

Supporting Statement for Paperwork Reduction Act Submission
HUD Research, Evaluation, and Demonstration Cooperative Agreements
OMB number: 2528-0299

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 of each regulation mandating or authorizing the collection of information.

Housing and Urban Developments' (HUD) Office of Policy Development and Research (PD&R) intends to establish cooperative agreements with qualified for-profit and nonprofit research organizations and universities to conduct research, demonstrations, and data analysis. HUD will issue a Notice of Funding Availability (NOFA) describing the cooperative research program and the criteria for applying for awards.

HUD's Office of Policy Development and Research is authorized to conduct Housing and Community Development research through its authorizing legislation. The statutory authority for PD&R's research activities is found in Title V of the 1970 Housing Act, which authorizes programs of "research, studies, testing, and demonstrations relating to the missions and programs of the Department." This authority is codified in the U.S. Code at 12 U.S.C. 1701z, z1-11.

The HUD Research, Evaluation, and Demonstration cooperative agreement program (HUDRD) will be established through a NOFA and will support achievement of goals and the use of strategies that were established in the *HUD's Research Roadmap*. The *Roadmap* involved broad stakeholder engagement, and HUDRD will sustain and extend this collaboration to address mutual research objectives.

Successful applicants will carry out HUDRD research activities with PD&R's engagement. These activities will be of three main types: research and evaluation, program demonstrations, and data analysis and metrics. HUDRD will be used as HUD's primary tool to undertake comprehensive evaluations and demonstration to evaluate program performance and support carefully designed experiments and quasi-experimental studies to measure the impact of current and potential programs and policies.

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.

Applicants for cooperative agreements will respond to the NOFA published in the Federal Register in order to receive an award. They must, prior to award, complete the following submissions:

- Application for Federal Assistance (Form SF-424)
- Detailed Budget (Form HUD-424-CB)

- Disclosure of Lobbying Activities, if required (Standard Form LLL)
- Disclosure/Update Report (Form HUD-2880)
- Acknowledgment of Application Receipt (Form HUD-2993)
- Client Comments and Suggestions (Form HUD-2994)

The information listed above submitted by the applicants will be evaluated as part of the selection process for award.

Following the award, cooperative agreement recipients will complete quarterly progress reports that address specific progress milestones as described in their application.

Because the structure and content is unique to the cooperative agreement, these reports will not use an existing standard form.

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. Also, describe any consideration of using information technology to reduce burden.

Applicants to the program will use the Grants.gov website in submitting applications. There will be a reduction in time and effort since all forms and related documents to apply for cooperative agreement awards will be submitted electronically.

Following the awards, all recipients will transmit progress reports and financial reports electronically as stated above as well as via email. The forms being completed and sent electronically via email are not reporting personal identifiable information on any reporting forms.

4. Describe efforts to identify duplication. Show specifically why similar information already available cannot be used or modified for use for the purposes described in Item 2. above.

No, this information is not being collected elsewhere.

The 2016 HUDRD NOFA will stipulate the eligibility for each project, identifying the type of application by responding to the factors specified for each project that can be submitted by any prospective applicant.

Following the award, the information to be collected will be used to track progress and manage the cooperative agreements. As such, this information is not available elsewhere and no duplication will occur.

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.

Applicants will include: public or private nonprofit organizations or intermediaries, including institutions of higher education and area-wide planning organizations; for profit organizations; States, units of general local government, or Indian tribes; and Public

Housing Authorities. Although some of these organizations would be considered small businesses or entities, the proposal process was developed to minimize the impact on all proposers.

Following the award, the costs of finalizing the cooperative agreement and reporting (included in another information collection application) are considered to be reimbursable expenses.

6. Describe the consequences 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.

This 2016 collection of information on the applicant submitting a proposal under the 2016 HUDRD is electronic through the grants.gov website and necessary to solicit applications under the NOFA. This reduces the burden for the potential applicants through an electronic government wide system that limits any the possibility of technical and/or legal obstacles in soliciting applications, transmitting completed applications to compete for the awards. Following the awards, reporting of information is necessary to safeguard the effective expenditure of taxpayer funds and to ensure effective performance of cooperative agreements.

If HUD is not able to collect this information HUD will not be able to comply with its statutory authority as discussed above in A. Justification.

7. Explain any special circumstances that would cause an information collection to be conducted in a specific manner.

- Under this ICR, HUD will not conduct any data collection requiring respondents to report information to the agency more often than quarterly;
- Under this ICR, HUD will not conduct any data collection requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- Under this ICR, HUD will not conduct any data collection requiring respondents to submit more than an original and two copies of any document;
- Under this ICR, HUD will not conduct any data collection requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- Under this ICR, HUD will not conduct any data collection 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;
- Under this ICR, HUD will not conduct any data collection requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- Under this ICR, HUD will not conduct any data collection 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

- Under this ICR, HUD will not conduct any data collection 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.

Applications will be processed through Grants.gov which provides for alternative methods of information collection.

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, as required by 5 CFR 1320.8(3), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and actions by the agency.**

The 60-day notice was published in the Federal Register on May 16, 2017. No comments were received.

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

There will be no payment or gift to applicants for the cooperative agreements.

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

All HUD staff members assigned to evaluate applications are subject to Section 103 of the HUD Reform Act. The section, entitled "Prohibitions Against Advance Disclosures of Funding Decisions" imposes civil and other sanctions on employees found to have improperly disclosed information submitted in an application. Applicants and grantees may identify specific sections of their applications that they claim to be protected as confidential or proprietary information. Certain aspects of a recipient's reports may not be released if they are determined to possess confidential or proprietary information. Applications not otherwise protected may be released under the Freedom of Information 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.**

No questions of a sensitive nature are asked during either the application or post-award process.

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

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Cost
Respondents Pre Award Hours	18.00	1.00	18.00	66.50	1,197.00	\$50.37	\$60,292.89
Post Award Quarterly Reports	10.00	4.00	40.00	4.00	160.00	\$50.37	\$8,059.20
Post Award Other Reports	10.00	1.00	10.00	4.00	40.00	\$50.37	\$2,014.80
Post Award Recordkeeping	10.00	1.00	10.00	16.00	160.00	\$50.37	\$8,059.20
Total	48.00	7.00	78.00		477.00		\$78,426.09

The total hour burden in the first year is estimated at 1,557 hours (1,197 for all applicants plus 360 for actual awardees' first year reporting requirements). In subsequent years, this decreases to 360 hours per year for the recipients' ongoing reporting burden.

For the application part of the NOFA process, the total number of burden hours is estimated to be 1,197 hours annually for the application process. The written proposal is estimated to require 66.5 hours to prepare. HUD expects to receive 18 proposals. For the proposal, each applicant is estimated to spend 6.5 labor hours completing the application forms (described above) and 60 labor hours preparing a narrative describing the project. Estimates of labor burden for completing the required forms were developed on the basis of the published burdens of the forms. For the non-Form portion of the proposal, the costs include development of a detailed budget (using the HUD 424 CBW) and preparation of a comprehensive project proposal. The project proposal is expected to be approximately 20–25 pages in length and is estimated to require 60 labor hours per applicant. The estimated hourly cost per response is the median of a Social Scientist from the Bureau of Labor Statistics DC area mean hourly wage of \$50.37.

Post award approximately 10 cooperative agreements are expected to be awarded. The reporting requirement for the cooperative agreements would include a short quarterly narrative report, recordkeeping and annual FFATA Sub-Award Reporting System (FSRS), Central Contractor Registration (CCR) and Federal Awardee Performance and Integrity Information System (FAPIIS) reporting. Total annual burden hours are estimated at 360 hours, or 36 hours annually for each of 10 awardees. The 36 annual burden hours per awardee are based on 4 quarterly reports at 4 hours per response, other required reporting totaling 4 hours, and recordkeeping at 16 hours.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

There are no additional cost burdens for respondents or record keepers beyond the labor-cost of burden hours described in item 12 above.

14. Provide estimates of annualized cost to the Federal government.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Proposals	18.00	3.00	54.00	8.00	432.00	\$60.83	\$26,278.56
Agreements	10.00	4.00	40.00	4.00	160.00	\$53.68	\$8,588.80
Total	--	--	--	--	-	—	\$34,867.36

Approximately 18 applications are expected to be received for the NOFA. Each application will be reviewed by three people (average grade GS14 step 5, at \$60.83 per hour in the Washington area). Each full proposal requires the individual reviewers approximately 8 labor hours to process and review. The cost to the Federal government is:

$$\begin{array}{lll} 18 \text{ full proposals} * 8 \text{ hours/application} * 3 \text{ readers} & = & 432 \text{ labor hours} \\ 432 \text{ labor hours} * \$60.83 \text{ per hour} & = & \$26,278.56 \end{array}$$

The total hours expended by Federal government employees are therefore 432 hours, and the total cost is estimated to be \$26,278.56. This portion of the total costs will only be incurred in the fiscal year that the NOFA is issued.

For ongoing monitoring and management of cooperative agreements, approximately 10 awards are expected. Quarterly reports will be reviewed by the HUD technical monitor (average grade GS14 step 1, at \$53.68 per hour in the Washington area). Each report is expected to require 4 labor hours to process and review. The cost to the Federal government is:

$$\begin{array}{lll} 10 \text{ agreements} * 4 \text{ hours/report} * 4 \text{ reports/year} & = & 160 \text{ labor hours/year} \\ 160 \text{ labor hours/year} * \$53.68 \text{ per hour} & = & \$8,588.80/\text{year} \end{array}$$

The total hours expended by Federal government employees are estimated to be 160 hours, and the total cost is estimated to be \$8,588.80. These will be ongoing annual costs for the duration of the cooperative agreements. It should be noted that similar costs are already incurred by the government through the management of similar research efforts issued through the federal contracting process. The cooperative agreement NOFA process is being implemented largely to substitute for the more cumbersome contracting process.

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

This is a reinstatement of a currently approved collection. Each year the PD&R HUDRD NOFA emphasis changes based on the research priorities that PD&R and HUD considers to be appropriate based in part on a survey, “The Research Roadmap” which incorporates the viewpoints of thousands of HUD stakeholders throughout the country. In 2016 the priority projects were: Accessible Housing and Technology Research and Technical Assistance Assessment. In 2017, the priority projects were Child Trajectories in HUD Assisted Housing and the Social and Economic Impacts of the Community Development Block Grant Program.

16. For collections of information whose results will be published, outline plans for tabulation and publications. 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 actual 2016 NOFA awards were made public, as required by the HUD Reform Act.

1. The 2016 grant period began on September 6, 2017, the grant performance period is for a three-year ending on September 6, 2020.
2. The progress reports are due on a quarterly basis as indicated quarterly with January 6th, May 6th, September 6th for each respective year under the NOFA.
3. The final reports are due 30 days prior to the end of the performance period August 6, 2020.
4. For close out the HUD review period is 30 days for approval with an end date of September 6, 2020 to officially close out the grants.

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.

HUD will display the expiration date for OMB approval for this information Collection

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

HUD does not request an exception to the certification of this information collection.

B. Collections of Information Employing Statistical Methods

N/A.