

**Supporting Statement for Paperwork Reduction Act Submissions  
Distressed Cities Technical Assistance (DCTA) NOFA  
OMB Control# 2528-NEW**

**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.**

Congress has provided the U.S. Department of Housing and Urban Development (HUD) with funding to provide technical assistance to distressed cities with small populations. In order to carry out this task in the most effective and efficient manner, HUD, in accordance with the relevant statutes and regulations, will run a competition to determine the most qualified candidate to provide that technical assistance. The information collected through responses to this Notice of Funding Availability (NOFA) is necessary to appropriately and objectively identify competition winners and manage the expenditure of grant funds.

The administrative requirements that authorize the collection of this information are contained within 2 C.F.R. Part 200, which governs grants and cooperative agreements. These regulations address activities and information that must be provided by grant applicants and awardees, as well as those actions that HUD must take, and information HUD must review, during the pre-award, award, and post-selection phases of the competition and the management of the grants.

- 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 through the responses to this NOFA will be used by HUD to run an award competition. This competition will determine the most qualified organization to provide technical assistance to help distressed communities adopt effective, efficient, and sustainable financial management practices, build capacity for financial management, economic revitalization, affordable housing, and disaster recovery, and improve knowledge of federal development programs.

Form	Title	Purpose
SF-424	This is a standard form required for use as a cover sheet for submission of pre-applications and applications and related information under discretionary programs.	This form provides applicant's contact information, EIN Number, DUNS number, amount of funds requested, and other information regarding eligibility requirements
SF-LLL	Disclosure of Lobbying Activities	Completion of this form is required to disclose lobbying activities pursuant to 31 U.S.C. 1352
HUD-2880	Applicant/Recipient Disclosure/Update Report	Applicant is required to complete this form in order to verify there are no conflicts of interest or violations of government policies with respect to receiving funds from the government.

- 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.**

HUD plans to accept applications to this NOFA through the Grants.gov platform, which has been in use since 2004. HUD routinely uses Grants.gov to accept applications to similar programs. Burden is reduced by using a well-known platform that applicants are familiar with and has been designed according to federal requirements for accessibility.

- 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.**

It is only necessary for this information to be requested once. The information requested by this NOFA is very time-specific, including the current state of applicants' capacity to do the work described in the NOFA and hard deadlines for the awarding of funds.

- 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.**

The information collected does not have a significant economic impact on small businesses.

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.

The inability to collect the information requested by this NOFA would prevent HUD from conducting a competitive award process. The NOFA requests specific information that is required to evaluate the capacity of the applicants to make effective use of HUD funds and provide quality assistance to distressed cities.

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 one special circumstance that require deviation from these guidelines. The following below are “**Not Applicable**” to this collection except for requiring respondents to report information to the agency more often than quarterly; “**Yes**”, the applicants submit invoices for reimbursement of services on a monthly basis along with monthly activity report describing the services performed.

- \* requiring respondents to report information to the agency more often than quarterly; “**Yes**”, the applicants submit invoices for reimbursement of services on a monthly basis along with monthly activity report describing the services performed.
- \* 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 that 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”**
- \* 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 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. **“Not Applicable”**

Only one of the eight bullets detailing special circumstances apply. We note here that the current document refers only to the Privacy Act as our authority, although other agencies can cite the Confidential Information Protection and Statistical Efficiency Act.

- 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 November 4, 2019, a 60-Day Federal Register Notice was published at Volume 84, No. 213, page 59411. No public comments were received.

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

Applicants and awardees do not receive gifts or any additional forms of payments outside of the terms of the award.

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

The applicants are not provided any assurances of confidentiality for this collection. The system has been certified by the government standard to handle confidential information. The Privacy Threshold Analysis (PTA) for this collection was submitted and approved. However, in the event that submitted materials are part of a response to a Freedom of Information Act request, personal information will be redacted before any documents are released.

**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 consent.**

There are no questions asked of respondents that are of a sensitive nature.

**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 Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Pre-Award							
Narrative Response to Rating Factors	10.00	1.00	10.00	40.00	400.00	\$25.00**	\$10,000.00
SF-424	---	---	---	---	---	---	---
HUD-2880 – Applicant/ Recipient Disclosure/Update Report	10.00	1.00	10.00	2.00	20.00	\$25.00**	\$500.00
SF-LLL* - Disclosure of Lobbying Activities	---	---	---	---	---	---	--
<b>Total</b>	<b>10.00</b>	---	---	<b>42.00</b>	<b>420.00</b>	<b>\$25.00**</b>	<b>\$10,500.00</b>

\*Per OMB, Standard Form should be listed, but the burden does not need to be included as part of the collection.

\*\* Assumed hourly wage for respondents.

Explanation of burden hours: Number of responses is based on number of eligible applicants under the NOFA guidelines. The table above includes the forms that are required to accompany each application submitted for review. The narrative responses consist of company background information, statements regarding capabilities, past performances, strategic objectives, accounting procedures, and other information which allow HUD to effectively measure the applicants' suitability to be awarded federally funding through the NOFA Cooperative Agreement.

**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 the applicant 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 Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Pre-Award							
Application Review	10.00	1.00	10.00	25.00	250.00	\$40.42*	\$10,105.00
Post-Award							
Work Plans	1.00	10.00	10.00	10.00	100.00	\$40.42*	\$4,042.00
Reports	1.00	4.00	4.00	8.00	32.00	\$40.42*	\$1,293.44
Recordkeeping	1.00	12.00	12.00	4.00	48.00	\$40.42*	\$1,940.16
<b>Total</b>	---	---	----	----	<b>430.00</b>	<b>\$40.42*</b>	<b>\$17,380.60</b>

- \* Basic Hourly Cost Per Response is calculated using GS-13 Step 4 @ \$40.42, which is the salary of the government employees involved in the review and subsequent monitoring of the applicants.

Applicants are reviewed by panel(s) comprised of HUD staff with relevant experience. As this program is entirely new, the estimate for the number of applicants is based on how many applications were received for the previous round of funding. The number of work plans that are created as a result of this program is also unpredictable. The estimate provided above is based on the Community Compass Technical Assistance program.

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

This is a new approval request.

**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 applications submitted will not be published. However, the name of the awardee selected will be published in the Federal Register for approximately six months after receipt of these applications.

Specific dates cannot be provided at this time, as they depend on several factors that cannot be anticipated, such as delays in the clearance process (both at HUD and at the Office of Management and Budget), potential issues with the software used to edit and publish the NOFA, delays in the appropriation of funding, etc.

After the NOFA is published publicly, respondents will have between 45 and 60 days to submit the applications. Once the application window has closed, the HUD review panel will take up to 4 weeks to review and score the applications. The Assistant Secretary of Policy Development & Research will then approve or disapprove the panel's recommendation and the selection process will be completed.

**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.**

There is no request to prohibit the displaying the expiration date.

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

There is no exception to the certification statement. Even if no forms are used to collect the information, respondents must be provided this information. Be prepared to explain how this requirement is met.

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**B. Collections of Information Employing Statistical Methods**

No statistical methods will be used to study applicants for this license.