute and regulation mandating/authorizing the collection of information.

The Rural Capacity Building for Community Development and Affordable Housing (RCB) program and the funding made available have been authorized by the Annual Appropriations Acts each year since FY 2012. The competitive funds are awarded to national nonprofits through a Notice of Funding Availability (NOFA) to carry out eligible activities related to community development and affordable housing projects and programs. Applicants are required to submit certain information as part of their application for assistance.

2. What information is to be collected?

From whom?

How is it collected?

How will the information be used; for what purpose and by whom.

How has it been used in the past?

The information will be collected by HUD via Grants.Gov during the application process. Collection of these data will enable HUD to select awardees under a competitive process. Without the information, it would be impossible to determine which applicants were eligible for award. The forms and uses of the forms are as follows:

- ***SF-424: Application for Federal Assistance – This is an OMB form that is used government-wide to request Federal assistance. The Federal awarding agencies and OMB use information reported on this form for general management of Federal assistance awards programs.***
- ***SF-424 Supplement: Survey on Ensuring Equal Opportunity for Applicants – Ensures that all qualified applicants, small or large, non-religious or faith-based, have an equal opportunity to complete for Federal funding.***
- ***HUD 424CB: Grant Applications Detailed Budget – Applicant provides detailed budget information on its proposed activities.***
- ***SF LLL: Disclosure of Lobbying Activities – Applicants use this form to disclose any lobbying activities that will be using funds other than Federal appropriated funds to pay for influencing or attempting to influence any officer or employee of the agency, member of Congress, or office or employee of a member of Congress in connection with this Federal award.***
- ***HUD 2880: Applicant/Recipient Disclosure/Update Report – Applicants applying for and receiving more than \$200,000 must complete this form. Applicant provides HUD with information regarding other government sources and uses of funding along with a list of interested parties involved in the application for assistance.***

- **HUD 2995: Certification of Consistency with Sustainable Communities Planning and Implementation – Applicants are required to complete this form to receive bonus points. The form documents the applicant’s ability to meet the following criteria:**
 - (1) **The applicant is engaged in activities, that in consultation with the designated Point of Contact of the HUD designated Preferred Sustainability Status Communities, further the purposes of the regional planning grant program;**
 - (2) **The applicant’s proposed activities either directly reflect the Livability Principles cited and constrained in HUD’s General Section to the FY2016 NOFAs or will result in the delivery of services that are consistent with the goals of the Livability Principles**
 - (3) **The applicant has committed to maintain an on-going relationship with the HUD Preferred Sustainability Status Communities for the purposes of being part of the planning and implementation processes in the designated area.**
 - **Narratives (Rating Factors 1-5) – Applicants are required to respond to five factors that will discuss its capacity to administer the program as well as discuss the proposed activities that will be carried out with Rural Capacity Building funds during the term of the grant agreement. The factors provide relevant examples to support the proposal and describe the communities, populations, and organizations that the applicant proposes to serve and the specific outcomes expected as a result of the activities.**
3. Is the information submitted electronically? If not, why?
 Will it ultimately be managed in an automated system? Identify the system.
 Describe whether, and to what extent, the collection of information is automated (item 13b1 of OMB form 83-i).
 Under the Government Paperwork Elimination Act (GPEA), the public must be provided with the option of responding electronically. If that is not feasible, explain why. This must be addressed.
Applications must be submitted electronically to Grants.gov unless a waiver has been issued allowing the applicant to submit a paper form. This is standard procedure for HUD as implemented by the Grants Management Office (GMO). All forms required for application submission may be found in the application and instructions downloads on Grants.gov at <http://www.grants.gov/web/grants/applicants/apply-for-grants.html>
4. Is this information collected elsewhere? Review current information collection packages for potential consolidation.
This information is not collected elsewhere.
5. Does the collection of information impact 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 or other small entities.
6. Why can’t the information be collected less frequently – or not at all?
 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, HUD has no way to select awardees for the grants.
7. Explain any special circumstances requiring:
- response more than quarterly;
 - response in fewer than 30 days;
 - more than an original and two copies of any document;
 - retain records for more than three years (*other than health, medical, government contract, grant-in-aid, or tax records*);
 - statistical surveys not designed to produce results than can be generalized to the universe of study;

- statistical data classification not been approved by OMB;
- a pledge of confidentiality that is not supported by 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
- respondents to submit proprietary trade secret, or other confidential information.

None.

8. Date and page number of the *Federal Register* notice (provide a copy) soliciting comments and public input. Summarize any public comments and describe response to comments. Describe all efforts to consult with persons outside the agency to obtain their input.

In accordance with the Paperwork Reduction Act of 1995, the Department of Housing and Urban Development (HUD), published a notice in the Federal Register on October 2, 2015. The document number is volume 80 page59807. No comments were received.

9. Explain any payments or gifts to respondents, other than remuneration 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. Justify any questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private

None.

12. Estimate public burden:

- number of respondents,
- frequency of response (*if a respondent provides multiple documents at one time, consider that a single response*),
- average total responses annually
- average annual hour burden.

Read the complete instructions on the form 83i. **Explain how the burden was estimated.** Generally estimates should not include burden hours for customary and usual business practices;

- if this collection uses more than one form, provide **separate estimates for each form** and aggregate the hour burdens in item 13 of OMB Form 83i; 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.

HUD estimated that each applicant spend approximately 40 person-hours to complete and application. HUD estimates the mean hourly rate at \$40. For 30 applications, that would be: 30 applications x 40 hours x \$45 per hour = \$54,000.

	Number of Respondents	Annual Responses	Hours per Response	Total hours	Cost per Hour	Total Cost
Application	30	1	40	1200	\$45	\$54,000

Information will be collected once per applicant annually for each Rural Capacity Building Program NOFA. The total estimated average hourly burden for this information collection is 40 hours per applicant for a total of 1,200 hours for an estimated 30 applicants. Estimates are based on hours provided for similar programs.

Paperwork Requirement	Number of Respondents	Frequency	Hours per Response	Total Annual Hours
SF 424	30	1	1	30
SF 424 Supplement	30	1	.5	15
HUD 424 CB	30	1	5	150
SF LLL	30	1	.5	15
HUD 2880	30	1	.5	15
HUD 2995	30	1	.5	15
HUD 96011	30	1	.5	15
Rating Factor 1	30	1	8.5	255
Rating Factor 2	30	1	5	150
Rating Factor 3	30	1	8	240
Rating Factor 4	30	1	5	150
Rating Factor 5	30	1	5	150
Total	30	-	40	1200

13. Estimate of the average, annual cost beyond the cost of hour burden shown in Items 12. Read the complete instructions on the form 83i.

None.

14. Estimate annualized costs to HUD of collecting the information, including processing the information.

Approximately 30 applications are expected. Each application goes through a review which takes eight hours to conduct. The review is conducted by two people, having an average grade of GS-14 at an hourly rate of \$51.43. Thus, 30 applications x 2 persons x 8 hour x \$51.43 per hour = \$24,686.40.

15. Explain any program changes or adjustments reported in items 13 and 14 of the OMB Form 83i.

Also explain any other changes/revisions to the information collection.

None.

16. If the information will be published, outline plans for tabulation and publication.

Not applicable.

17. Explain any request to not display the expiration date.

Such approval is not requested.

18. Explain each exception to the certification statement identified in item 83i-19.

This includes, specifically, providing the required information to respondents:

- The OMB control number and expiration date;
- Why the information is being collected;
- Use of the information;
- Burden estimate;
- Nature of response (voluntary, required for a benefit, or mandatory);
- Nature and extent of confidentiality; and
- The requirement to display currently valid OMB control number.

None.

Even if no forms are used to collect the information, respondents must be provided this information. Be prepared to explain how this requirement is met.