

Supporting Statement for Paperwork Reduction Act Submissions
OneCPD Technical Assistance and Capacity Building Needs Assessment
OMB No. 2506-0198

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.

2 CFR 200 – Uniform Administrative Requirements, Cost Principles, and Audit requirements for Federal Awards.

The Technical Assistance Division uses the Needs Assessment (NA) to collect key information about a HUD grant status and grantee performance on their grant award to identify capacity gaps and inform subsequent technical assistance. The information collected provides the opportunity for the technical assistance (TA) provider to assess the technical assistance need and gaps in capacity of HUD grantees and customers to better inform technical assistance response to ensure the grantee will improve holistically and sustainably to ensure appropriate return on tax payer investment from the TA.

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 goal of the Needs Assessment is to assess the capacity of HUD grantees and their subrecipients to manage their HUD-funded programs effectively and to 1) exercise prudent financial management over their funds and 2) provide proper oversight and guidance to their subrecipients. The assessment will seek to determine whether the grantee staff has the skills needed to manage CPD grants and whether the delegation of work to partners is appropriate. The Needs Assessment delves into a number of performance areas (e.g., financial management, staffing and organizational roles; understanding of CPD program requirements) to determine where problems and capacity gaps lie.

The Field Office completes the initial assessment and the assigned HUD TA provider gathers information from the grantee, via phone and email contacts. The TA provider analyzes the information for a summary of findings. The information collected provides the opportunity for the technical assistance (TA) provider to assess and advise HUD of the grantee's technical assistance need and gaps in capacity. The information is used to better inform technical assistance response to ensure the grantee will improve holistically and sustainably to ensure appropriate return on taxpayer investment from the TA.

The TA provider enters the information electronically into a web site (HUD Exchange).

The Needs Assessment enhances a grantee's awareness of their functional capacity to effectively and efficiently administer and manage programs funded by HUD and

enables HUD and the TA provider to better understand the scope of assistance needed by each grantee and to target appropriate TA resources to grantees. It has been used by HUD to identify trends in TA needs across grantees and assist in prioritizing the development of tools, products and group learning activities to benefit HUD grantees and customers.

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.

Yes, the information is submitted electronically by the Field Office staff and the TA provider in a backend interface on the HUD Exchange website called the TA Portal. No paper copy or obligation to complete paperwork is required by these parties. The information is not collected elsewhere; this is unique information collected only in this capacity. The general public does not complete the Needs Assessment.

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 net loss would accrue at the local level through less effective programming and reduced grantee capacity. Further, it would also impact HUD's ability to provide TA that is appropriate and addresses the root issues at the grantee.

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 collection of information and data 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 Needs Assessment data is collected on a limited basis for HUD grantees that have demonstrated difficulty administering their awards, carrying out program activities, and/or meeting other challenges. The Needs Assessment tool is an efficient mechanism for TA providers to identify root causes of problems and to recommend technical assistance strategies. If the data is not collected through the Needs Assessment, HUD would be less able to target TA resources appropriately to best meet the needs of grantees. HUD's ability to support grantee in prudent grant management and compliant grant administration would be significantly impaired.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner: **N/A**
- * 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; or **N/A**
 - * 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. 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.

The notice was published in the Federal Register on October 31, 2019, vol 84 page 58407. No comments were received in response to the Federal Register notice.

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

Respondents 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.

No PII is collected. Grantees are not provided any assurances of confidentiality; however, information collected by TA providers is generally shared only with HUD program and field office staff on a “need to know” basis.

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
Needs Assessment	50.00	1.00	50.00	8.00	400.00	\$61.11	\$24,444.00
Total	50.00	-	-	8.00	400.00	\$61.11	\$24,444.00

Note: Information provided for grantees participating in assessment. Hourly rates based on May, 2018 Department of Labor, Bureau of Labor Statistics, National Occupational Employment & Wages Statistics, median annual wage of \$47.01 for General and Operations Manager, local government employees. Fringe costs of 30% added to all hourly rates so actual rates used were \$61.11. For DOL rates, visit https://www.bls.gov/oes/current/naics4_999300.htm#11-0000

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 no additional costs to the grantee.

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.

ANNUAL ESTIMATED LABOR COSTS FOR NEEDS ASSESSMENTS		
Respondent	Task	Cost
TA Providers	50 assessments x 48 hours X \$64.16 /hour	\$153,984.00
HUD FO	50 assessments @ 2 hours X \$57.89/hour	\$ 5,789.00
TOTAL	2,500 hours	\$ 159,733.00
Note: Hourly rates for HUD FO based on FY2019 General Schedule Pay Table, Grade 15, Step 5 (\$57.89) for Kansas City area. Hourly rates based on May 2018 Department of Labor, Bureau of Labor Statistics, National Occupational Employment & Wages Statistics, median rate of \$49.35		

for Training Manager. Fringe costs of 30% added to all hourly rates so actual rates used were \$64.16 respectively. For DOL rates, visit: http://www.bls.gov/oes/current/oes_nat.htm. For GS rates, visit: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/GS_h.pdf

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

Over the years, HUD has targeted Needs Assessments to fewer grantees, in part due to funding reductions and also because HUD field office and Program staff have worked more extensively with grantees to understand the capacity needs without implementing this assessment. Also, the time required to complete the assessment has been reduced as HUD staff and TA providers are more experienced in implementing it. These factors contribute to a significant reduction in data collection burden hours.

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 information that is submitted will not be published.

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

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

The OMB control number and expiration date; **N/A**

Why the information is being collected; **N/A**

Use of the information; **N/A**

Burden estimate; **N/A**

Nature of response (voluntary, required for a benefit, or mandatory); **N/A**

Nature and extent of confidentiality; and **N/A**

The requirement to display currently valid OMB control number. **N/A**

There is no exception to the certification statement.