Supporting Statement for Paperwork Reduction Act Submissions
Appalachia Economic Development Initiative (AEDI) and Semi-Annual Reporting
OMB No: 2506-0201

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 Appalachia Economic Development Initiative is a collaborative effort among three federal agencies - the Department of Housing and Urban Development (HUD), the Department of the Treasury - Community Development Financial Institutions Fund (CDFI Fund) and the Department of Agriculture - Rural Development (USDA-RD). The purpose of the Appalachia Economic Development Initiative (AEDI) is to support local rural nonprofits and Federally Recognized Indian tribes serving the Appalachian Region for lending and investing activities in businesses lending and economic development, and for securing additional sources of public and private capital for these activities. Funding for the AEDI is provided by recaptured funds from the Rural Housing and Economic Development (RHED) grant which is authorized by the Department of Veterans Affairs(VA) and the HUD and Independent Agencies Appropriations Act, 1999 (Public Law 105-276, October 21, 1998). (See Attachment)

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. AEDI is not a new collection.

It is a revision. AEDI was created in FY2013. AEDI has a three-year grant term. Once the grant is closed out, no additional funds will be appropriated for this grant. The information collected through the annual one-time application is essential so that HUD staff may determine the eligibility, qualification, and capability of applicants to implement HUD's AEDI purpose. AEDI grantees must establish and maintain records to allow HUD to determine whether or not programs are being carried out in accordance with applicable laws and requirements and to facilitate the review and audit of grant management. The instruments to be used are:

All Instrument:		Purpose: These forms listed below are used as part of the AEDI Competition process. AEDI is competitive grant. applicants were required to complete these forms as part of the application process when they applied for the AEDI grant.
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-2990	Certification of Consistency with the RC/EZ/EC-IIs Strategic Plan	Applicant must complete this form to certify that the proposed activities/projects in this application are consistent with the strategic plan of a federally-designated. Empowerment Zone (EZs), Renewal Community (RCs), or Enterprise Community (ECs); designated by the USDA in round II (EC-IIs).
HUD-2991	Certification of Consistency with the Consolidated Plan	Applicant is required to complete this form in order to certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan.
HUD-2993	Acknowledgment of Application Receipt	This form is used to verify that the application was received by HUD by the deadline and will consider it for funding. In accordance with Section 103 of the HUD Reform Act of 1989, no information will be released by HUD regarding the relative standing of any applicant until funding announcements are made.
HUD-2994A	Grant Applicant Survey	This form is completed by the applicant to assist HUD in making sure the application process is effective.

		Information collected is used to make improvements and modifications that will improve the application process.
HUD-27300	Questionnaire for HUD's Initiative on Removal of Regulatory Barriers	This questionnaire is designed to assist in the removal of regulatory barriers that make it difficult for applicants applying for housing projects in such jurisdictions and counties.

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.

   Since FY2005, HUD has required applicants to submit applications electronically through Grants.gov. Data such as semi-annual reports will continue to be submitted in paper form.

   The collection of information for this program involves the use of grants.gov and HUD's e-mail system. ORHED received applications through grants.gov. ORHED receives program reports (semi-annual reports (narrative reports and HUD-425 Financial reports) via HUD's e-mail system. No other automated, electronic, mechanical, or other technological collection techniques or other forms of information technology is use to collect information for this program.

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.

   No duplication of efforts is caused by this collection. The data collected by the forms included in item 2. is necessary because ORHED does not have any systems or other information sources within the program office that provides or collects duplicate information collected via the forms included in Item 3. There is currently no similar information available that can be used or modified for use for the purposes described in Item 2 above.

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 collection of required information is provided by the grantees which include Indian Tribes and nonprofit organizations. Small businesses and small entities are the beneficiaries of program activities. the collection of information does not have a direct impact on small businesses or other small entities does not adversely impact small businesses 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.

   Under the HUD Reform Act of 1989, discretionary funds must be awarded on a competitive basis. Without collecting this information funds could not be awarded. Program data will be provided to ORHED on a semi-annual basis as outlined in the grant agreement. The information collected through forms included in Item 3 are required in order for applicants to meet eligibility requirements for Data will be collected on an annual basis. Data collection was conducted on one-time annual basis. If the collection is not conducted, the applicant will not meet eligibility requirements to receive Federal funding.

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; **Not Applicable.**
   - 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.**

There are no special circumstances that would cause any information collection to be conducted in a manner as explained in the Special Instruction. Generally, federal grant administration requirements of 2 CFR Part 200 address the maintenance of the appropriate files.

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. Not Applicable.

   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.

   This information collection was announced in the Federal Register, Volume 82; Page 17027, on April 7, 2017. In response to the Proposed Information Collection, HUD received no comments.

9. Explain any payments or gifts to respondents, other than re-enumeration of contractors or grantees.

   Information collection does not involve any payments or gifts to respondents other than re-enumeration of contractor or grantee.

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

    Submissions are covered by the Privacy Act. Information that may be released under the Freedom of Information Act will be released in accordance with the mandates of that Act.

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.

    The information collected does not include information on specific individuals benefiting from the AEDI. There are no sensitive questions being asked.

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

Estimated Burden:

Instruments	Respondents	Annual responses	Total responses	Burden per response	Total annual hours	Hourly Rate**	Burden cost per instrument
HUD-424CB	50	1	50	2.60	130.00	$31.82	$4,136.60
HUD-424CBW-I	50	1	50	3.20	160.00	$31.82	$5,091.20
HUD-2990	50	1	50	0.00	0.00	$00.00	$00.00
HUD-2991	50	1	50	0.00	0.00	$00.00	$00.00
HUD-2993	50	1	50	0.00	0.00	$00.00	$00.00
HUD-2994A	50	1	50	0.50	25.00	$31.82	$795.50
HUD-27300	50	1	50	3.00	150.00	$31.82	$4,773.00
Total				9.30	**465.00**	**$31.82**	**$14,796.30**

The average hourly rate for Program Managers ($31.82) is based on the average hourly rates for Administrative Services Managers (Source: Bureau of labor Statistics, May 2016 National Occupational Employment and Wage Estimates.)

Annualized Cost @ $31.82/hr: **$14,796.30**

Explanation of burden hours: Number of responses is based on number of eligible applicants under the AEDI proposed guidelines. The chart above reflects the application forms that are included in each application submitted for review.

The estimated burden data included in the chart above is based on fifteen RHED competitions. AEDI was created from recaptured funds from the RHED appropriations. The RHED competition process as well as estimated burden calculations process served as the model for the AEDI competition and burden hours' estimation.

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 start-up 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**. Cost estimates are not expected to vary widely.**
- 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 additional costs other than those shown in #12.

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 annualized cost to the Federal Government for a review of AEDI applications, selection of grant recipients, and administration of oversight of the grants is an hourly estimated at $14,926.40. The details are provided below.

Employee Grade	Hourly Rates	Hourly Rate x 80 hours (2 weeks)
GS 13-4	$ 49.96	$3,996.80
GS 14-4	$ 59.04	$4,723.20
GS 15-10	$ 77.58	$6,206.40
TOTAL		**$14,926.40**

Program is scheduled to expire FY2018. NOFA published in FY2014. Although these grants are due to expire at the end of FY2018, program activity will not be completed. Due to the nature of these grants, some grantees will not complete program activities by the grant expiration date and will request a grant period extension. Grantees conduct program activities in target areas that present special program challenges often impact the grantee's capacity to complete program activities within the original grant period. ORHED will extend the grant period up to one additional year beyond the expiration if the grantee provides sufficient justification for the delay. A renewing of this collection is necessary to ensure that collection of information beyond the original grant expiration date meets PRA requirements.

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 reinstatement with change of a previously approved collection. The employee wage rate was changed to reflect the current 2017 salary table; therefore, these changes are applicable to items 13 and 14. HUD Burden hours for the collection has been decreased because HUD-27061fomr has been removed from the collection. This data will not be collected for this project.

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.

The AEDI NOFA was published September 4, 2014. The closing date of the AEDI NOFA was November 3, 2014. The AEDI awards were announced and published October 7, 2015. The grant period for the AEDI project is FY2015 thru FY2018. The AEDI grant will not exist as a grant after 2018 due to the fact that this grant was a one-time only grant funded by recaptured funds from the RHED program.

Results of the AEDI grantees will be accessible on the HUD website in the form of a list of awardees.

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.

Expiration date for OMB approval will be displayed.

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 exceptions to the certifications.

B. Collections of Information Employing Statistical Methods

No statistical methods will be used.