

Supporting Statement for Paperwork Reduction Act Submissions
Community Compass Technical Assistance and Capacity Building Program NOFA
OMB # (2506-0197)

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 information collected provides for an application for grants to fund technical assistance measures in response to demand from a variety of HUD program areas and field offices. This information is necessary to appropriately and objectively identify competition winners and monitor the expenditure of grant funds. Sufficient information is required for the Department to base a judgment as to the technical capability of the prospective providers in providing technical assistance to HUD grantees. The information also is used to assign selected awardees tasks under the cooperative agreement on a demand-response basis. The administrative requirements that authorize the collection of this information are contained within 2CFR Part 200, governing grants and cooperative agreements. These regulations address activities and information that must be provided by grant applicants and awardees, as well as those actions that HUD must take, and information HUD must review, during the pre-award, award, and post-selection phases of the competition and grants management.

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 information is used to determine the most qualified technical assistance providers best able to offer HUD the ability to shape its CPD and other available resources into effective, coordinated, neighborhood and community development strategies to revitalize and strengthen communities nationwide through structural, social and economic improvements. The information collected from these providers has been used previously and will continue to be used to evaluate the provider's performance and progress towards achieving its and HUD's strategic objectives.

In addition to monetary performance, the information is also used to support payment requests from technical assistance providers to HUD for reimbursements of expenses necessary to complete their assigned tasks in order to meet their strategic goals. Technical assistance providers develop work plans that are submitted to HUD for the applicable program area to which they are providing products and/or services. As a result of the FY2015 competition, approximately 230 work plans are currently in place which requires quarterly reporting, monthly recordkeeping, as well as billing and payment processing for expenses.

SF-424	This is a standard form required for use as a cover sheet for submission of pre-applications and applications and related information under discretionary programs.	This forms provides applicant's contact information, EIN Number, DUNS number, amount of funds requested, and other information regarding eligibility requirements
HUD-424CB	HUD Grant Application Detailed Budget	Detailed Budget provides 3-year plan regarding how funds will be expended in completed project activities and related requirements.
HUD-424CBW-I	HUD Grant Application Budget Worksheet	Applicant is required to complete this form in order to explain in detail how all grant forms will be used and for what specific purpose. Form must confirm that funds will be used within program requirements and policies.
SF-LLL	Disclosure of Lobbying Activities	Completion of this form is required to disclose lobbying activities pursuant to 31 U.S.C. 1352
HUD-2880	Applicant/Recipient Disclosure/Update Report	Applicant is required to complete this form in order to verify there are no conflicts of

		interest or violations of government policies with respect to receiving funds from the government.
HUD-50070	Certification for a Drug-Free Workplace	Applicant must complete this form to certify that they will or will continue to provide a drug-free workplace by:

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.

In accordance with the requirements stated in the NOFA, applicants have been able to submit their applications electronically through Grants.gov since 2004. In addition, HUD accepts electronic transmission of quarterly reports from our grantees and awardees

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 narrative responses will be collected once per year, based on unique applicant pools and comprised of year sensitive information. The narrative responses are program specific, and so are the only assessment tools available for HUD to determine the relevant and up-to-date capacity, experience and expertise of our TA applicants. The reporting information collected is engagement and task-specific, and, therefore, unique to each recipient's TA award.

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 collected does not have a significant economic impact on small businesses.

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.

Less frequent data collection would damage HUD's ability to effectively manage technical assistance efforts and would not be consistent with government wide standards for the management of cooperative agreements. The loss of this collection mechanism would severely impair HUD's ability to assess TA providers and therefore reduce the efficiency with which we can provide sound and relevant assistance to CPD grantees. The net loss would accrue at the local level through less effective programming and reduced provider capacity. Failure to collect application data yearly would limit HUD's ability to incorporate timely knowledge about the applicant's recent activity, successes and failures, and therefore, impede HUD's ability to assess awardees. Failure to collect monthly invoice and activity reports, including engagement status data, would significantly impair HUD's ability to assess performance, make adjustments, and address significant challenges that arise during the grant term.

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; **Yes, the applicants submit invoices for reimbursement of services on a monthly basis along with monthly activity report describing the services performed.**
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; **N/A**
- requiring respondents to submit more than an original and two copies of any document; **N/A**
- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years; **N/A**
- 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; **N/A**
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB; **N/A**

- 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 **N/A**
- 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. **N/A**

Recordkeeping, for the purposes of providing justification for the reimbursements of expenditures as identified in the applicant's payment request, may be necessary to be conducted on a monthly basis as consistent with monthly payment requests.

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.

Published in the Federal Register on April 26, 2016, Vol 81, page 24628. No comments were received from the publication.

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

Applicants and awardees do not receive gifts or any additional forms of payments outside of the terms of the award.

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

The applicants are not provided any assurances of confidentiality.

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.

There are no questions asked of respondents that are of a sensitive nature.

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

- *0 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;
- *1 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
- *2 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.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Pre-Award							
Application Essay	52	1	52	40.00	2,080.00	25.00	\$52,000.00
Pre-Award							
HUD-424CB	52	1	52	2.60	135.20	\$25.00	\$3,380.00
HUD-424CBW-I	52	1	52	3.20	166.40	\$25.00	\$4,160.00
HUD-2880	52	1	52	2.00	104.00	\$25.00	\$2,600.00
HUD-50070	52	1	52	0.17	8.84	\$25.00	\$221.00
SF-LLL*	---	---	---	---	---	---	--
Total	52	---	---	47.97	2,494.44	\$25.00	62,361.00

*Per OMB, Standard Form should be listed, but the burden does not need to be included as part of the collection.
Annualized Cost @ \$25/hr: \$62,361.00

Explanation of burden hours: Number of responses is based on number of eligible applicants under the NOFA guidelines. The chart above reflects the application forms that are included in each application submitted for review. The application essay consists of essay responses, company background information, statements regarding capabilities, past performances, strategic objectives, accounting procedures, and other documents which allow HUD to effectively measure the applicants suitability to be awarded federally funding through the NOFA Cooperative Agreement.

NOTE: This estimate is higher than the previous submission as a result of the Application Essay portion now properly being accounted for in the burden hours. The application essay was also a requirement in the previous NOFA application processes.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information (do not include the cost of any hour burden shown in Items 12 and 14).

*3 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;

*4 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.

*5 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.

There no additional costs to the applicant.

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.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Pre-Award							
Application	52	1	52	25	1,300.00	\$57.39*	\$74,607.00
Post-Award							
Work Plans	23	10	230	18	4,140.00	\$57.39*	\$237,594.60
Reports	23	4	92	6	552.00	\$57.39*	\$ 31,679.28
Recordkeeping	23	12	276	4	1,104.00	\$57.39*	\$ 63,358.56
Total	---	---	----	----	7,096.00	\$57.39*	\$407,239.44

*Annual Cost Per Response is calculated at a GS-14 Step 4 @ \$57.39 with the approximate salary of government employee involved in the review and subsequent monitoring of the applicants.

Applicants submit initial responses to the NOFA which are reviewed by HUD approving board and staff members. Based on previous submissions, we anticipate 52 applicants responding to the NOFA with approximately 23 awardees. Each award will carry an average of 10 work plans that are each reviewed for approval and/or amended changes. The HUD staff members also review quarterly reports from the awardees. Additionally, the awardees are required to submit invoices and corresponding activity reports on a monthly basis to be reviewed by HUD staff members.

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

This is a revision of a currently approved collection with increased burden hours and a higher number of respondents. The program has expanded to other HUD programs; therefore, the name is being changed from OneCPD to Community Compass.

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.

The information that is submitted will not be published. However, the names and funding amounts of awardees selected through this competition of the NOFA will be published in the Federal Register for approximately six months after receipt of these applications.

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.

There is no request to prohibit the displaying the expiration date.

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

There is no exception to the certification statement. 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.

B. Collections of Information Employing Statistical Methods