Supporting Statement for Paperwork Reduction Act Submissions Information Collection: Promise Zone Reporting Tools

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.

Under the Promise Zones initiative, the federal government will invest and partner with highpoverty urban, rural, and tribal communities to create jobs, increase economic activity, improve educational opportunities, leverage private investment, and reduce violent crime. Additional information about the Promise Zones initiative can be found at <u>www.hud.gov/promisezones</u>, and questions can be addressed to <u>promisezones@hud.gov</u>.

HUD designated fourteen communities as urban Promise Zones between 2014 and 2016 under FR 5774-N-01, FR 5774-02 and FR 5774-N-04. The federal administrative duties pertaining to these designations shall be managed and executed by HUD for ten years from the designation dates pursuant sections 2 and 3 of the HUD Act, 42 U.S.C. § 3531-32, to assist the President in achieving maximum coordination of the various federal activities which have a major effect upon urban community, suburban, or metropolitan development; to develop and recommend the President policies for fostering orderly growth and development of the Nation's urban areas; and to exercise leadership, at the direction of the President, in coordinating federal activities affecting housing and urban development.

The collection of information is necessary to ensure the success of the Promise Zone initiative. The information collection will allow HUD to track the progress made by each Promise Zone of completing the 10-year plan submitted as part of the application process. It will also allow HUD to facilitate communication between local and federal partners, HUD proposes that Promise Zone Lead Organizations submit minimal reports and documents to support collaboration and problem solving between local and federal partners. These reports will also assist in communications and stakeholder engagement, both locally and nationally.

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.

The Promise Zone designated community (lead organization) will submit the report and supporting documentation electronically to the federal staff member assigned by HUD. The purpose of the collection is to track the progress made by the Promise Zone community in completing the 10-year plan submitted as part of the Promise Zone application process. The collection will also facilitate communication between local and federal partners on a timely basis to support collaboration and problem solving. These reports will also assist in communications and stakeholder engagement, both locally and nationally. HUD templates for each of these reports are included in this package.

Monthly Federal Grant Report: By the last day of each month the Promise Zone Lead Organization shall submit a spreadsheet listing federal grants for which it and its Promise Zone partners are planning to apply, have applied, or have been awarded. This includes federal grants that do and do not offer a Promise Zone preference. To track the impact of the Promise Zone initiative, it is critically important to accurately document the amount of federal funding that has been secured for Promise Zone activities. These reports will be shared with the relevant federal partner agencies for verification and the final award amounts will be disseminated to the Promise Zone Lead Organizations.

Quarterly Report: On a quarterly basis the Promise Zone Lead Organization shall submit this spreadsheet to their HUD Community Liaisons. Using a HUD template, Promise Zone Lead Organizations shall provide an update on Promise Zone partners' activities for the past quarter, including milestones and accomplishments, major challenges, upcoming plans and priorities, and desired federal assistance.

Investments Spreadsheet: Promise Zone Lead Organizations are also asked to make a good faith effort to provide updates, as is practicable, on applications for non-federal assistance and any new state, local, philanthropic or private sector investments Promise Zone partners have secured via HUD's *Promise Zone Investments Spreadsheet*. The *Promise Zone Investments Spreadsheet* will be cumulative and will help to document what non-federal funding has been invested in the Promise Zone over time.

New Amenities Spreadsheet: To aid in the tracking of new investments in the Promise Zone over time, please list the name and (if possible) addresses of new neighborhood amenities that you know have opened within the Promise Zone over the past year, regardless of whether Promise Zone partners were involved in their creation. Such amenities could include any of the followings: Houses of worship, public parks, bus or rail stops, non-fast food restaurants, community or recreation centers, banks, cultural arts facilities (museum or performing arts), educational facilities (including elementary/middle/secondary/adult educational center/vocational school/community college/university), government offices that serve the public, medical clinics or offices treating patients, police or fire stations, post offices, public libraries, banks, and grocery stores.

Annual Report: Using the HUD template, the Promise Zone Lead Organization shall submit an Annual Report that documents the Promise Zone's accomplishments over the previous year and lays out priorities for the next year.

Spotlights/Success Stories: Finally, Promise Zone Lead Organizations are also asked to provide one to two Spotlights or Success Stories per quarter. These spotlights will highly progress that is being made in the Promise Zone. As part of its success stories or spotlights, Promise Zones should submit photos to HUD, along with any releases or approvals needed to republish the photos.

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.

All reports will be collected electronically, via email to their HUD community liaison or using a web-based system, where possible. We are currently working with CIO to use Office 365 to use a cloud-based system to lower the reporting burden by opening up the reporting to Promise Zone lead organization to use with partners, auto-populating information and cumulatively storing information.

- **4. Duplication of Effort:** There is no duplication of effort. Information collected is unique to each type of collection and does not duplicate any similar information or method. In developing this information collection, HUD and other agencies have built upon the experience with programs in relevant policy areas that are administered by multiple agencies, including the Choice Neighborhoods, Promise Neighborhoods, Byrne Criminal Justice Innovation programs and Rural Development programs.
- **5. Impact on Small Business and Small Entities:** These information collections have no impact on small businesses or other entities.
- **6. Consequence of Less Frequent Collection:** The designated communities will benefit from the frequency of collection because the information will be shared with interagency partners to support the community priorities. Without the information, it would inhibit the ability of federal agencies to assist the Promise Zones. Information will be shared with thousands of interested communities that are doing similar place-based community revitalization work.
- 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;

One of the collections, the grant report, will be collected on a monthly interval to support the Promise Zones in learning more about grant opportunities available. If this information was collected on a quarterly basis, it would take a similar amount of burden since the information would include the same information.

- 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;

Not applicable

- 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; or 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. 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. Federal Register Notice and Public Comments:

HUD published a 60-day Notice of Proposed Information Collection for Public Comments in the *Federal Register*, Pages 47404 -47406, on July 21, 2016. The notice can be found at: <u>https://federalregister.gov/a/2016-17299</u>. There were no public comments received.

- **9. Payment/Gifts to Respondents:** No payments or gifts are provided to respondents for any of these information collections.
- **10. Assurances of Confidentiality:** Assurance of confidentiality is neither provided nor needed for any of these information collections.
- **11. Questions of a Sensitive Nature:** No sensitive questions are being asked for any of these information collections.

12. Estimate of Annual Burden Hours for Information Collection: The chart below outlines the burden associated with the various aspects of the Promise Zones initiative and a breakout of the forms associated with each portion of that burden.

Information Collection	Number of Respondent s	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Monthly Federal Grants Update	14	12	168	2	336	\$34.03	\$11,434.08
Quarterly Report: Quarterly and Annual Strategic Plan	14	4	56	10	560	\$34.03	\$19,056.80
Quarterly Report: Non-Federal Investments	14	4	56	15	840	\$34.03	\$28,585.20
Quarterly Report: New Neighborhood Amenities	14	4	56	4	224	\$34.03	\$7,622.72
Annual Report	14	1	14	4	56	\$34.03	\$1,905.68
Public Communications materials	14	4	56	5	280	\$34.03	\$9,528.40
Total			406	40	2,296		\$78,132.88

For Promise Zones the burden hours per response total 40 hours. The total annual burden hours is estimated at 2,296 hours. The total annual cost is \$78,132.88.

- 13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).
 - The cost estimate should be split into two components: (a) a total capital and startup cost component (annualized over its expected useful life) and (b) a total operation and maintenance and 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.
 - 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 collections 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.

 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 are no start-up or additional costs to the respondents other than those reported in Item 12 above in the Burden Cost Column. The reporting system is being provided by HUD. The GS-12-1 wage was used for most collections, at \$34 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.

The development of the information collection instrument has required, in the past two years, about 10 hours a week of staff engagement. Review of information collected using this instrument will require review by about eight staff (GS-13-1 at \$40.46 per hour) on a part-time basis. This level of effort is estimated to cost an average of \$31,154.20 annually not accounting for the work required to support the Promise Zone communities outside of processing the reports and communications materials.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Monthly Federal Grants Update	14	12	168	1	168	\$40.46	\$6,797.28
Quarterly Report: Quarterly and Annual Strategic Plan	14	4	56	4	224	\$40.46	\$9,063.04
Quarterly Report: Non-Federal Investments	14	4	56	1	56	\$40.46	\$2,265.76
Quarterly Report: New Neighborhood Amenities	14	4	56	1	56	\$40.46	\$2,265.76
Annual Report	14	1	14	7	98	\$40.46	\$3,965.08
Communications materials	14	4	56	3	168	\$40.46	\$6,797.28
Total			406	17	770		\$31,154.20

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

Not Applicable

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.

Notification of final reporting and communications tools will be made via policy guidance issued to the 14 Promise Zone lead organizations. Such notifications and publication are expected to take place within two months of the final public comment period in early fiscal year 2017. The collection will take place over the course of the designation, which is 10 years from the announcement date starting in 2017. HUD will publish an annual report on the Promise Zones in beginning months of each calendar year pulling information from the previous year's annual reports and communications materials.

- **17. Expiration Date:** The OMB approval number and date will appear on the HUD-prescribed forms.
- **18. Exceptions to Certification Statement:** There are no exceptions to the certification statement identified in item 19.
- **B.** Collections of Information Employing Statistical Methods: There are no collections of information that employ statistical methods.