

Supporting Statement for Paperwork Reduction Act Submissions
Human Trafficking Housing Partnership
OMB# 2506-NEW

Part A Justification

This submission is to request collection for the application submission and reporting burden associated with the Human Trafficking Housing program, a joint program between the U.S. Department of Housing and Urban Development/Office of Special Needs Assistance Programs (HUD/SNAPS) and the U.S. Department of Justice/Office of Victim Crimes (DOJ/OVC). This submission will seek to obtain approval to collect application narratives, complete all required forms for HUD/SNAPS competitive funding to the reporting burden, and report the public burden hours for anticipated number of respondents. HUD is requesting a three-year approval timeframe.

A1 Need and Legal Basis

Why is this information necessary? Identify any legal or administrative requirements that necessitate the collection.

On September 30, 2017, the U.S. Department of Housing and Urban Development/Office of Special Needs Assistance Programs (SNAPS) and the U.S. Department of Justice (DOJ)/Office of Victim Crimes (OVC) entered into an Inter-Agency Agreement (IAA) to facilitate the development of a Notice of Funding Availability (NOFA) to request applications to address specialized housing and service needs of victims of human trafficking. Through the application process, HUD/SNAPS will issue a NOFA and application package that addresses the housing and service needs of victims of human trafficking and will provide housing options with specialized services for victims of human trafficking. It is anticipated that victims of human trafficking who are provided housing and services through this process will ultimately be able to not only obtain permanent housing but remain in the permanent housing and be fully self-sufficient with stable employment once assistance from this program terminates.

The collection of information is critical to determine experience of the applicant in addressing the needs and safety of victims of human trafficking as well as their vulnerabilities, experience with the provision of housing and specialized services, and collaboration with other organizations, including local, state, and federal governments.

The legal authority for this new program falls under 22 U.S.C. 7105(b)(2), 42 USC 10603(c)(1) (A), (c)(4), and 28 U.S.C. 530C (DOJ/OVC) and Sections 501 and 502(f) of the Housing and Urban Development Act of 1970 [12 U.S.C. 1701z-1 and 1701z-2(d),(e), and (f).

HUD/SNAPS has established five standard rating factors to evaluate applications and determine whether an applicant will be awarded funding in the General Section to HUD's annual Notice[s] of Funding Availability for Discretionary Programs (General Section). Applicants applying for HUD competitive funds are required to respond to these five rating factors in narrative form. These narratives will complement budget forms located in the application package and allow HUD/SNAPS to determine if applicants are proposing projects that meet the NOFA criteria. The

five HUD standard rating factors include: Factor 1: Capacity of the Applicant and Relevant Organizational Staff Experience with Human Trafficking; Factor 2: Housing Experience and Addressing Victims of Human Trafficking; Factor 3: Supportive Services for Victims of Human Trafficking; Factor 4: Coordination with Continuums of Care and Other Organizations to Address the Needs of Human Trafficking Victims, and 5. Budget Competition to Support the Narratives. Applicants will be required to respond to each rating factor within the page limits establish in the grant solicitation

A2 Information Users

How is the information collected and how is the information to be used?

The competitive grant program includes new competitive grants. The information collection requirements pertain to grant application submission requirements which will be used to rate applications, determine eligibility, and establish grant amounts. The following additional forms will be required: SF424; SFLLL; HUD-2880; HUD-50070; Certification Regarding Lobbying; and HUD-2991. Form HUD-2991 is currently covered under OMB approval number 2506-0112.

The narratives will address the five HUD/SNAPS standard rating factors and will allow HUD/SNAPS to rate applications to determine eligibility and establish grant amounts. Applicants applying for HUD/SNAPS competitive funds are required to respond to these five rating factors in narrative form. These narratives will complement the budget forms and allow HUD to determine if applicants are proposing projects within statutory and regulatory limitations. The five HUD standard rating factors include: Factor 1: Capacity of the Applicant and Relevant Organizational Staff Experience with Human Trafficking; Factor 2: Housing Experience and Addressing Victims of Human Trafficking; Factor 3: Supportive Services for Victims of Human Trafficking; Factor 4: Coordination with Continuums of Care and Other Organizations to Address the Needs of Human Trafficking Victims, and 5. Budget Competition to Support the Narratives. Applicants will be required to respond to each rating factor within the page limits establish in the grant solicitation.

The reporting and recordkeeping requirements for the competitive grant program are also included in this approval request. Recipients will provide annual information on program accomplishments that support program evaluation and the ability to measure program beneficiary outcomes related to: maintaining housing stability; preventing homelessness; and improving access to care and support. Recipients will be required to report only on activities that have been undertaken.

A3 Improved Information Technologies

Describe whether, and to what extent, the collection of information is automated (item 13b1 of OMB form 83-i). If it is not automated, explain why not. Also describe any other efforts to reduce burden.

All competitive grant applications are submitted electronically. The applications for new competitive grants are submitted through Grants.gov.

At this time, the reporting will be utilized through a paper-based information collecting system in which annual performance data is entered into a database system after the recipient submits their report to HUD/SNAPS. Recipients will submit completed annual performance reports via email to HUD.

A4 Duplication of Similar Information

Is this information collected elsewhere? If so, why cannot any similar information already available be used or modified?

Competitive grant application information (including narratives) is only collected when applicants choose to apply for the Human Trafficking Housing Partnership competitive grant. This information is not collected elsewhere.

A5 Small Businesses

Does the collection of information impact small businesses or other small entities (item 5 of OMB form 83-i)? Describe any methods used to minimize burden.

The wide-range of applicants for funding (State governments County governments, City or township governments, Native American tribal governments (Federally recognized), Public Housing Authorities/Indian Housing Authorities, Native American tribal organizations (other than Federally recognized tribal governments), Nonprofits having a 501(c)(3) status with the IRS, other than institutions of higher education) and the need to consider all applications on an equal basis makes it difficult to give special consideration to the burden placed on small entities by the collection of information. Instead, efforts were made to minimize the burden placed on all applicants, while at the same time ensuring sufficient information will be provided to allow HUD/SNAPS to determine and select the best proposals.

A6 Less Frequent Data Collection

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.

All information collected is used to carefully consider applications for funding. If HUD collects less information, or collects less frequently, the Department will not be able to determine the eligibility of applicants for grant funds and HUD won't be able to award funding for this program.

A7 Special Circumstances

Explain any special circumstances that would cause an information collection to be conducted in a manner that would impose additional workload burden on recipients (see eight items listed in OMB guidance).

This information is being collected in a manner consistent with the guidelines in 5CFR 1320.6. There are no special circumstances that would cause an information collection to be conducted requiring:

- response more than quarterly – NA
- response in fewer than 30 days – NA
- more than an original and two copies of any document – NA
- records retention for more than three years (other than health, medical, government contract, grant-in-aid, or tax records) – NA
- statistical surveys not designed to produce results that can be generalized to the universe of study – NA
- statistical data classification not been approved by OMB – NA
- a pledge of confidentiality that is not supported by 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 – NA
- respondents to submit proprietary trade secret, or other confidential information - NA

A8 Federal Register Notice/Outside Consultation

Identify the date and page number of the Federal Register notice (and provide a copy) soliciting comments on the information. Summarize public comments and describe actions taken by the agency in response to these comments. Describe all efforts to consult with persons outside the agency.

HUD published a notice in the Federal Register to solicit public comment on April 27, 2018 in vol 83, page 18584. HUD received no comments

A9 Payment/Gift to Respondents

Explain any payments or gifts to respondents, other than remuneration of contractors or grantees.

No payment or gift to respondents is allowed.

A10 Confidentiality

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

No assurances of confidentiality are involved. The Privacy office has already reviewed and approved this document.

A11 Sensitive Questions

Justify any questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private.

This information collection does not include any questions of a sensitive nature.

A12 Burden Estimate (Total Hours and Wages)

Estimate public burden: number of respondents, frequency of response, annual hour burden. Explain how the burden was estimated.

Exhibit A-1 below demonstrates how the public burden for the Human Trafficking Housing Partnership was calculated. Approximately 20 applicants are expected to submit an application.

Estimates of public burden have been derived through program staff experience with other competitive funding.

Exhibit A-1: Estimated Annual Burden Hours for Human Trafficking Housing Partnership Application

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Human Trafficking Housing Partnership Application	20.00	1.00	20.00	8.00	160.00	\$39.07	\$6,251.20
SF-424	0	0	0	0	0	0	0
SF LLL	0	0	0	0	0	0	0
HUD-2880	20.00	1.00	20.00	0.50	10.00	\$39.07	\$390.70
HUD-50070	20.00	1.00	20.00	0.50	10.00	\$39.07	\$390.70
Certification Regarding Lobbying	20.00	1.00	20.00	0.50	10.00	\$39.07	\$390.70
HUD-2991	20.00	1.00	20.00	0.50	10.00	\$39.07	\$390.70
Code of Conduct	20.00	1.00	20.00	0.50	10.00	\$39.07	\$390.70
Subtotal	20.00	1.00	20.00	10.50	210.00	\$39.07	\$8,204.70
Annual Performance Reporting	20.00	1.00	20.00	4.00	80.00	\$39.07	\$3,125.60
Total	20.00	1.00	20.00	14.5	290.00	\$39.07	\$11,330.30

A13 Capital Costs

Estimate the annual capital cost to respondents or record keepers.

There are no additional costs to the respondents.

A14 Cost to the Federal Government

Estimate annualized costs to the Federal government.

Estimates of annualized cost to the Federal Government (clerical and professional staff time):

Application Review: 20 applications x 14.50 hour per year x \$39.07*

Total cost to the Federal Government: \$11,330.30

*this figure is based on a GS-12 salary

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SF-424	0	0	0	0	0	0	0
SF LLL	0	0	0	0	0	0	0
HUD-2880	20.00	1.00	20.00	0.50	10.00	\$39.07	\$390.70
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HUD-2991	20.00	1.00	20.00	0.50	10.00	\$39.07	\$390.70
Code of Conduct	20.00	1.00	20.00	0.50	10.00	\$39.07	\$390.70
Subtotal	20.00	1.00	20.00	10.50	210.00	\$39.07	\$8,204.70
Annual Performance Reporting	20.00	1.00	20.00	4.00	80.00	\$39.07	\$3,125.60
Total	20.00	1.00	20.00	14.50	290.00	\$39.07	\$11,330.30

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB_h.pdf

The application process is completed just one time per respondent with no additional application processes through this NOFA. This program is designed for one-time use only, meaning there will be no renewal process involved as the funding allocated to HUD through the IAA is just for the purposes of determining if this type of funding is successful for victims of human trafficking to obtain and maintain permanent housing when specialized services are provided to ensure success.

A15 Program or Burden Changes

Explain any program changes or adjustments in burden.

N/A – this is the initial submission under this program. New collection

A16 Publication and Tabulation Dates

If the information will be published, outline plans for tabulation and publication.

The results of this collection of information will not be published for statistical use.

A17 Expiration Date

Explain any request to not display the expiration date.

No approval is sought to not display the expiration date for OMB approval of information collection.

A18 Certification Statement

Explain each exception to the certification statement identified in item 19.

There are no exceptions to the signed certification