

SUPPORTING STATEMENT

U.S. Department of Housing and Urban Development Office of Lead Hazard Control and Healthy Homes

Application for Healthy Homes and Lead Hazard Control Grant Programs and Quality Assurance Plans - OMB Control #2539-0015

- 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.**

Grants are used by the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) to accomplish the public purpose of support or stimulation authorized by Federal statutes (Section 1011 of Title X of the Housing and Community Development Act of 1992; attached). The Intergovernmental Cooperation Agreement Act of 1968 was passed for the purpose of establishing coordinated administration of Federal assistance programs. As a result, the Office of Management and Budget required Federal agencies to adopt a common rule dealing with the administrative requirements for grants to State and local governments (HUD's implementing regulations are found at 24 CFR 85; administrative requirements for other organizations are found at 24 CFR 84). The documents prescribe the standard forms and procedures for award and administration of assistance instruments. Assistance instruments awarded by HUD follow these requirements in their entirety.

The OLHCHH requires information from some of its grantees and contractors on project-specific actions that will be taken to ensure the quality and validity of data that they collect and analyze. The OLHCHH specifically requires this from grantees conducting research or significant evaluation activities. This includes grantees funded under the Office's Lead or Healthy Homes Technical Studies Grant Programs and has been a requirement of grantees of other programs requiring rigorous evaluations (e.g., Asthma Interventions in Public and Assisted Multifamily Housing Programs), as well as the Office's contractors conducting research and evaluation activities under the Office's direction.

Requiring grantees and contractors to use quality assurance plan (QAP) templates to summarize their quality assurance activities helps to ensure that the activities are sufficiently thorough and well-integrated into project activities. It also standardizes the presentation of these activities, which facilitates more efficient review by OLHCHH staff.

Because HUD may disseminate findings from grant- and contract-supported research and evaluation projects, the QAP requirements help the OLHCHH to ensure adherence with the Department's Information Quality Guidelines (67 *Federal Register* 69642-69651; November 18, 2002). The Information Quality Guidelines fulfill the requirements of Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001, which requires federal agencies to issue implementing guidelines for ensuring and maximizing the quality, objectivity, utility, and integrity of information they disseminate.

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 grants must respond to the Notice of Funding Availability (NOFA) for the fiscal year published in the Federal Register in order to receive a grant award. They must complete certain of the following submissions, as in the specific NOFA:

- Form-SF 424 (OMB Approval 4040-0004)
- Form-SF 424 Suppl.(OMB Approval 1890-0014)
- FormHUD-424CBW (OMB Approval 2501-0017)
- Form HUD-27061 Race and Ethnic Data (OMB Approval 2535-0113)
- Form HUD-2880 Disclosure and Update Report (OMB Approval 2501-0011)
- Form HUD-2990 Certification of Consistency with the EZ/EC Strategic Plan
- Form HUD-2991 Certification of Consistency with the Consolidated Plan (OMB Approval 2506-0112)
- Form HUD-2993 Acknowledgment of Application Receipt
- Form HUD-96008 Benchmark Standards (36 Months) (OMB Approval 2539-0015)
- Form HUD-96009 Benchmark Standards (42 Months) (OMB Approval 2539-0015)
- Form HUD-96011 Third Party Documentation (OMB Approval 2535-0118)
- Form SF-LLL Disclosure of Lobbying Activities Required (OMB Approval 0348-0046)
- Form HUD-96012 Capacity of the Applicant and Relevant Organizational Experience (OMB Approval 2539-0015)
- Form HUD-96013 Need/Extent of the Problem (OMB Approval pending)
- Form HUD-96014 Soundness of Approach (OMB Approval 2539-0015)
- Form HUD-96015 Leveraging Resources (OMB Approval 2539-0015)
- Narrative response to the rating factors which describe the need, proposed approach, and capabilities. These rating factors are described in the NOFA.

Applicant data supplied in Form HUD-96013 section B, may be cross referenced by OLHCHH with 2010 Census data to capture housing age and tenure, as well as very low and low-income populations within the jurisdiction(s) identified by the applicant.

All grantees generally use the HUD-96008 when applying for a 36 month grant. Lead Hazard Reduction Demonstration applications may use form HUD-96009 if applying for a 42 month grant, if offered by the NOFA.

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

Applicants selected for grant award are required to prepare and submit the following forms to establish the grant program:

- Budget documents (HUD Form-424 CBW) (OMB Approval 2501-0017)
- Standard Form 1199A, Direct Deposit Sign-Up Form (OMB Approval 1510-007)
- HUD Form 27054E, eLOCCS Access Authorization Form(OMB Approval 2535-0102)

The Quality Assurance Plan reporting requirement applies to Asthma Interventions in Public and Assisted Multifamily Housing grantees, Lead Technical Studies and Healthy Homes Technical Studies grantees, and contractors that are conducting research or formal project evaluations. The submitted information is reviewed by OLHCHH staff to ensure that the implementing organizations have incorporated appropriate and sufficient quality assurance/quality control (QA/QC) procedures into their projects. This requirement helps HUD ensure the quality, objectivity, utility, and integrity of the information that is generated by these sponsored projects.

- 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 submit their applications packages through Grants.gov, an electronic submission process. The progress reports are submitted via the Internet. All of the forms are fillable and can be completed using the widely available, free Adobe Acrobat portable document file software, or the widely available Microsoft Excel spreadsheet software used in the Department's electronic grants submission process. The OLHCHH has made many of the required forms available as spreadsheets or as word processing documents for the use of applicants.

- 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.**

The NOFAs for Healthy Homes and Lead Hazard Control programs are issued on an annual basis. There are no similar programs in the Department (nor elsewhere in the Federal Government). Since the application and reporting requirements are program- and project-specific, there is no duplication. Collection of information on technical studies proposals through the QAP templates for the applicants' proposed projects is project-specific, does not duplicate any other effort and will not cause any information duplication.

- 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.**

Potential applicants to several healthy homes and lead hazard programs include not-for-profit institutions and for-profit firms located in the U.S. The NOFA includes comprehensive guidance, electronic forms, and ready-to-fill tables to facilitate responding to the NOFA.

A small business awarded a grant or contract to conduct research or formal project evaluations is required to submit a QAP (as is any other grantee). Burden reduction is reflected in the formats of the two QAP templates. The OLHCHH created the templates by streamlining existing QAP formats used by other federal agencies in order to reduce the burden on grantees and contractors, including small businesses. The Office also created separate QAP templates for Technical Studies grantees and Asthma Interventions in Public and Assisted Multifamily Housing grantees in order to reflect the different quality assurance requirements for the two types of grant programs (i.e., more information from grantees under the Technical Studies Programs because they are conducting research, which has more stringent quality requirements regarding newly

discovered types of knowledge, and less information from grantees under the Asthma Interventions in Public and Assisted Multifamily Housing Programs because they are conducting program evaluation). This appropriately reduces the burden on the small businesses and other organizations that are recipients of Asthma Interventions in Public and Assisted Multifamily Housing grants.

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.

If the solicitation for grant applications is not conducted (or is conducted less frequently), the funds appropriated for healthy homes and lead hazard grants would not be available to state and local governments, and the private sector. Under HUD's appropriations in recent years (e.g., P.L. 114-113; Consolidated Appropriations Act, 2017), non-competitive grant awards are not permitted. Under Section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001, the Department has implemented Information Quality Guidelines, which require the Quality Assurance Plan information being collected by research and program evaluation grantees and contractors.

7. Explain any special circumstances that would cause an information collection to be conducted in a specific 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 study;
Not Applicable
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
Not Applicable
- **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

The requirements for application are such that there are no conditions that would require applicants to conform to any specific method 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.**

Our notice appeared on page 43037 of volume 82 of the *Federal Register*, September 13, 2017. (<https://www.gpo.gov/fdsys/pkg/FR-2017-09-13/pdf/2017-19440.pdf>), that solicited public comment regarding this request to OMB to renew its approval concerning the Notices of Funding Availability for Healthy Homes and Lead Hazard Programs. No comments were received, but HUD OLHCHH did respond to questions about the change in the burden hours and costs.

- 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 respondents.

- 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 Housing and Urban Development Reform Act of 1989 (P.L. 101-235). That section, "Prohibitions Against Advance Disclosures of Funding Decisions," imposes civil and other sanctions on HUD employees who improperly disclose covered information during the selection process (42 USC 3537a). Applicants and grantees may identify specific sections of their applications that they claim to be protected as confidential or proprietary. Applications for grant assistance submitted to HUD will be subject to Freedom of Information Act (FOIA) requirements. "Trade secrets and commercial or financial information obtained from a person (that is) privileged or confidential" are specifically exempted from release under FOIA pursuant to 5 U.S.C. 552(b)(4). 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	Annual Cost
<u>Pre-Application Preparation</u>	80.00	1.00	80.00	24.00	1,920.00	\$47.38	\$90,969.60
<u>Full Application Preparation</u>	250.00	1.00	250.00	60.00	15,000.00	\$47.38	\$710,700.00
<u>Finalizing the Grant Award</u>	80.00	1.00	80.00	16.00	1,280.00	\$47.38	\$60,646.40
<u>Quality Assurance Plans</u>	20.00	1.00	20.00	24.00	480.00	\$47.38	\$22,742.40
Totals	250.00			60.00	18,680.00		\$885,058.40

Pre-Applications: Historically, an average of 80 pre-applications are received annually for the Healthy Homes and Lead Technical Studies Programs. The costs estimated below are based on an estimated labor rate of \$47.38 (GS-13, Step 5 equivalent, https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/GS_h.pdf).

Pre-Application Preparation: It takes each applicant approximately 24 labor hours to prepare a pre-application.

$$\begin{aligned}
 80 \text{ pre-applications} \times 24 \text{ hours/application} &= 1,920 \text{ labor hours} \\
 1,920 \text{ labor hours} \times \$ 47.38 \text{ per hour} &= \$90,969.60
 \end{aligned}$$

Applications: Historically, an average of 250 applications are received annually for all Healthy Homes and Lead Hazard Programs. The costs estimated below are based on an estimated labor rate of \$47.38 (GS-13, Step 5 equivalent).

Application Preparation: It takes each applicant approximately 60 labor hours to prepare an application.

$$\begin{aligned}
 250 \text{ applications} \times 60 \text{ hours/application} &= 15,000 \text{ labor hours} \\
 15,000 \text{ labor hours} \times \$47.38 \text{ per hour} &= \$710,700.00
 \end{aligned}$$

Finalizing the Grant Award: Following award, each of the approximately 80 grant recipient would spend approximately 16 labor hours to finalize the grant award.

$$\begin{aligned}
 80 \text{ grant recipients} \times 16 \text{ hours/recipient} &= 1,280 \text{ labor hours} \\
 1,280 \text{ labor hours} \times \$47.38 \text{ per hour} &= \$60,646.40
 \end{aligned}$$

Quality Assurance Plans: For the approximately 20 awards to Lead Technical Studies and Healthy Homes Technical Studies, Asthma Interventions in Public and Assisted Multifamily Housing Programs, and contractors conducting research and evaluation activities, preparation of the QAP takes an average of 24 hours.

$$20 \text{ responses} \times 24 \text{ hours/response} = 480 \text{ labor hours}$$

$$480 \text{ labor hours} \times \$47.38 \text{ per hour} = \$22,742.40$$

The total application and start-up cost including application preparation and, for certain grantees, QAP response, based on 18,680.00 labor hours, is \$885,058.40 per year.

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

See above 12. No start-up or operations and maintenance costs are anticipated.

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
<u>Pre-Application Review</u>	80.00	1.00	80.00	6.00	480.00	\$52.66	\$25,276.80
<u>Full Application Review</u>	250.00	1.00	250.00	10.00	2,500.00	\$52.66	\$131,650.00
<u>Negotiating the Grant</u>	70.00	1.00	70.00	4.00	280.00	\$52.66	\$14,744.80
<u>Quality Assurance Plan Review</u>	20.00	1.00	20.00	4.00	80.00	\$52.66	\$4,212.80
Totals					3,340.00		\$175,884.40

Approximately 80 pre-applications are received each year for the Healthy Homes and Lead Technical Studies Programs. Each pre-application is reviewed by two people (GS 13, step 5, \$52.66 per hour. Washington D.C. https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/DCB_h.pdf). Each application requires the individual reviewers approximately three (3) labor hours to process and review. The cost to the Federal government is:

$$80 \text{ pre-applications} \times 3 \text{ hours/application} \times 2 \text{ readers} = 480 \text{ labor hours}$$

$$480 \text{ labor hours} \times \$52.66 \text{ per hour} = \$25,276.80$$

Approximately 250 applications are received each year. Each application is reviewed by two people (GS 13, step 5, \$52.66 per hour). Each application requires the individual reviewers approximately five (5) labor hours to process and review. The cost to the Federal government is:

$$250 \text{ full applications} \times 5 \text{ hours/application} \times 2 \text{ readers} = 2,500 \text{ labor hours}$$

$$2500 \text{ labor hours} \times \$52.66 \text{ per hour} = \$131,650.00$$

Negotiation and finalizing the grant awards is expected to require 4 labor hours per grant recipient. The cost to the Federal government is:

$$70 \text{ grantees} \times 4 \text{ hours/grantee} = 280 \text{ labor hours}$$

$$280 \text{ labor hours} \times \$52.66 \text{ per hour} = \$14,744.80$$

Approximately 16 grantees and four contractors Quality Assurance Plan will be reviewed each year. Responses are reviewed by a qualified Governmental Technical Representative (GTR) or a Governmental Technical Monitor (GTM) (GS-13, Step 10/GS-14, Step 4 grade level at approximately \$60.40 per hour). Each review requires approximately 4 hours. The cost to the Federal government is:

20 respondents x 4 hrs per Quality Assurance Plan	= 80 labor hours
80 labor hours x \$60.40 per hour	= \$4,832.00

The total estimated cost to the Federal government based on an estimated 3,340 labor hours is \$175,884.40

15. Explain the reasons for any program changes or adjustments reported in Items 13 and 14.

The total respondent and Federal cost burdens have decreased significantly because of the elimination of certain application and review criteria (Rating Factors) for the the Lead Hazard Control Grant Program and Lead Hazard Reduction Demonstration Grant Program applications; there is a slight cost-of-living-based increase in the hourly wages.

16. For collections of information whose results will be published, outline plans for tabulation and publications.

The results of the 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 Department is not seeking approval to not display the expiration date on the information collection documents.

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

There are no exceptions to the certification statement.