Supporting Statement for Paperwork Reduction Act Submissions Data Collection for the HUD Secretary's Awards OMB# 2528-XXX

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 regulation mandating or authorizing the collection of information.

HUD seeks to collect information that will be used to make the following HUD Secretary's Awards: a) The Secretary's Award for Public-Philanthropic Partnerships—Housing and Community Development in Action, b) the Secretary's Award for Healthy Homes, c) the ACHP/HUD Secretary's Award for <u>Excellence in Historic Preservation</u>, d) the American Planning Association/HUD Secretary's Opportunity and Empowerment, e) the American Institute of Architects/HUD Secretary's Housing Community Design Awards program, and f) the HUD Innovation in Affordable Housing Student Design and Planning Competition.

On an annual basis, HUD accepts nominations for the above listed awards. A common application form containing general information will streamline information collection across these six award programs. Each non-monetary award recognizes awardees for their innovation and commitment to raising industry standards in Housing and Community Development. Below is a brief description of each of the six award programs.

The Secretary's Award for Public-Philanthropic Partnerships–Housing and Community Development in Action

HUD, in partnership with the Council on Foundations, announces the HUD's Secretary's Awards for Public-Philanthropic Partnerships which recognize excellence in partnerships that have both transformed the relationships between the sectors and led to measurable benefits in terms of increased economic development, health, safety, education, disaster resilience, inclusivity and cultural opportunities, and/or housing access for low- and moderate-income families. By strengthening the connection between the HUD and philanthropy, these awards highlight the power of collective impact that can be achieved through public-philanthropic partnerships between government entities and foundations.

The Secretary's Award for Healthy Homes

HUD, through its Office of Lead Hazard Control and Healthy Homes (OLHCHH), and in partnership with the National Environmental Health Association (NEHA), recognizes excellence in making indoor environments healthier through healthy homes research, education, and through program delivery, especially in diverse, low- and moderate-income communities.

ACHP/HUD Secretary's Award for Excellence in Historic Preservation

HUD, through its Office of Policy Development and Research (PD&R) and in partnership with The Advisory Council on Historic Preservation (ACHP) recognizes developers, organizations and agencies for their success in advancing the goals of historic preservation while providing affordable housing and/or expanded economic opportunities for low-and moderate-income families and individuals.

American Planning Association/HUD Secretary's Opportunity and Empowerment Award

HUD, through PD&R and in partnership with the American Planning Association, honors excellence in community planning that has led to measurable benefits in terms of increased economic development, employment, education, or housing choice and mobility for low- and moderate-income residents. The award stresses tangible results and recognizes the planning discipline as an important community resource. The award emphasizes how creative housing, economic development, and private investments are used in, or in tandem with, a comprehensive community development plan.

American Institute of Architects/HUD Secretary's Housing Community Design Awards

HUD, through PD&R and in conjunction with the Residential Knowledge Community of The American Institute of Architects (AIA), recognizes excellence in affordable housing design, community-based design, participatory design, and accessibility. These awards demonstrate that design matters and provide examples of important benchmarks in the housing industry. Awards are offered in four categories: Community–Informed Design, Creating Community Connection, Excellence in Affordable Housing Design, and the Housing Accessibility—Alan J. Rothman Award.

HUD Innovation in Affordable Housing Student Design and Planning Competition

The Innovation in Affordable Housing Student Design and Planning Competition (IAH) is an initiative from HUD's Office of PD&R. Now entering its sixth year, the competition invites teams of graduate students from multiple disciplines to submit plans in response to a real-world affordable housing design issue.

The goals of the competition are: (1) To encourage research and innovation in affordable housing that strengthens the quality of life, social and physical fabric of low- and moderate-income communities and neighborhoods; (2) To increase practitioner capacity to produce more livable and sustainable housing for low- and moderate-income communities through best practices in building design and construction; and (3) To foster cross-cutting teamwork within the design and community development process.

The statutory authority for this data collection is authorized by Public Law 111-358, Section 105, "America Competes Reauthorization Act of 2010." Full language can be found in (Appendix B).

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.

The information collected will be used by each award program and their respective partners to determine winners for the various HUD Secretary's Awards. Winners are determined based on how well they were able to innovate and commit to raising industry standards in housing and community development.

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, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The information collected for HUD Secretary's Awards involves a web-based form because that allows for broader access and an efficient means of collecting data. Overall, a web-based form provides for a more efficient and effective review process, promotes standardization, and allows for operational efficiency.

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

The primary source of data collection will be captured through the Data Collection instrument for the HUD Secretary Awards Nomination template in (Appendix A). The template is attached and will be transmitted to HUD electronically (via web-based form). This should reduce staff time for a more expedited review.

In order to identify winners for HUD Secretary's Awards the data collected needs to come from nominators or entities who are submitting their projects; therefore, any information needed on nominators and/or entities that are applying for the awards will not be available elsewhere.

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.

This information collection will not have a significant economic impact on a substantial number of small businesses or other small entities.

6. 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.

Federal program and/or policy activities are unaffected by these awards programs.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
 - requiring respondents to report information to the agency more than quarterly;
 - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - requiring respondents to submit more than an original and two copies of any document;
 - requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
 - 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;
 - requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
 - 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
 - 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.

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320 (Controlling Paperwork Burdens on the Public). There are no special circumstances that require deviation from these guidelines.

- 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.
- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.
 - Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported.
 - Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.

On April 5, 2019, a 60-Day Federal Register Notice was published at Volume 84, No. 166, page 13710. No public comments were received.

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

No payments, remunerations, or gifts will be provided to the respondents for all the awards programs, except for in the case of the Innovation of Affordable Housing Student Design and Planning Awards. The winning team will receive a \$20,000 cash award. The runner-up team will receive a \$10,000 cash award and each of the two remaining four finalist teams each receive a \$5,000 cash award.

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

consent.

Confidentiality for all respondents is afforded in compliance with the Privacy Act of 1974.
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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to

persons from whom the information is requested, and any steps to be taken to obtain their

No questions of a sensitive nature will be included in the Data Collection instrument for the HUD Secretary Award's Nomination template.

- **12. Provide estimates of the hour burden of the collection of information.** The statement should:
 - indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices;
 - if this request covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I; and
 - provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hours per Response	Annual Burden Hours	Hourly Cost per Response	Annual Cost
The Secretary's Award for Public- Philanthropic Partnerships–Housing and Community Development in Action	50.00	1.00	50.00	3.00	150.00	\$15.92	\$2,388.00
The Secretary's Award for Healthy Homes	30.00	1.00	30.00	3.00	90.00	\$15.92	\$1,432.80
ACHP/HUD Secretary's Award for Excellence in Historic Preservation	50.00	1.00	50.00	3.00	150.00	\$15.92	\$2,388.00
American Planning Association-HUD Secretary's Opportunity and Empowerment	50.00	1.00	50.00	3.00	150.00	\$15.92	\$2,388.00
American Institute of	50.00	1.00	50.00	3.00	150.00	\$15.92	\$2,388.00

Architects/HUD Secretary's Housing and Community Design							
HUD Innovation in Affordable Housing Student Competition	50.00	1.00	50.00	3.00	150.00	\$15.92	\$2,388.00
TOTAL	280.00		280.00		840.00		\$13,372.80

Respondent	Occupation	SOC Code	Median Hourly Wage Rate
Secretary's Award Nominee	Social and Human Service Assistant	21-1093	\$15.92

All assumptions are reflected in the table above.

Source: Bureau of Labor Statistics, Occupational Employment Statistics (May 2017), https://www.bls.gov/oes/current/oes211093.htm

- 13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information (do not include the cost of any hour burden shown in Items 12 and 14).
 - The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;
 - If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
 - generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There is no additional total annual cost burden to 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. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hours per Response	Annual Burden Hours	Hourly Cost per Response	Annual Cost
The Secretary's Award for Public- Philanthropic Partnerships– Housing and Community Development in Action	50.00	1.00	50.00	6.00	300.00	\$62.23	\$18,669.00
The Secretary's Award for Healthy Homes	30.00	1.00	30.00	6.00	180.00	\$62.23	\$11,201.40
ACHP/HUD Secretary's Award for Excellence in Historic Preservation	50.00	1.00	50.00	6.00	300.00	\$62.23	\$18,669.00
American Planning Association-HUD Secretary's Opportunity and Empowerment	50.00	1.00	50.00	6.00	300.00	\$62.23	\$18,669.00
American Institute of Architects/HUD Secretary's Housing and Community Design	50.00	1.00	50.00	6.00	300.00	\$62.23	\$18,669.00
HUD Innovation in Affordable Housing Student Competition	50.00	1.00	50.00	6.00	300.00	\$62.23	\$18,669.00

TOTAL	280.00	 280.00	 1,680.00	 \$104,546.40

Approximately 280 nomination submissions are expected to be received for the HUD Secretary's Awards. They will be reviewed by three people (average grade GS14 step 5, at \$62.23 per hour in the Washington area). We estimate approximately 2 labor hours to process and review. The cost to the Federal government is:

280 HUD Secretary's Awards nominations * 2 hours/application * 3 readers = **1,680 labor hours.**

1,680 labor hours * \$62.23 per hour = **\$104,546.40**.

The total hours expended by Federal government employees are therefore 1,680 hours, and the total cost is estimated to be **\$104,546.40**.

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

There is no change in burden per agency. This is a new HUD initiative.

16. For collection of information whose results will be published, outline plans for tabulation and publication. 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 data collection is for nomination of the awards only. We do not intend to publish a report and we do not intend to use advance statistics.

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 expiration date for OMB approval will be displayed on any forms completed as part of the data collection.

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

No exceptions are necessary for this information collection.

No statistical methods will be used for the Data Collection for the HUD Secretary's Awards.