

**Supporting Statement for Paperwork Reduction Act Submissions
Information Collection:**

**Surveys of Community Development Marketplace Project Inventory and Recipients and Providers
of HUD Technical Assistance and Training (OMB #2506-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.

The information about community development projects in progress and technical assistance (TA) and training outcomes will be collected from respondents on a voluntary basis. The information is necessary in order to connect community economic development practitioners and technical assistance recipients with relevant information from the Department of Housing and Urban Development (HUD) and other federal and non-federal sources more efficiently and effectively.

HUD does not typically receive information on specific projects and activities using formula grant funds before the grant funds have been expended. The Community Development Marketplace (CDM) survey requests such information in order for HUD to more accurately refer grantees and sub-grantees to useful information about best practices and eligible uses and administrative requirements during the planning and predevelopment periods, when they need such information the most. In addition, HUD will use the information to refer applicants to similar materials and information from other federal agencies and available non-federal resources. Organizing such interagency technical assistance for purposes of promoting more efficient and impactful use of Federal funds to address urban and metropolitan issues is authorized pursuant to sections 2 and 3 of the HUD Act, 42 U.S.C. 3531-32, “to assist the President in achieving maximum coordination of the various Federal activities that have a major effect upon urban community, suburban or metropolitan development; ...and to exercise leadership... in coordinating Federal activities affecting housing and urban development.”

The surveys for recipients and providers of HUD technical assistance and training (including from third-party TA providers and HUD staff-led TA) are also voluntary on the part of respondents. They are necessary to systematically gather user feedback and outcomes data to evaluate and improve HUD’s deployment and management of its technical assistance resources. This type of information on outcomes has been consistently requested by both the Office of Management and Budget (OMB) and Congressional Appropriations Committee staff, particularly on measuring the outcomes of HUD third-party technical assistance. Technical assistance and training outcomes measurement is authorized under Sec. 501 of Title V of the HUD Act of 1970, Public Law 91-609, which authorizes the Secretary “to undertake such programs of research,

studies, testing, and demonstration relating to the mission and programs of the Department as he determines to be necessary and appropriate.”

Questions about this information collection can be addressed to cdm@hud.gov.

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.

Eligible respondents interested in participating in the following surveys will be invited to complete it and submit it to HUD:

1. The CDM Project Intake Survey – New collection
2. a. HUD Direct TA Survey: TA Provider version (Outcomes Survey for Providers of Direct and On-Call HUD Technical Assistance) (TA Outcomes) – New collection
b. HUD Direct TA Survey: TA Recipients version (Outcomes Survey for Recipients of Direct and On-Call HUD Technical Assistance (TA Outcomes) provided by third-party organizations) – New collection
c. Survey for Community Partners Receiving HUD Staff-Led Technical Assistance (Outcomes Survey of Recipients of HUD Staff-Led Technical Assistance under Community Partnerships) (TA Outcomes) – New collection
3. a. HUD Training Survey: In-Person Trainings – New collection
b. HUD Training Survey: Online Trainings – New collection

TA Outcomes Evaluation data will be used by HUD to determine the effectiveness of TA services provided (by both third-party TA providers and HUD staff), whether it met intended outcomes, and to gain a better understanding of relevant issues and greatest barriers to program administration and delivery among HUD program participants. HUD Training Survey data will be used by HUD to determine the effectiveness of HUD in-class and online training services provided, whether trainings met predetermined learning objectives, and assess general customer satisfaction with HUD training.

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.

Technology applied to the collection: If HUD decides to proceed with all surveys after public comment and OMB approval, HUD may embed the surveys on max.gov, the HUD Exchange website, huduser.gov, or another online platform. The one exception is that in-person training surveys will be collected using paper surveys and provided to HUD staff

at headquarters via electronic scans; HUD staff will be responsible for any data entry associated with in-person training survey results. HUD may also continue to ask for user feedback through online suggestions and surveys on HUD Exchange or similar websites that HUD may use in the future. Hours associated with such additional feedback are included in the burden estimate. To secure additional qualitative information, HUD may follow up on surveys of TA recipients and training participants through interviews and focus groups.

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.

Duplication of Effort: There is no duplication of effort. Information collected is unique to each type of collection and does not duplicate any similar information or method.

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.

Impact on Small Business and Small Entities: These information collections have no impact on small businesses or other 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.

Consequence of Less Frequent Collection: HUD's TA targeting and evaluation process will be less transparent and lead to less efficient allocation of resources if the collection is not conducted or conducted less frequently. HUD will not be able to comprehensively analyze the assistance that is provided to communities through third-party technical assistance and training and the assistance provided to communities by HUD staff.

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.

Special Circumstances for Information Collection: There are no special circumstances that would cause these information collections to be conducted inappropriately.

1. Respondents are not required to report information to the agency more than quarterly; all collections are voluntary.
 2. Respondents are not required to prepare a written response to the collection of information in fewer than 30 days after receipt of it; all collections are voluntary.
 3. Respondents are not required to submit more than one original and two copies of any document.
 4. Respondents are not required to retain records other than health, government contract, grant-in-aid, or tax records, for more than three years. This collection has no record retention requirement.
 5. This collection of information is not a statistical survey – special circumstances related to statistical surveys are not applicable.
 6. This collection of information does not require the use of a statistical data classification.
 7. This collection of information does not include a pledge of confidentiality
 8. This collection of information does not require respondents to submit proprietary trade secrets or other confidential information. All collections of information are entirely voluntary.
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.

Federal Register Notice and Public Comments: No comments were received related to the TA and training outcomes surveys. Comments to the Community Development Marketplace Project Intake Survey and agency responses are summarized in the attached document. The Federal Register Number for the original 60-Day FR Notice is 2016-06849. The 60-Day FR Notice can be found here:

<https://www.federalregister.gov/documents/2016/03/25/2016-06849/60-day-notice-of-proposed-information-collection-surveys-of-community-development-marketplace>

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

Payment/Gifts to Respondents: No payments or gifts are provided to respondents for any of these information collections.

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

Assurances of Confidentiality: Assurance of confidentiality is neither provided nor needed for any of these information collections. Respondents to the voluntary Community Development Marketplace Project Intake Survey may provide permission to share their responses with the public.

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.

Questions of a Sensitive Nature: No sensitive questions are being asked for any of these information collections.

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.

Estimate of Annual Burden Hours for Information Collection: The chart below outlines the burden associated with the three types of information collection to improve the effectiveness of technical assistance programs and operations and a breakout of the six survey forms associated with each portion of that burden.

The total burden hours are estimated at 5,428 hours annually. The weighted average burden per response is 0.39 hours or 23.4 minutes.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
CDM project intake survey (and follow up feedback)	332	4	1328	2.25	2988.00	\$40.46 ¹	\$120,894.48
HUD Direct TA Survey: TA Provider Version	1140	1.1 ²	1254	0.25	313.50	\$40.46 ³	\$12,684.21
HUD Direct TA Survey: Recipient Version	1140	1.1 ⁴	1254	0.25	313.50	\$28.39 ⁵	\$8,900.27
Survey of Community Partners Receiving HUD Staff-Led Technical Assistance	180	1	180	0.25	45	\$28.39 ⁶	\$1,277.55

¹ Hourly rate based off of GS-13-01 Schedule for “Rest of the U.S.” as of October 2016.

² HUD anticipates that a small percentage of TA providers will provide multiple TA engagements, and therefore be asked to complete two surveys.

³ Hourly rate based off of GS-13-01 Schedule for “Rest of the U.S.” as of October 2016.

⁴ HUD anticipates that a small percentage of TA recipients will receive multiple TA engagements, and therefore be asked to complete two surveys.

⁵ Hourly rate based off of GS-11-01 Schedule for “Rest of the U.S.” as of October 2016.

⁶ Hourly rate based off of GS-11-01 Schedule for “Rest of the U.S.” as of October 2016.

HUD Training Survey: In Person Trainings	3500	1.3 ⁷	4550	0.16	728	\$23.46 ⁸	\$17,078.88
HUD Training Survey: /Online Trainings	5000	1.3 ⁹	6500	0.16	1040	\$23.46 ¹⁰	\$24,398.40
Totals	11,292	9.8	15,066	3.32	5,428	\$184.62	\$185,233.79

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.

Cost Burden of Information Collection: There are no start-up or additional costs to the respondents other than those reported in Item 12 above in the Hour Burden Cost Column.

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

⁷ HUD anticipates that approximately 30% of in person trainees will complete multiple trainings, and therefore be asked to complete more than one survey.

⁸ Hourly rate based off of GS-09-01 Schedule for "Rest of the U.S." as of October 2016.

⁹ HUD anticipates that approximately 30% of online trainees will complete multiple trainings, and therefore be asked to complete more than one survey.

¹⁰ Hourly rate based off of GS-09-01 Schedule for "Rest of the U.S." as of October 2016.

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.

Annualized Cost to Federal Government: The development of all information collection instruments will require, in its initial year, approximately two full-time equivalent positions plus part-time contractor engagement from two firms with TA evaluation and website organization expertise.

HUD Employees: (2) GS-13 FTE (\$40.46/hr¹¹) for 52 weeks (2087 hours each) = **\$168,880.04**

Contractor Support for TA Evaluation expertise and website/IT support: (3) Contractor employees working part-time at an average of 20 hours/week at GS-13 Level (\$40.46/hour) for 52 weeks (1040 hours) = \$42,078.40 x 3 contractor employees = **\$126,235.20**

Note: contractor support is primarily to implement the systems and development changes that will be necessary to host the surveys on online platforms.

Contractor Administrative Costs Associated with In-Person Trainings:

Printing Costs: 4,550 surveys collected per year at approximately 4 pages per survey = 18,200 pages *\$0.05/page = **\$910.00**

Administrative Support to scan or electronically record surveys and submit to HUD: (1) GS-07 FTE (\$19.18/hour¹²) for a total of 100 hours (based on an approximate total of 100 trainings and one hour of time to scan in surveys for one training, given approximately 45 surveys collected per training) = **\$1918.00**

Total annualized cost to federal government (initial year): approximately \$297,943.24

Subsequent work in the following two years related to the information collection requests will be less labor-intensive and require less FTE and significantly lower contractor support (no web development expenses). Estimated annualized cost in subsequent years is approximately 1.5 GS-13 FTE (\$40.46/hr) for 52 weeks/yr (3130.5 hrs) plus the costs of in-person training costs (printing and administrative support=\$2,828 total) or **approximately \$129,488.03 (for subsequent years)**

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

Changes or Adjustments to OMB Form 83-I: Changes have been made to Item 14 to more accurately reflect the start-up costs to HUD of implementing the survey in the

¹¹ Hourly rate based off of GS-13-01 Schedule for "Rest of the U.S." as of October 2016.

¹² Hourly rate based off of GS-07-01 Schedule for "Rest of the U.S." as of October 2016.

initial year—this relates to web development costs associated with implementing the new surveys. It also reflects adding costs associated with implementing and collecting results of in-person training surveys that will be completed on paper. No changes have been made to Item 13. In item 12, information has been given for individual surveys involved in the proposed information collections. One survey has been renamed, from Survey of HUD Training Participants (Webinar/Self-Paced) to Survey of HUD Training Participants Web-based/Online), to reflect the variation in delivery styles for online materials. In addition, the Outcomes surveys for TA have been further broken down in order to include TA delivered by HUD staff (“HUD Staff-Led TA under Community Partnerships”)

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.

Publication of Information Collection Results:

HUD intends to post for public use a searchable database made up of Community Development Marketplace Project Intake Survey response data from those respondents who specifically grant permission to share their responses with the public. This will allow respondents to find and contact peers working on similar projects, and federal and non-federal organizations providing technical assistance and other types of support to identify potential partners. A prototype of this database, using data collected from Round III Promise Zone applications, has already been posted at www.hud.gov/promisezones (follow link to the Community Development Marketplace). Information is not currently being collected as part of this prototype. HUD is currently exploring alternatives to provide an online platform for the Community Development Marketplace Project Intake Survey and will provide updates upon request. The CDM Project Intake Survey is intended to be posted online by 01/16/17. Information will be collected and published on a continuing basis thereafter.

Any publication of the results of the three TA Outcomes Evaluation surveys (for providers and recipients of provider-led and HUD staff-led technical assistance) will be aggregated and no confidential information will be shared with the general public. Reports to Congress, TA providers, and/or TA recipients may be completed on an as-needed basis. The TA Outcomes surveys are intended to go into full use by 02/16/17. The surveys will be collected on a continuing basis thereafter.

Any publication of the results of the two Surveys of HUD Training Recipients (for in-person and web-based training recipients) will be aggregated and no confidential information will be shared with the general public. Reports to Congress, training providers and instructors, and/or training recipients may be completed on an as-needed basis. The Surveys of HUD Training recipients for both in-person and web-based

training recipients are intended to go into full use by 02/16/17. The surveys will be collected on a continuing basis thereafter.

None of the surveys have a target end date at this time.

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.

Expiration Date: The OMB approval number and date will appear on the HUD-prescribed forms.

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

A. **Exceptions to Certification Statement:** There are no exceptions to the certification statement identified in item 19.

B. **Collections of Information Employing Statistical Methods:** There are no collections of information that employ statistical methods.