

Supporting Statement for Paperwork Reduction Act Submissions
OneCPD Technical Assistance and Capacity Building Needs Assessment
OMB No. 2506-0198

A. Justification

1. Why is the information necessary?

Identify the legal or administrative requirements that necessitate the collection.

2 CFR 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

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

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?

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 20 work plans are currently in place which requires quarterly reporting, monthly recordkeeping, as well as billing and payment processing for expenses.

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.

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

4. Is this information collected elsewhere? Review current information collection packages for potential consolidation.

No similar information exists. 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. 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.

The information collected does not have a significant economic impact on small businesses and is acceptable via electronically. This method minimizes any burden this collection process has on small businesses.

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.

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 requiring:
 - response more than quarterly; **N/A**
 - response in fewer than 30 days; **N/A**
 - more than an original and two copies of any document; **N/A**
 - retain records for more than three years (*other than health, medical, government contract, grant-in-aid, or tax records*); **N/A**

- statistical surveys not designed to produce results that can be generalized to the universe of study; **N/A**
- statistical data classification not been approved by OMB; **N/A**
- 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 **N/A**
- respondents to submit proprietary trade secret, or other confidential information. **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. 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.

Published in the Federal Register on June 20, 2016, Vol 81, page 39943. No comments were received.

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

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

12. Estimate public burden:

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Targeted Needs Assessment	120	1	120	52	\$6,240.00	\$64.16	\$400,358.40
Total	120	-	-	52	6,240.00	\$64.16	\$400,358.40

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.

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.

There no additional costs to the applicant.

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

ANNUAL ESTIMATED LABOR COSTS FOR NEEDS ASSESSMENTS		
	TASK	COST
TA Provider	40 Targeted @ 76 hours X \$64.16 /hour	\$195,046.40
TA Provider	80 Blended @ 156 hours X \$64.16 /hour	\$800,716.80
HUD FO	40 Targeted @ 2 hours X \$55.74/hour	\$4,459.20
HUD FO	80 Blended @ 3 hours X \$55.74/hour	\$13,377.60
TOTAL		\$1,013,600.00

Note: Hourly rates for HUD FO based on FY2016 General Schedule Pay Table, Grade 15, Step 5 (\$55.74). Hourly rates based on May 2015 Department of Labor, Bureau of Labor Statistics, National Occupational Employment & Wages Statistics, median rate of \$49.35 for Training Manager. Fringe costs of 30% added to all hourly rates so actual rates used were \$64.16 respectively. For DOL rates, visit: http://www.bls.gov/oes/current/oes_nat.htm. For GS rates, visit: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/16Tables/html/GS_h.aspx.

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.

Decrease based on the targeted need assessment.

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

The information that is submitted will not be published. However, the awardees of the NOFA will be published in the Federal Register for approximately six months after receipt of these applications.

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

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

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

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.