# **Paperwork Reduction Act Submission**

Please read the instruction before completing this form. For additional forms or assistance in completing this forms, contact your agency's Paperwork Reduction Officer. Send two copies of this form, the collection instrument to be reviewed, the Supporting Statement, and any additional documentation to: Office of Information and Regulatory Affairs, Office of Management and Budget, Docket Library, Room 10102, 725 Seventeenth St. NW, Washington, DC 20503.

| 1. Agency/Subagency Originating Request:<br>U.S. Department of Housing and Urban Development   | 2. OMB Control Number:<br>a. 2577-0281 b. None  |
|--|---|
| Public and Indian Housing  |   |
| 3. Type of information collection: (check one)         a.       New Collection         b.       Revision of a currently approved collection         c.       Extension of a currently approved collection         d.       Reinstatement, without change, of previously approved collection for which approval has expired         e.       Reinstatement, with change, of previously approved collection for which approval has expired         f.       Existing collection in use without an OMB control number         For b-f, note item A2 of Supporting Statement instructions.         7. Title: | <ul> <li>4. Type of review requested: (check one) <ul> <li>a. Regular</li> <li>b. Emergency - Approval requested by</li> <li>c. Delegated</li> </ul> </li> <li>5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities? <ul> <li>Yes No</li> </ul> </li> <li>6. Requested expiration date: <ul> <li>a. Three years from approval date</li> <li>b. Other (specify)</li> </ul> </li> </ul> |
| Jobs Plus Program 8. Agency form number(s): (if applicable)  |   |
| SF-424, SF-LLL, HUD 2880, HUD 2991, HUD 2993, HUD-5014   | 4, HUD 96011,   |
| <ol> <li>Keywords:<br/>Job readiness, low-income housing, public housing, Jobs Plus</li> </ol>   | s financial incentives funding grants   |
|  | <ul> <li>12. Obligation to respond: (mark primary with "P" and all others that apply with "X")</li> <li>a. Voluntary</li> <li>b. <b>P</b> Required to obtain or retain benefits</li> </ul>  |
| 13. Annual reporting and recordkeeping hour burden:         a. Number of respondents       75         b. Total annual responses       75         Percentage of these responses collected electronically       100%         c. Total annual hours requested       7472         d. Current OMB inventory       8959         e. Difference (+,-)       -1,487         f. Explanation of difference:       17 percent decrease in burden   | b. Total annual costs (O&M) \$0.00<br>c. Total annualized cost requested \$0.00<br>d. Current OMB inventory \$0.00<br>e. Difference \$0.00<br>f. Explanation of difference:<br>1. Program change: 0<br>2. Adjustment: 0   |
| <ul> <li>15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X")</li> <li>a. P Application for benefits e. Program planning or managem</li> <li>b. Program evaluation f. Research</li> <li>c. X General purpose statistics g. X Regulatory or compliance</li> <li>d. Audit</li> </ul>  | a. Recordkeeping b. Third party disclosure  |
| 17. Statistical methods:       18         Does this information collection employ statistical methods?       18         ☐ Yes       ☑ No   | A Agency contact: (person who can best answer questions regarding the content of this submission)<br>Name: Jerryl Bennett<br>Phone: 202.402.4120  |

# **19. Certification for Paperwork Reduction Act Submissions**

On behalf of this Federal Agency, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9.

**Note:** The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320/8(b)(3). Appear at the end of the instructions. The certification is to be made with reference to those regulatory provisions as set forth in the instructions.

The following is a summary of the topics, regarding the proposed collections of information, that the certification covers:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities;
- (d) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) It indicates the retention periods for recordkeeping requirements;
- (g) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
  - (i) Why the information is being collected;
  - (ii) Use of the information;
  - (iii) burden estimate;
  - (iv) Nature of response (voluntary, required for a benefit, or mandatory);
  - (v) Nature and extent of confidentiality; and
  - (vi) Need to display currently valid OMB control number;
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to collected (see note in item 19 of the instructions);
- (i) It uses effective and efficient statistical survey methodology; and
- (j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in item 18 of the Supporting Statement.

| Signature of Program Official:                    | Date: |
|---|-------|
| × Sue Wilson<br>Acting Deputy Assistant Secretary |       |

| Signature of Senior Officer or Designee:   | Date: |
|--|-------|
|  |       |
|  |       |
| Colette Pollard, Departmental Reports Management Officer   |       |
| Office of Investment Strategies, Policy, and Management, Office of the Chief Information Officer |       |

#### SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS Jobs Plus Grant Competition and Program Administration

#### A. Justification

1. This request is for a revision to an existing information collection for use in HUD's competitive Jobs Plus Grant Competition and Program Administration. The information collected during the Jobs Plus Grant Competition is not expected to frequently change; therefore, HUD will only need to seek OMB approval every three years, as required by the Paperwork Reduction Act.

The Public and Indian Housing Office of Public Housing Investments is responsible for administration of the Department's Jobs Plus Initiative authorized by Title II of the Consolidated Appropriations Act of 2014, H.R. 3547, under the Public Housing Capital Fund account.

2. This is a revision to an existing collection. The information provided to HUD by the eligible applicants will be reviewed and evaluated by HUD. The information to be collected by HUD will be used to preliminarily rate applications, to determine eligibility for the Jobs Plus Grant Competition and to establish grant amounts. The Jobs Plus Grant Competition Application will be used to determine funding recipients. Grantees are required to submit reports on a quarterly and annual basis. HUD uses these reports for monitoring grantee performance after awards are made.

The purpose of a Jobs Plus program is to develop locally based approaches such as work readiness, educational advancement and financial counseling to increase earnings and advance employment outcomes among public housing residents. The goal of the program is to provide intensive employment services for residents of public housing to eliminate persistent poverty. Programs will be designed to provide work incentives, to implement employment training, placement and retention strategies, and to promote community or neighbor-to-neighbor support for work opportunities among public housing residents. Primary applicants will be Public Housing Agencies (PHAs) working in tandem with key partners including local Workforce Investment Boards (WIBs) and the One-Stop Career Centers or American Job Centers they oversee, in addition to other partnering organizations that provide supportive services to public housing residents enrolled in Jobs Plus.

Jobs Plus grants are governed by the Notice of Funding Availability (NOFA) and the Grant Agreements executed between each grant recipient and HUD. Utilizing traditional grant competition protocols, the process consists of the rating and ranking of applications on the following standard and/or specialized rating criteria:

- a. applicant capacity and experience in administering employment and training or similar programs,
- b. need or extent of the problem,
- c. quality of program or soundness of approach,
- d. leveraging of partnerships and/or other resources, and
- e. achieving results and program assessment.

Eligible applicants interested in obtaining Jobs Plus grants are required to submit applications to HUD. The application includes the submission requirements described in more detail below and the information needed from partnering organizations such local government

entities, housing authorities, employment and training agencies, workforce investment boards, TANF agencies, or nonprofits. The information provided demonstrates the applicants' plans to implement the initiative requirements, which includes the capacity of lead applicant and partners. Federal agency staff to evaluate threshold requirements will use the information to evaluate the merits of the applications.

The Department has developed several mechanisms for monitoring the successful implementation of the program in the post award phase of the grant. These mechanisms include, online quarterly reporting, online annual reporting and a yearly site implementation work plan. The monitoring information collection allows the program to identify potential problems and create early intervention strategies.

#### **Jobs Plus Information Collection**

- a. Grant Application Narrative and Forms Submitted in Response to Notice of Funding Availability (NOFAs)
- b. Post Award Submissions
- c. Grant Management
- d. Program Monitoring

HUD expects to receive upwards of 75 applications based on specific eligibility criteria for applying as described in the NOFA. Eligible applicants will be limited to PHAs that meet specific criteria for size and characteristics of certain public housing developments.

- **a.** *Narrative and Forms* Each PHA will submit a narrative program proposal and a description of how the program and agency meet HUD's selection criteria, in addition to providing an agency budget and standard and program specific forms identified below.
  - 1. **Form SF-424, Application for Federal Assistance**. This is a once a year submission for agencies requesting grant funding.
  - 2. **Form SF-LLL, Disclosure of Lobbying Activities**. Once a year submission for agencies requesting grant funding.
  - 3. **Form HUD-2880, Applicant/Recipient Disclosure Update Report**. Once a year submission for agencies requesting grant funding (2510-0011).
  - 4. **Form HUD-2991, Certification of Consistency with Consolidated Plan.** Once a year submission for agencies requesting grant funding.
  - 5. **Form HUD-2993, Acknowledgement of Application Receipt.** Once a year submission for agencies requesting grant funding (2577-0259).
  - 6. **Form HUD-50144, Summary Jobs Plus Summary Budget.** This is a once a year submission for agencies requesting grant funding.
  - 7. **Form HUD 424 CB, Grant Application Detailed Budget.** This is a once a year submission for agencies requesting grant funding (2501-0017).

In addition to the previously mentioned forms, the Jobs Plus NOFA requires a qualitative narrative for each of the rating factors in the NOFA as identified below.

**Map of Proposed Site.** All applicants must include a map showing the layout of the proposed site to be served.

Signed MOU between PHA and WIB. The required MOU between the PHA and the

WIB/One-Stop must be specific to Jobs Plus and must be dated between the publication

date and due date of the Jobs Plus NOFA.

Match/Leverage Commitment Letters. Commitments beyond 25% will be considered

Leverage which may be provided as a cash or in-kind donation. All agencies

listed as providing match/leverage are required to provide a detailed letter on agency

letterhead attesting to match/leverage signed by a person authorized to make the

commitment.

**Rating Factor 1** – Capacity of the Applicant and Experience in Administering Employment and Training or Similar Programs

**Rating Factor 2** – Need / Extent of the Problem

Rating Factor 3 – Soundness of Approach or Quality of Program

**Rating Factor 4** – Leveraging of Partnerships and/or Other Resources

**Rating Factor 5-- Bonus Points PSS/PZ Documentation** 

- **b.** Post Award Submissions. Applicants are required to develop and maintain a written code of conduct in accordance with 2 CFR 200.112 and 200.318.
- c. *Grant Management* Each PHA will submit performance reports for their programs.
  - 1. **Performance Reports**. Grantees are required to submit quarterly and annually.
  - 2. Workplan Submission. Grantees are required to submit annually.
  - 3. Form SF-425, Federal Financial Report. Grantees are required to submit annually.
  - 4. Form SF-269-A, Final Financial Status Report.

**d.** *Program Monitoring* - Applicants that receive grant funds are required to report to HUD quarterly on their progress, enabling HUD to manage and monitor the programs. The information collection also covers the data needed to fulfill this reporting requirement. This information collection is automated to improve data quality and to reduce the public reporting burden. Since FY 2005, the Department has required applications prepared in response to NOFAs to be submitted electronically via Grants.gov. Jobs Plus grantee quarterly reporting is electronic.

3. All applicants, unless granted a waiver, must submit grant applications electronically to HUD via the www.grants.gov web site. This does not necessarily reduce the reporting burden as the information required for submission is the same as that required when paper applications were submitted. However, the forms used to collect this information have been converted to an electronic format which may make it easier for applicants to use and less burdensome to submit.

- 4. To avoid duplication of information, the application has been streamlined, with each data element collected only once, stored in a database, and placed in all appropriate sections of the application. Without the information gathered in these forms, the Department would not be able to fully evaluate applicants' capacity to run an effective program and administer federal funds.
- 5. Efforts were made to minimize the burden placed on all applicants, while at the same time ensuring that sufficient information would be provided to allow HUD to determine and select the best proposals.
- 6. All information collected is used to carefully consider applications for funding; if HUD collects less information, or collected it less frequently, the Department could not determine the eligibility of applicants for grant funds and applicants would not be eligible to receive funding for that fiscal year.
- 7. The following responses address special circumstances that would cause these information collections to be conducted in a manner:
  - requiring respondents to report information to the agency more 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 than can be generalized to the universe of the study;

## Not Applicable

• requiring the use of 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 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.
   Not Applicable
- 8. Updated information to be provided: [HUD published a Notice of Proposed Information Collection for Public Comments in the *Federal Register*, Volume 82; No. 195, Page 47240, on

October 11, 2017. The public was given until December 11, 2017, to submit comments on the proposed information collection. HUD received no comments on this proposed collection.

- 9. No payments or gifts are provided to respondents for any of these information collections.
- 10. Assurance of confidentiality is neither provided nor needed for any of these information collections.
- 11. No sensitive questions are being asked for any of these information collections.
- 12. The following chart outlines the burden to respondents associated with the various aspects of the Jobs Plus grant program and a breakout of the forms associated with each portion of that burden. Jobs Plus burden hours per response total 99 hours. The total burden hours are estimated at 7472 hours.

| Information<br>Collection  | Number of<br>Responde<br>nts | Respons<br>es per<br>Year | Total<br>Annua<br>I<br>Respo<br>nses | Estima<br>ed<br>Burder<br>Hours<br>per<br>Respor<br>se | Total<br>Hours | Hourl<br>y Cost | Annual<br>Cost |
|--|------------------------------|---------------------------|--------------------------------------|--|----------------|-----------------|----------------|
| GRANT<br>APPLICATIONS  |                              |                           |                                      |  |                |                 |                |
| SF-424<br>Application for<br>Federal<br>Assistance (2501-<br>0017)                   |                              |                           |                                      |  |                |                 |                |
| SF-LLL- Lobbying<br>(0348-0046)  |                              |                           |                                      |  |                |                 |                |
| HUD-2880<br>Applicant<br>Disclosure (2510-<br>0011)                                  | 75.00                        | 1.00                      | 75.00                                | 0.17   | 12.75          | 42.00           | 535.50         |
| HUD-2991<br>Certification of<br>Consistency with<br>Consolidated Plan<br>(2506-0112) | 75.00                        | 1.00                      | 75.00                                | 0.25   | 18.75          | 42.00           | 787.50         |

| HUD- 2993<br>Acknowledgement<br>of Application<br>Receipt (2577-<br>0259) | 75.00 | 1.00 | 75.00 | 0.50  | 37.50       | 42.00 | 1,575.00  |  |
|---|-------|------|-------|-------|-------------|-------|-----------|--|
| Map of Proposed<br>Site   | 75.00 | 1.00 | 75.00 | 0.25  | 18.75       | 42.00 | 787.50    |  |
| Signed MOU<br>between PHA and<br>WIB                                      | 75.00 | 1.00 | 75.00 | 2.00  | 2.00 150.00 |       | 6,300.00  |  |
| Match/Leverage<br>Commitment<br>Letters                                   | 75.00 | 1.00 | 75.00 | 14.00 | 1,050.00    | 42.00 | 44,100.00 |  |
| Rating Factor 1 –<br>Capacity   | 75.00 | 1.00 | 75.00 | 10.00 | 750.00      | 42.00 | 31,500.00 |  |
| Rating Factor 2 –<br>Need   | 75.00 | 1.00 | 75.00 | 8.00  | 600.00      | 42.00 | 25,200.00 |  |
| Rating Factor 3 –<br>Soundness of<br>Approach                             | 75.00 | 1.00 | 75.00 | 12.00 | 900.00      | 42.00 | 37,800.00 |  |
| Applicant's<br>Detailed Program<br>Budget                                 | 75.00 | 1.00 | 75.00 | 3.20  | 240.00      | 42.00 | 10,080.00 |  |
| Form HUD-<br>50144 - Summary<br>Jobs Plus Budget                          | 75.00 | 1.00 | 75.00 | 2.00  | 150.00      | 42.00 | 6,300.00  |  |
| Narrative to<br>Program Budget  | 75.00 | 1.00 | 75.00 | 4.00  | 300.00      | 42.00 | 12,600.00 |  |
| Rating Factor 4 –<br>Match/Leveraging<br>Table                            | 75.00 | 1.00 | 75.00 | 2.00  | 150.00      | 42.00 | 6,300.00  |  |

| Rating Factor 5 –<br>Bonus Points<br>Documentation<br>(HUD-2995)   | 75.00          | 1.00 | 75.00  | 0.50  | 37.50             | 42.00          | 1,575.00               |
|--|----------------|------|--------|-------|-------------------|----------------|------------------------|
| Sub-Total<br>Application<br>Submission<br>w/Narratives   | 75.00          | 1.00 | 75.00  | 59.79 | 44,115.25         | 42.00          | 185,440.50             |
| POST AWARD<br>SUBMISSIONS  |                |      |        |       |                   |                |                        |
| Code of Conduct<br>(if not on HUD<br>website, if<br>recently updated,<br>if not previously<br>submitted) | 36.00          | 1.00 | 36.00  | 1.00  | 36.00             | 42.00          | 1,512.00               |
| Sub-Total – Post-<br>Award   | 36.00          | 1.00 | 36.00  | 1.00  | 36.00             | 42.00          | 1,512.00               |
|  |                |      |        |       |                   |                |                        |
| GRANT<br>MANAGEMENT  |                |      |        |       |                   |                |                        |
|  | 36.00          | 4.00 | 144.00 | 8.00  | 1152.00           | 42.00          | 48,384.00              |
| MANAGEMENT<br>Quarterly<br>Performance   | 36.00<br>36.00 | 4.00 | 144.00 | 8.00  | 1152.00<br>864.00 | 42.00<br>42.00 | 48,384.00<br>36,288.00 |
| MANAGEMENT<br>Quarterly<br>Performance<br>Reports<br>Annual<br>Performance                               |                |      |        |       |                   |                |                        |
| MANAGEMENT Quarterly Performance Reports Annual Performance Reports Workplan                             | 36.00          | 4.00 | 144.00 | 6.00  | 864.00            | 42.00          | 36,288.00              |

| Sub-Total – Grant<br>Management | 36.00   | 1.00 | 36.00 | 24.00 | 2,592.000 | 42.00 | 108,864.00 |
|---------------------------------|---------|------|-------|-------|-----------|-------|------------|
| PROGRAM<br>MONITORING           |         |      |       |       |           |       |            |
| Monitoring and Reporting        | 36.00   | 1.00 | 36.00 | 10.00 | 360.00    | 42.00 | 15,120.00  |
| Sub-Total –<br>Monitoring       | 36.00   | 1.00 | 36.00 | 10.00 | 360.00    | 42.00 | 15,120.00  |
| Grand Totals                    | 1485.00 |      |       |       | 7403.25   | 42.00 | 31,0936.50 |

Note: The estimated hourly cost, applied when the burden cost relates to a PHA, is an estimated median hourly salary of a PHA Project Manager or other professional/managerial staff preparing grant applications.

- 13. There are no start-up or additional costs to the respondents other than those reported in Item 12 above in the Burden Cost Column. A median wage for a Project Director was used for these collections, at \$42.00 per hour.
- 14. The primary costs to the Federal Government involve the review and processing of applications, making of awards, and monitoring of grants. The review of applications will take place in HUD Headquarters. Monitoring of grantee performance is the responsibility of Headquarters staff. The estimated annualized cost to the Federal Government is based on various hourly rates indicated in the 2018 General Pay Scale for GS-12 through GS-14 level personnel, which represents Grant Administrators and other positions within the Office of Public Housing and Public Housing Investments that will fund the grants administer the program. The estimated total cost to the Federal Government is \$404,058.

| Position   |                | #        | FTE/Staff<br>Hours | Х | Hourly<br>Rate      | = | Ann<br>Cost    | ualized               |
|--|----------------|----------|--------------------|---|---------------------|---|----------------|-----------------------|
|  |                |          |                    |   |                     |   |                |                       |
| Executive  | GS-15          | 1        | 160                |   | \$73.20             |   | \$             | 11,712.00             |
| Administrator/Team Leader  | GS-14          | 1        | 480                |   | \$62.23             |   | \$             | 29,870.40             |
| Application Reviewers  | GS-13          | 10       | 120                |   | \$52.66             |   | \$             | 63,192.00             |
| MIS/Administrative Staff   | GS-13          | 2        | 240                |   | \$52.66             |   | \$             | 25,276.80             |
| Budget/Financial Staff   | GS-13          | 1        | 24                 |   | \$52.66             |   | \$             | 1,263.84              |
| Congressional/Public Affairs Staff                                 | GS-13          | 1        | 16                 |   | \$52.66             |   | \$             | 842.56                |
| Field Office Staff   | GS-12          | 8        | 1                  |   | \$44.28             |   | \$             | 354.24                |
| TOTAL  |                |          |                    |   |                     |   | \$             | 132,511.84            |
| Desition   |                | <u> </u> | FTE/Staff          | х | Hourly              |   | Ann            | ualized               |
| Position   |                | #        | Hours              | Λ | Rate                | = | Cost           |                       |
| Executive  | GS-15          | 1        | 208                |   | \$73.20             |   | \$             | 15,225.60             |
| Grant Administrator  | GS-14          | 1        | 1040               |   | <b>6</b><br>\$62.23 |   | \$             | 64,719.20             |
| GS-13 Technical Staff  | GS-13          | 1        | 240                |   | \$52.66             |   | \$             | 12,638.40             |
| Field Office Staff   | GS-12          | 16       | 260                |   | \$43.52             |   | \$             | 181,043.20            |
| TOTAL  |                |          |                    |   |                     |   | \$             | 273,626.40            |
| Grant Administrator<br>GS-13 Technical Staff<br>Field Office Staff | GS-14<br>GS-13 | 1        | 1040<br>240        |   | \$62.23<br>\$52.66  |   | \$<br>\$<br>\$ | 64,7<br>12,6<br>181,0 |

- 15. The total number of hours requested decreased by 1,487 hours (8959 7403), reflecting a twenty-one percent decrease from the previously approved PRA. The original number of annual respondents was estimated to be 125. The last three competitions indicate that 75 annual respondents are more reflective of the estimate number of annual replies to the Jobs Plus NOFA. Based on COLA increases, the annual cost decreased by \$4,6081 (\$315,545 \$310,937).
- 16. The results of this collection of information will not be published for statistical use.
- 17. No approval is sought to not display the expiration date for OMB approval of the information collection.
- 18. No exceptions.
- B. **Collection of Information Employing Statistical Methods** This information will not be collected using statistical methods.