

Supporting Statement for Paperwork Reduction Act Submissions
(OMB No. 2506-new)

A. Justification

1. Why is the information necessary?

The Housing Trust Fund (HTF) program was established under section 1338 of the Federal Housing Enterprises Financial Safety and Soundness Act of 1992, as amended. In general, under the HTF program, the U.S. Department of Housing and Urban Development (HUD) allocates funds by formula to eligible states to increase and preserve the supply of decent, safe, sanitary, and affordable housing, with primary attention to rental housing for extremely low-income and very low-income households, including homeless families.

The HTF statute imposes many data collection and reporting requirements on the Department and on program participants. Information on assisted properties as well as on the owners or tenants of the properties is needed to fulfill the statutory requirements. This burden includes making the information available to HUD for monitoring the performance of the program participants and ensuring compliance with all program requirements.

The data collection elements addressed in this document are from the HTF program regulations in 24 CFR part 93.

2. What information is to be collected?

HUD requires state grantees to collect information on the activities undertaken with HTF funds.

Section § 91.320(k)(5) requires that if a grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must include in its action plan its calculation of 95 percent of the median area purchase, in accordance with the criteria and formula provided in § 93.305(a)(2).

Terminated projects are defined, at § 93.200(d), as HTF-assisted project that are terminated before completion, either voluntarily or otherwise. The grantee must repay any HTF funds invested in the project to its HTF account from which the funds were drawn (i.e., local or Treasury account), in accordance with § 93.403(b).

Section § 93.304(m) requires the grantee have and follow written policies for underwriting standards for homeownership assistance, anti-predatory lending, and refinancing loans to which HTF loans are subordinated to ensure that the terms of the new loan are reasonable.

Section § 93.350 requires documentation by grantees that HTF assisted rental housing must be affirmatively marketed by taking actions to provide information and otherwise attract eligible persons in the housing market area to the available housing without regard to race, color, national origin, sex, religion, familial status, or disability.

Section § 93.300 establishes the requirements for maximum per-unit development subsidy amounts, subsidy layering review standards and underwriting requirements.

Language at § 93.302 describes the qualifications of affordable rental housing; including tenant eligibility, rent limitations and utility allowance, periods of affordability, tenant income determination, onsite inspections, and financial oversight.

Section § 93.404 requires grantees to develop and follow written policies, procedures, and systems, including a system for assessing risk of activities and projects and a system for monitoring entities, to ensure that the requirements of Part 93 are met. While the existence of such written policies and procedures does not guarantee that a grantee's program will be compliant and efficient, HUD's monitoring has shown that the absence of or failure to follow systemic program procedures for assessing risk and monitoring participating entities is strongly correlated with poor performance and noncompliance with HUD regulations.

SF-424 and SF-425: 2 C.F.R. § 200.200 requires "the Federal awarding agency must manage and administer the Federal award in a manner so as to ensure that Federal funding is expended and associated programs are implemented in full accordance with U.S. statutory and public policy requirements, including, but not limited to, those protecting public welfare, the environment, and prohibiting discrimination. The Federal awarding agency must communicate to the non-federal entity all relevant public policy requirements, including those in general appropriations provisions, and incorporate them either directly or in the terms and conditions of the Federal award." HTF grantees are therefore required to submit the entire SF-424 family of forms as well as the SF-425 on an annual basis.

HUD Form 27055: Public Law 97-255, Financial Integrity Act, 31 U.S.C. 3512, authorizes the Department of Housing and Urban Development (HUD) to collect information which will be used by HUD to protect disbursement data from fraudulent actions. The purpose of the data is to safeguard the Integrated Disbursement and Information System (IDIS) from unauthorized access. This information will not be otherwise disclosed or released outside of HUD, except as permitted or required by law. Information requested on HUD Form 27055 is required for access to IDIS. Public Reporting burden for this information collection is estimated to average 30 minutes including time for collecting, reviewing, and reporting data.

3. Is the information submitted electronically? If not, why?

The collection of HTF program information (collection of data on funds management, project and tenant characteristics, and owner data) has been automated by IDIS. IDIS eliminates the need for grantees to submit paper reports. The submission of Action Plan related documents by grantees to the Field Office is also automated. All of the data elements of the IDIS systems and Consolidated Plan are required under Title II or related authorities.

4. Is this information collected elsewhere? Review current information collection packages for potential consolidation.

No similar information exists. The information collected through IDIS is project-specific and, therefore, unique to each grantee's HTF program. Other recordkeeping requirements (e.g., property standards, written agreements, tenant protections) are project- or program-specific and unique to local HTF programs. Documentation relating to nondiscrimination, displacement and relocation and lead-based paint are unique to individual program designs and do not result in duplication of effort.

5. 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.

There is no burden to small businesses as grantees are exclusively states. To minimize burden on small states, states can use 10% of their allocation for administration costs. Because each grant is at least \$3,000,000, that amounts to at least \$300,000 per grantee for program administration. Additionally, grantees who administer the HTF program also administer the HOME Investment Partnerships program, which uses many of the same reporting requirements and the same information and funds disbursement system.

6. Why can't the information be collected less frequently – or not at all? 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.

The information is collected on a project-by-project basis to permit grantees to draw down HTF funds from the U.S. Treasury in accordance to the HTF statute. Additional, data collected will be used to ensure that HTF funds are used for eligible purposes and comply with the HTF regulations. If the data is collected less frequently, HUD and the grantees will be potentially in violation of HTF statute and/or 2 C.F.R. Part 200, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

7. Explain any special circumstances requiring:

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

8. Date and page number of the *Federal Register* notice (provide a copy) soliciting comments and public input. Summarize any public comments and describe response to comments. Describe all efforts to consult with persons outside the agency to obtain their input.

This information collection was announced in the *Federal Register*, Volume 83 Number 129; page, 31413 on July 5, 2018. No comments have been received.

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

There have been no gifts or payments in association with this program

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

We assure confidentiality to respondents in accordance with the Freedom of Information Act (FOIA), 5 U.S.C.§. The Privacy Threshold Analysis (PTA) for this collection has been approved by the Privacy Branch.

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

There are no questions of a sensitive nature in association with this program.

12. Estimate public burden:

Regulatory Section	Information Collection	Number of Jurisdictions / Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
§ 93.100(a)	Notification of intent to participate	56.00	1.00	56.00	4.00	224.00	\$39.07	\$8,751.68
2 CFR § 200.200	Form SF-424 Family	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00
2 CFR § 200.200	Form SF-425	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00
31 USC § 3512	HUD Form 27055	56.00	1.00	56.00	0.50	28.00	\$39.07	\$1,093.96
§ 93.100(b)	Submission of Consolidated Plan	56.00	0.20	11.20	40.00	448.00	\$39.07	\$17,503.36
§ 91.220	Action Plan	56.00	1.00	56.00	10.00	560.00	\$39.07	\$21,879.20
§ 93.101	Distribution of assistance	56.00	1.00	56.00	4.00	224.00	\$39.07	\$8,751.68
§ 93.150(a)	Site and Neighborhood Standards	56.00	1.00	56.00	4.00	224.00	\$39.07	\$8,751.68
§ 93.150(b)	New rental housing site and neighborhood requirements	56.00	1.00	56.00	5.00	280.00	\$39.07	\$10,939.60
§ 93.200(b)	Establishment of terms of assistance	56.00	1.00	56.00	4.00	224.00	\$39.07	\$8,751.68
§ 93.200(d)	Terminated projects	1.00	1.00	1.00	20.00	20.00	\$39.07	\$781.40
§ 93.201(b)(2)	Establish refinancing guidelines	56.00	1.00	56.00	4.00	224.00	\$39.07	\$8,751.68
§ 93.300(a)	Establish maximum per-unit development subsidy amount	56.00	1.00	56.00	4.00	224.00	\$39.07	\$8,751.68
§ 93.300(b)	Underwriting and subsidy layering	168.00	1.00	168.00	4.00	672.00	\$39.07	\$26,255.04
§ 93.301(a)	Property standards - New construction	56.00	1.00	56.00	3.00	168.00	\$39.07	\$6,563.76

Regulatory Section	Information Collection	Number of Jurisdictions / Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
§ 93.302(b)	Establish rent limitations	56.00	1.00	56.00	4.00	224.00	\$39.07	\$8,751.68
§ 93.302(c)	Establish utility allowance	56.00	1.00	56.00	4.00	224.00	\$39.07	\$8,751.68
§ 93.302(d)(1)	Establish affordability requirements	56.00	1.00	56.00	4.00	224.00	\$39.07	\$8,751.68
§ 93.302(d)(3)	Establish preemptive procedures before foreclosure	56.00	1.00	56.00	4.00	224.00	\$39.07	\$8,751.68
§ 93.302(e)(1)	Initial income determination	1,821.00	1.00	1,821.00	1.00	1,821.00	\$39.07	\$71,146.47
§ 93.302(e)(1)	Annual income determination	5,600.00	1.00	5,600.00	0.25	1,400.00	\$39.07	\$54,698.00
§ 93.304(f)	Establish resale or recapture provisions	0.00	1.00	0.00	5.00	0.00	\$39.07	\$0.00
§ 93.304(m)(1)	Underwriting standards for homeownership assistance	0.00	1.00	0.00	6.00	0.00	\$39.07	\$0.00
§ 93.304(m)(2)	Establish policies for anti-predatory lending	0.00	1.00	0.00	4.00	0.00	\$39.07	\$0.00
§ 93.304(m)(3)	Establish reasonable refinancing for subordinated HTF loans	0.00	1.00	0.00	4.00	0.00	\$39.07	\$0.00
§ 93.305(1)	Establish modest housing guidelines	0.00	1.00	0.00	5.00	0.00	\$39.07	\$0.00
§ 93.350(a)	Nondiscrimination and equal opportunity procedures	56.00	1.00	56.00	8.00	448.00	\$39.07	\$17,503.36
§ 93.350(b)(1)	Affirmative marketing procedures	56.00	1.00	56.00	10.00	560.00	\$39.07	\$21,879.20
§ 93.351	Lead-based paint	56.00	1.00	56.00	1.00	56.00	\$39.07	\$2,187.92
§ 93.352	Displacement, relocation, and acquisition procedures	56.00	1.00	56.00	4.00	224.00	\$39.07	\$8,751.68
§ 93.353	Conflict of interest adjudication	2.00	1.00	2.00	4.00	8.00	\$39.07	\$312.56
§ 93.354	Funding Accountability and Transparency Act	56.00	12.00	672.00	1.00	672.00	\$39.07	\$26,255.04
§ 93.356(b)	VAWA notification requirements	56.00	1.00	56.00	4.00	224.00	\$39.07	\$8,751.68
§ 93.356(d)	VAWA lease term/addendum	56.00	1.00	56.00	4.00	224.00	\$39.07	\$8,751.68
§ 93.356(f)	VAWA Emergency transfer plan	56.00	1.00	56.00	4.00	224.00	\$39.07	\$8,751.68
§ 93.402(b)(1)	IDIS - Project set-up	168.00	1.00	168.00	1.00	168.00	\$39.07	\$6,563.76

Regulatory Section	Information Collection	Number of Jurisdictions / Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
§ 93.402(c)(1)	IDIS - HTF drawdowns	168.00	1.00	168.00	1.00	168.00	\$39.07	\$6,563.76
§ 93.402(d)(1)	IDIS - Project completion	168.00	1.00	168.00	1.00	168.00	\$39.07	\$6,563.76
§ 93.403(a)	Program income administration	56.00	1.00	56.00	4.00	224.00	\$39.07	\$8,751.68
§ 93.403(b)(1)	Repayment for ineligible activities	2.00	1.00	2.00	5.00	10.00	\$39.07	\$390.70
§ 93.404(b)	Written agreement	168.00	1.00	168.00	2.00	336.00	\$39.07	\$13,127.52
§ 93.404(d)(1)	Project completion inspection	168.00	1.00	168.00	2.00	336.00	\$39.07	\$13,127.52
§ 93.404(d)(2)(i)	Onsite inspection upon completion	560.00	1.00	560.00	2.00	1,120.00	\$39.07	\$43,758.40
§ 93.404(d)(2)(ii)	Onsite inspections post completion	504.00	1.00	504.00	2.00	1,008.00	\$39.07	\$39,382.56
§ 93.404(d)(2)(iv)	Project owner annual certification	168.00	1.00	168.00	2.00	336.00	\$39.07	\$13,127.52
§ 93.404(e)	Annual financial oversight of 10 or more units	168.00	1.00	168.00	2.00	336.00	\$39.07	\$13,127.52
§ 93.405	Uniform administrative requirements	56.00	1.00	56.00	4.00	224.00	\$39.07	\$8,751.68
§ 93.406 (a)	Annual CFR 200 audit	56.00	1.00	56.00	10.00	560.00	\$39.07	\$21,879.20
§ 93.407 (a)(1)	Program recordkeeping	56.00	1.00	56.00	8.00	448.00	\$39.07	\$17,503.36
§ 93.407 (a)(2)	Project recordkeeping	560.00	1.00	560.00	2.00	1,120.00	\$39.07	\$43,758.40
§ 93.407 (a)(3)	Financial recordkeeping	56.00	12.00	672.00	2.00	1,344.00	\$39.07	\$52,510.08
§ 93.407 (a)(4)	Program administration records	56.00	12.00	672.00	8.00	5,376.00	\$39.07	\$210,040.32
§ 93.407 (a)(5)	Records concerning other Federal requirements	56.00	1.00	56.00	10.00	560.00	\$39.07	\$21,879.20
§ 93.408	Performance reports	56.00	12.00	672.00	2.50	1,680.00	\$39.07	\$65,637.60
§ 93.451	Annual performance reviews	56.00	1.00	56.00	8.00	448.00	\$39.07	\$17,503.36
	TOTAL	12,186.00		14,605.20		26,247.00		\$1,025,470.29

Total cost: 26,835.00 hours * \$39.07 (Hourly rate for GS12)

13. Estimate of the average, annual cost beyond the cost of hour burden shown in Items 12.
Read the complete instructions on the form 83i.

There are no additional costs to the respondents (other than the cost shown in item 12 above)

14. Estimate annualized costs to HUD of collecting the information, including processing the information.

Regulatory Section	Information Collection	Number of Jurisdictions / Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
§ 93.100(b)	Consolidated Plan and Action Plan Review	56.00	1.00	56.00	2.00	112.00	\$46.46	\$5,203.52
§ 93.401	HTF Grant Agreement	56.00	1.00	56.00	1.00	56.00	\$46.46	\$2,601.76
§ 93.408	IDIS Program Management Reports - Field Office	56.00	12.00	672.00	14.00	9,408.00	\$46.46	\$437,095.68
§ 93.408	IDIS Program Management Reports - Headquarters	1.00	12.00	12.00	40.00	480.00	\$46.46	\$22,300.80
§ 93.451	Consolidated Annual Performance and Evaluation Report - Field Office	56.00	1.00	56.00	2.00	112.00	\$46.46	\$5,203.52
§ 93.451	Consolidated Annual Performance and Evaluation Report - Headquarters	56.00	1.00	56.00	1.00	56.00	\$46.46	\$2,601.76
	TOTAL	281.00		908.00		10,224.00		\$475,007.04
Total cost: 10,224.00 hours * \$46.46 (Hourly rate for GS-13)								

15. Explain any program changes or adjustments reported in items 13 and 14 of the OMB Form 83i.

This is the initial PRA submission for this program.

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

HUD publishes each grantee's 5 Year Consolidated Plan, Annual Action Plan, and Consolidated Annual Performance and Evaluation Report on its website. Each grantee has specific dates in which their plans are due based on the grantee program year. Upon receipt of each plan, the HUD Field Office reviews the grantee submission and then publishes the approved plan on the HUD website.

17. Explain any request to not display the expiration date.

There is no request to not display the expiration date.

18. Explain each exception to the certification statement identified in item 83i-19.

This includes, specifically, providing the required information to respondents:

There are no exceptions being requested for the certification statements.