

Supporting Statement for Paperwork Reduction Act Submissions

Budget-Neutral Demonstration Program for Energy and Water Conservation Improvements at Multifamily Housing Residential Units (Pay for Success Pilot)

OMB Control Number 2502-xxxx
(List of form numbers)

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. Include a statement regarding the changes for this submission.

Title LXXXI of the Fixing America's Surface Transportation Act (Public Law 114-94) authorizes the Department of Housing and Urban Development (HUD) to establish a demonstration program under which the Secretary may execute budget-neutral, performance-based agreements in fiscal years 2016 through 2019 that result in a reduction in energy or water costs. The legislation authorizes HUD to implement this pilot in up to 20,000 units of multifamily buildings participating in the project-based rental assistance (PBRA) program under section 8 of the United States Housing Act of 1937; supportive housing for the elderly program operating under section 202 of the Housing Act of 1959; and supportive housing for persons with disabilities under section 811(d)(2) of the Cranston-Gonzalez National Affordable Housing Act.

HUD is authorized under this legislation to establish a competitive process for selecting one or more qualified applicants to serve as Intermediaries who will, per agreements with HUD, be responsible for initiating and managing an energy and water conservation retrofit program at eligible properties. For the purpose of this programs, applicants are defined as business entities applying to participate. The documents that are the subject of this notice are those used by applicants applying to participate in this program. This information will allow applicants to submit their proposal and for the government to evaluate this information. This is a new information collection request.

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.

Application information submitted for the Pay for Success pilot will be used by HUD to evaluate applications submitted in response to the Notice of Funding Availability (NOFA) which will be the competitive vehicle for the PFS Pilot. Specific submission requirements and evaluation criteria will be codified in the NOFA.

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.

PFS Pilot applications will be submitted electronically through the Grants.gov application portal. OMB standard forms will be utilized where possible to minimize information collection burden. Narrative response required as part of the application will be submitted in standard electronic formats.

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.

There is no duplication of reporting as this is a newly authorized program to competitively seek intermediaries to carry out water and energy conservation improvements at HUD-assisted multifamily properties. HUD does not currently collect the application data necessary for an applicant to put together a proposal and for HUD to evaluate it for application selection.

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 information collection has no impacts on small business or other small entities.

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.

HUD is required by the PFS Pilot statute to establish a competitive process by which entities can apply to this program. This information collection supports that provision of the law by allowing applicants to apply and for the government to evaluate the information provided.

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 often than quarterly;**
None

*** requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
None

*** requiring respondents to submit more than an original and two copies of any document;**
None

*** requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
None

*** 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;**
None

*** requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

None

*** 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**

None

*** 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.**

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 on 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 may preclude consultation in a specific situation. These circumstances should be explained.

In accordance with 5CFR 1320.8(d), this information collection soliciting public comments was announced in the Federal Register on June7, 2016, Volume 81, No. 109, Pages 36580. No Comments received.

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

No payment or gift will be granted to the respondents.

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

The confidentiality of applicant submitted information for the PFS Pilot will follow all existing statutes and regulations.

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.

No sensitive information is being asked by this collection.

12. Provide estimates of the hour burden of the collection of information.

The number of respondents for the PFS Pilot application is estimated in the table below. Applications must be submitted by each applicant applying to be selected to participate in the program. HUD is authorized to select organizations that can provide water and energy conservation measures in up to 20,000 units of HUD Multifamily assisted properties, which roughly equates to 200 projects. HUD anticipates that application demand for the program will be low due to the lack of appropriated funding to provide seed funding to participants; multiple risks borne by the applicant, including receiving third-party financing to be repaid by future utility savings; and the extensive capabilities and qualifications required to submit a competitive application.

The hour burden is based on amount and type of information requested in the PFS Pilot NOFA. HUD anticipates a burden of 20 hours per response based off the NOFA rating factors and the time needed to address them through a narrative response.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Year	Burden Hours Per Response	Annual Burden Hours	Hourly Cost per Response	Total Annual Cost
PFS Pilot Application	15	1	15	20	300	\$41	\$12,300
TOTALS	15		15		300		\$12,300

13. Provide an estimate for 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).

There is no start-up or additional costs to the respondents other than those reported in Item 12 above. The GS-14, step 1 wage was used for this collection, at \$41 per hour.

14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

Provided below is an analysis of the costs for review and approval of documents within this collection for purposes of transparency in the internal costs incurred by HUD.

The cost estimates are based on the number of expected annual responses as described in Item 12. HUD's cost of collection is exclusively borne by the staff time needed to review and act on (i.e., approve, reject, solicit additional information) each application submission. Documents will be reviewed by staff at a GS-14 level due to the complex nature of this program.

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

This is a new information collection so there are no program changes or adjustments.

16. For collections 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.

This information collection will not be published.

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.

The OMB approval number and date will appear on the HUD-prescribed form.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no collections of information that employ statistical methods.