

**Supporting Statement for Paperwork Reduction Act Submissions
Surveys of Recipients and Providers of Technical Assistance (TA) and Training
OMB Control #2528-0325**

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 (TA) and training to HUD customers, including Public Housing Authorities and Continuums of Care. The surveys in this collection of information 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 information has been requested by both the Office of Management and Budget (OMB) and Congressional Appropriations Committee staff. Technical assistance and training outcomes measurement and evaluation are authorized under Sec. 501 of Title V of the HUD Act of 1970. The surveys are voluntary on the part of respondents.

Four surveys are included in this information collection revision:

- **2 Direct TA Surveys:**
 1. Survey for recipients of TA provided by HUD TA Providers (third-party organizations)
 2. Survey for HUD TA Providers who provide the technical assistance
- **2 Training Surveys:**
 3. Survey for participants at in-person trainings conducted by HUD TA Providers
 4. Survey for participants of online trainings conducted/created by HUD TA Providers

This revision includes the following key changes from the previously-approved information collection:

- **Removal of 2 surveys:** The previously-approved information collection included the *Community Development Marketplace (CDM) Project Intake Survey* and the *Survey of Community Partners Receiving HUD Staff-Led Technical Assistance*. These surveys are no longer active and thus are not included in this information collection revision.
- **Edits to 4 remaining surveys:** For the four remaining surveys, HUD removed the requirement to provide only aggregated data to TA Providers and HUD staff. HUD also added additional questions to the two training surveys.

- 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.**

Purpose for which the information will be used: The surveys will provide HUD with user feedback and outcomes data to evaluate and improve its TA and training program. As HUD receives more data over multiple years, HUD will use the information to comprehensively evaluate the Community Compass program, identify areas for improvement in the program, evaluate the effectiveness of individual HUD TA and training engagements, identify trends in TA needs, improve the measurement of past performance for future TA Notices of Funding Availability (NOFAs), and help HUD identify risk within its TA Provider pool. Survey results are also used by TA Providers and HUD staff to improve individual TA and training engagements.

Actual use of information: Since the original collection was approved in 2017, HUD has used the survey results in a variety of ways. HUD used training survey feedback and results to evaluate risk for applicants of the FY 2018/2019 Community Compass NOFA. HUD TA Providers and Program Office staff use training survey reports to evaluate the effectiveness of trainings, make improvements to future trainings, and identify additional needs. Staff in HUD's Technical Assistance Division use survey results to help assess the performance and effectiveness of individual HUD TA Providers.

- 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 surveys are created, completed, and submitted electronically. TA Providers use the HUD User (www.huduser.gov) website to create surveys and generate/send links to surveys, and survey respondents complete surveys online by accessing the survey links on a standard web browser (e.g., Internet Explorer or Chrome). This electronic method of survey implementation was chosen for ease of use and efficiency and to reduce the burden on the involved parties. Creating and administering surveys online is less burdensome than requiring TA Providers to create surveys, print the surveys, physically administer and collect the surveys, and then manually submit (via mail or email) survey data to HUD. It is less burdensome on respondents because they can complete and submit survey responses at a time and in a place that works best for them, and there is no need to manually submit (via mail or email) hard copies of the completed surveys to the TA Provider or HUD. This electronic method also reduces printing costs.

Some HUD customers face limitations that may make it difficult to complete surveys online (e.g., remote locations that do not have high speed internet access). In those limited circumstances, HUD may choose to administer surveys on paper, but HUD will take every action to avoid the use of paper surveys. HUD anticipates that surveys will be completed and submitted on paper at no more than 15 TA/training engagements each year.

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.**

There is no duplication of effort. The information collected is unique to each collection and does not duplicate any similar information collection 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.**

This information collection does not impact 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.**

If this collection is not conducted or is conducted less frequently, HUD will not have a means to gather systematic feedback and outcomes data and thus will not be able to comprehensively analyze the TA and training that it is providing to HUD customers through the Community Compass program. This would lead to less efficient allocation of Federal resources, an inability to strategically improve the program, and a decreased effectiveness in assisting HUD's customers. Without the information collection, HUD staff and TA Providers will have less information available to them to improve individual TA and training engagements, and HUD will have a reduced ability to assess TA program risk.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**

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. The following below are "**Not Applicable**" to this collection:

- requiring respondents to report information to the agency more than quarterly – "**Not Applicable**";
- 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 than 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 – “**Not Applicable**”; 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 – “**Not Applicable**”.
- 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 60-Day Federal Register Notice for this information collection was published on January 28, 2020. The Federal Register citation is 85 FR 5012, and the notice is on pages 5012-5013.

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

No payments or gifts are provided to respondents for any of the surveys in this collection of information.

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

There are no assurances of confidentiality provided or needed for this collection. The Privacy Act of 1974 provided privacy protection to respondents.

- 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.**

The chart below outlines the burden associated with the four surveys included in this information collection. The burden is based on samples of potential respondents prior to the first information collection request in 2016, and it is supported by the observed burden since the surveys were launched in 2018.

Information Collection	Number of Respondents¹	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Provider TA Survey	1,140.00	1.10	1,254.00	0.25	313.50	44.65	13,997.78
Recipient TA Survey	1,140.00	1.10	1,254.00	0.25	313.50	32.86	10,301.61
In-Person Training Survey	3,500.00	1.30	4,550.00	0.20	910.00	32.86	29,902.60
Online Training Survey	5,000.00	1.30	6,500.00	0.20	1,300.00	32.86	42,718.00
Totals	10,780.00	--	13,558.00	--	2,837.00	--	\$96,919.99

Compared to the previously-approved information collection, the “Burden Hours Per Response” increased slightly for the In-Person and Online Training surveys due to additional questions added to those surveys. However, the total “Annual Burden Hours” and total “Annual Cost” decreased compared to the previously-approved information collection because two surveys [*Community Development Marketplace (CDM) Project Intake Survey* and the *Survey of Community Partners Receiving HUD Staff-Led Technical Assistance*] were removed from the information collection.

¹ Number of respondents is based on the frequency of TA and training engagements and the number of participants in recent years.

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 are no start-up or additional costs to the respondents other than the hourly costs reported in Item 12.

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.

The development phase reflected in the previously-approved information collection required more extensive HUD and Contractor support. Current post-development costs are considerably lower.

Employee Costs						
Type of Employee	# of Employees	Hourly Rate	Hours/Week/Employee	Weeks/Year	Total Hours/Year	Annual Cost
HUD ²	2	\$49.19 ³	5	52	520	\$25,578.80

Contractor ⁴	3	\$64.73 ⁵	2	52	312	\$20,195.76
Contractor	3	\$77.54 ⁶	2	52	312	\$24,192.48
Totals	8	--	--	--	1,144	\$69,967.04

Printing Costs ⁷					
# of Surveys	Average Pages/Survey	# of Trainings/TA Events	Total Pages	Cost of Paper (per sheet)	Total
25	7	15	2,625	\$0.06	\$157.50

Total annualized cost to Federal government: \$70,124.54

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

This submission is a revision request for approval. In this revision request, HUD made a number of changes to the previously-approved collection that impacted the overall number of respondents, total annual responses, and total annual hours reflected in Item 13 of the previous OMB Form 83-I.

- HUD removed the *Community Development Marketplace (CDM) Project Intake Survey* and the *Survey of Community Partners Receiving HUD Staff-Led Technical Assistance*, as they are no longer used by HUD. Removal of these two surveys reduced the number of respondents by 512, reduced the total annual responses by 1,508, and reduced the total annual hours by 3,033.
- HUD increased the Burden Hours Per Response for both the in-person training survey and the online training survey from 0.16 Burden Hours Per Response to 0.20 Burden Hours Per Response. This increase reflects additional information requested in each survey, including the identification of other trainings needed by the respondent and identification of the organization type for Office of Native American Programs training respondents. The increase in Burden Hours Per Response for these two surveys increased the annual response hours for the in-person training survey by 182 hours and increased the annual response hours for the online training survey by 260 hours.

² The information in this chart is based on the current workload of the DC-based HUD Headquarters employees in charge of the survey project.

³ Hourly rate based on GS-13-01 Schedule for "WASHINGTON-BALTIMORE-ARLINGTON, DC-MD-VA-WV-PA" as of March 2020.

⁴ Contractor support is primarily used to maintain and enhance the electronic platforms that are used to create and distribute the surveys. The information in this chart is based on the current workload of the contractor employees that work on the surveys.

⁵ 90 percentile hourly wage for "Computer Programmers" from the Bureau of Labor Statistics (May 2018) <https://www.bls.gov/oes/current/oes151131.htm>.

⁶ 90 percentile hourly wage for "Software Developers, Applications" from the Bureau of Labor Statistics (May 2018) <https://www.bls.gov/oes/current/oes151132.htm>.

⁷ The surveys are designed to be created, completed, and submitted online. However, in unique and extreme circumstances (e.g., in locations where respondents do not have sufficient internet access to complete the surveys online), HUD may choose to administer the surveys on paper. The information in this chart is based on average TA and training survey lengths, which vary depending on the amount of information covered by each engagement.

Though the annual burden hours increased for the in-person and online training surveys, the complete removal of the *Community Development Marketplace (CDM) Project Intake Survey* and the *Survey of Community Partners Receiving HUD Staff-Led Technical Assistance* reduced the **overall** number of respondents, total annual responses, and total annual hours reflected in Item 13 of OMB Form 83-I. The reductions from the removal of the two surveys were significantly greater than the increases from the revisions to two of the remaining surveys, which led to an ultimate overall reduction in burden reflected on the OMB Form 83-I.

	13.a. Number of respondents	13.b. Total annual responses	13.c. Total annual burden hours
Prior Collection	11,292	15,066	5,428
Revised Collection	10,780	13,558	2,837
Overall Reduction	512	1,508	2,591

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.

Any publication of surveys results will be aggregated, and no confidential or identifying information will be shared with the general public. Reports (such as reports to Congress) will be completed on an as-requested basis.

The training surveys were launched in March 2018, and the TA surveys were launched in April 2019. The surveys do not have an end date, as they are collected on an on-going basis after the completion of individual TA and training engagements. As stated above, publication of the results will be completed on an as-requested basis (e.g., when Congress requests a report evaluating the Community Compass TA program).

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 OMB approval number and date will appear on the surveys.

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

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This collection of information does not employ statistical methods.

