

Supporting Statement for Paperwork Reduction Act Submissions
HUD Standardized Grant Application Forms
(OMB # 2501-0017)

A. Justification

1. In keeping with the provisions of Public Law 106-107, The Federal Financial Assistance Management Improvement Act of 1999, which requires the Federal agencies to streamline and develop common grant application requirements to ease burdens on the public, HUD supplements the Standard Form series 424 established under Circular A-102.
2. The subject information collection is required to rate and rank competitive grant applications and to ensure eligibility of applicants for funding. The Grant Application forms are the standard within the Department for submitting Application for Federal Assistance, Federal Financial Assistance application budget information and Third-Party documentation. HUD's method for electronic collection of Application for Federal Assistance, Federal Financial Assistance application budget information and Third-Party documentation standardizes the format for information collection requirements for the applicants as the forms are pre-populated with data.

It provides a breakdown by specific program and Fiscal Year. It allows the collection of organization data and budget data for multiple programs and multiple Fiscal Years via an electronic application. It will be used to make the determination as to whether the proposed budget information is reasonable, allowable and allocable.

This format:

- Provides for parsing of information allowing the agency to better convert applicant data to an electronic grants management system;
 - Consolidates OMB approved versions into a single application package consisting of applicant organizational information, third-party documents and budget data forms for electronic submission for all competitive grant programs within the Department. Use of the budget forms will be optional for formula programs and mandatory for discretionary/competitive programs; and
 - Allows applicants the ability to provide organizational information, proposed budget data and third-party documents for multiple programs via the grants.gov application submission process.
3. The information collected through grant applications is submitted electronically to grants.gov. These forms may be downloaded via the the internet. Calculations are automated. This technology reduces the amount of time a respondent needs by allowing direct data input as opposed to written applications that must be mailed to the Department.
 4. The required information must be submitted on an annual basis through grants.gov due to federal requirements for each grant application. Information from a prior year cannot be used or modified for purposes described in Item 2.
 5. This collection does not have a significant economic impact on small businesses or entities.
 6. The Statute, regulations, and the Department's grant application processes all mandate application selection criteria and content. If application content was reduced, HUD staff's ability to select those applicants most in need of funds and most capable of administering funds could be impaired.
 7. Explain any special circumstances required in the collection of the information including:
 - requiring respondents to report information to the agency more than quarterly; N/A
 - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; N/A
 - requiring respondents to submit more than an original and two copies of any document; N/A
 - requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years; N/A
 - 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; N/A
 - requiring the use of a statistical data classification that has not been reviewed and approved by OMB; N/A

- 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; N/A or
 - 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. N/A
8. This information is collected in a manner consistent with guidelines of 5 CFR 1320.8(d). The Notice Announcing the collection of information appeared in the Federal Register on Wednesday, February 27, 2019, Volume 84, No. 39, page 6434. No comments were received.
 9. No payments or gifts are provided to respondents.
 10. There is no assurance of confidentiality provided to the respondents; however, respondents are covered by the Privacy Act of 1974. The information requested under this collection is protected and held private in accordance with 5 U.S.C. 552 (Freedom of Information Act), and (Privacy Act of 1974). A Privacy Threshold Analyst was approved by the Department.
 11. The collection does not contain information of a sensitive nature about sexual behavior or attitudes, religious beliefs, or private matters.
 12. Estimated burden:

| Information Collection | Number of Respondents | Frequency of Response | Responses Per Annum | Burden Hour Per Response | Annual Burden Hours | Hourly Cost Per Response | Annual Cost |
|---|-----------------------|-----------------------|---------------------|--------------------------|---------------------|--------------------------|--------------|
| SF-424 Application for Federal Assistance | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | \$0.00 | \$0.00 |
| HUD 2880 Application/Recipient / Disclosure/Update Report | 7,500.00 | 1.00 | 7,500.00 | 2.00 | 15,000.00 | \$20.88 | \$313,200.00 |
| HUD 424 CB Grant Application Detailed Budget | 650.00 | 1.00 | 650.00 | 2.00 | 1,300.00 | \$20.88 | \$27,144.00 |
| HUD 424 CBW Grant Application Detailed Budget Worksheet | 550.00 | 1.00 | 550.00 | 3.20 | 1,760.00 | \$20.88 | \$36,748.80 |
| HUD 96011 facsimile form | 1.00 | 1.00 | 1.00 | 0.05 | 0.05 | \$20.88 | \$1.04 |
| Total | 8,701.00 | - | 8,701.00 | 7.25 | 18,060.05 | - | \$377,093.84 |

The estimated total of all grant applications in all the Department's current grant programs is approximately 8,701. The actual burden is assessed against each individual grant program submission. The hourly cost rate is based on the estimated hourly salary of a nonprofit Executive Director who may complete the forms. Data provided by https://www.payscale.com/research/US/Job=Executive_Director%2C_Non-Profit_Organization/Salary

13. There are no additional costs associated with the collection of this information.

14. The costs to the Federal government is assessed on each individual grant program submission. The estimate is based on the hourly salary of a GS-12 federal employee in the Washington, D.C. area whose job it is to review the submitted information and also includes operational expenses. Estimates are delineated in the table below.

| Information Collection | Number of Respondents | Frequency of Response | Responses Per Annum | Burden Hour Per Response | Annual Burden Hours | Hourly Cost Per Response | Annual Cost |
|---|-----------------------|-----------------------|---------------------|--------------------------|---------------------|--------------------------|--------------|
| SF-424 Application for Federal Assistance | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | \$0.00 | \$0.00 |
| HUD 2880 Application/Recipient/Disclosure/Update Report | 7,500.00 | 1.00 | 7,500.00 | 2.00 | 15,000.00 | \$39.96 | \$599,400.00 |
| HUD 424 CB Grant Application Detailed Budget | 650.00 | 1.00 | 650.00 | 2.00 | 1,300.00 | \$39.96 | \$51,948.00 |
| HUD 424 CBW Grant Application Detailed Budget Worksheet | 550.00 | 1.00 | 550.00 | 3.20 | 1,760.00 | \$39.96 | \$70,329.60 |
| HUD 96011 facsimile form | 1.00 | 1.00 | 1.00 | 0.05 | 0.05 | \$39.96 | \$1.99 |
| Total | 8,701.00 | - | 8,701.00 | 7.25 | 18,060.05 | - | \$721,679.59 |

15. This is a reinstatement of a previously approved collection. The HUD form 2880 is being added to this collection. HUD form 2880, the Applicant/Recipient Disclosure/Update Report, is required all entities applying for assistance from HUD for a specific project or activity in excess of \$200,000 during the fiscal year. The collection is removing HUD 424 Supp. Because the information is no longer collected and has been continued.
16. The information will not be published.
17. The information collection instruments will display the expiration date for OMB approval of the information collection.
18. There are no exceptions to the certification statement identified in item 19 of the OMB 83-I.

B. Collections of Information Employing Statistical Methods

There are no statistical methods used in this collection.