

Supporting Statement for Paperwork Reduction Act Submissions

Housing Counseling Training Grant Program

OMB Control Number: 2502-0567

Forms: SF-424, HUD-92910, HUD-2880

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 collection of the information is necessary to allow the Office of Housing Counseling to review, rate and rank applications received under the Housing Counseling Training Grant Program Notice of Funding Availability. The collection assures that the data and information received is consistent among all applicants.

The Housing Counseling Training Grant program provides training for housing counselors on a nationwide basis. The training offered under this program supports the goal of having a strong and knowledgeable network of housing counselors. Eligible applicants are 501 (c)(3) organizations and governmental agencies with experience in providing housing counseling training on a national basis.

The Office of Housing Counseling is responsible for administering the Department's Housing Counseling Program, and its Housing Counseling Training Grant Program. HUD's Housing Counseling Program is authorized by Section 106 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701x) and Section 4 of the Department of Housing and Urban Development Act (42 U.S.C. 3533) as amended the Expand and Preserve Home Ownership Through Counseling Act (12 U.S.C. 1701) note. The Housing Counseling implementing regulations are found at 24 CFR part 214. Additional guidance is provided in the HUD Handbook 7610.1, REV-5.

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.

To improve the quality and standardize the counseling that HUD approved counseling agencies provide, HUD implemented a Housing Counseling Training Grant Program in 2006. The Housing Counseling Training Grant Program Notice of Funding Availability (NOFA) requests 5 rating factors narrative responses, form (HUD-92910) and supporting documentation that will be used by HUD's Office of Housing Counseling to evaluate and rank applications submitted through Grants.gov. These Rating Factors will be used to evaluate applications. The maximum score is 100 for all applicants. HUD may rely on other information, such as performance reports, financial status information, monitoring reports, audit reports and other information available to HUD in making score determinations under any Rating Factor. The form HUD-92910 (charts) and narratives in

this collection allows HUD to evaluate and select the most qualified applicant(s). Applicants must be a public or private non-profit organization and must submit evidence of “tax exempt” status under section 501(a) pursuant to section 501(c)(3) of the Internal Revenue Code (26 USC 501(a) and (c)(3)). Applicants may also be State Housing Finance Agencies (SHFA)s and other units of local, county or state government. Applicants must have at least two years of experience providing housing counseling training services nationwide to housing counselors employed by housing counseling agencies participating in HUD’s Housing Counseling Program. Applicants are not required to be HUD Approved Housing Counseling Agencies.

The FY2018 Notice of Funding Availability (NOFA) for the Housing Counseling Training Grant Program competed \$3.5 million for a fifteen-month period of performance. Four national housing counseling agencies were awarded funds to provide training on a national basis for a 5-quarter period of performance starting 7/1/2018.

The collection of post award data during the grant management period is done electronically and the information is used to assure compliance with the grant agreement. The grantees are required to submit quarterly reports on their performance under the grant.

The number of hours has increased as the estimates are based on a 5-quarter period of performance rather than 4 quarters.

This is a Two-Year NOFA: One Competition Distributes Subsequent Year Funding if Available. HUD will use the grant applications received for FY 2019 and the corresponding scores and funding methodology to make awards for FY 2020, subject to the availability of appropriations. HUD will contact eligible FY 2019 grantees to determine their interest in FY 2020 funds if available.

There were no changes to the 5 rating factors. Changes were made to the HUD-92910 to clarify instructions and to reduce the burden by deleting columns that were not needed. A list of the changes is included in the package (Forms Revision Chart).

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.

Unless otherwise directed, applications in response to the proposed FY 2019 Training NOFA will be submitted electronically through Grants.gov. Electronic submission eliminates the burden on applicants to print, organize, and ship multiple copies of their applications. Additionally, Grants.gov auto-populates common elements of many forms, so that standard information about the applicant that appears on several forms only needs to be entered once. The Application Package contains the Adobe forms created by Grants.gov. The Instruction Download contains official copies of the NOFA and forms necessary for a complete application. The Instruction Download may include Microsoft Word, Microsoft Excel and additional documents. Documents such as letters of support, letters of matching funds, Memorandum of Understanding from

proposed partners may be downloaded to grants.gov.

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 Housing Counseling Training Grant Program is distinct from the Comprehensive Housing Counseling Program which requires some similar forms for its applicants. However, this data collection is not duplicative.

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 impact small businesses or 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.

The collection is needed to ensure that applicants meet particular eligibility criteria and possess the capability to deliver effective and efficient services. If the data are not collected, OHC would not be able to adequately analyze the grant applications to determine funding. The collection must be done when there is a published NOFA for the housing counseling training grants which is usually done on a yearly basis. Also, the collection is needed for monitoring grant management. The grantees are required to submit quarterly reports on their activities which are tied to the collection.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner: (PLEASE ANSWER EACH BULLET SEPARATELY)

* requiring respondents to report information to the agency more often than quarterly;
Not applicable. The Cooperative Agreement requires only quarterly reports.

* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
Not applicable. Respondents do not need to prepare any written response to collection.

* requiring respondents to submit more than an original and two copies of any document;
Not applicable. The application is submitted electronically through grants.gov. No additional copies are required.

* requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
Not applicable. Respondents are not required to retain records for more than three years.

* 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. There is no statistical survey.

* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

Not applicable. There is no statistical survey or data classification.

* 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. There is no additional pledge of confidentiality.

or

* 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. There is no such requirement.

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 on 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 may preclude consultation in a specific situation. These circumstances should be explained.

In accordance with 5 CFR 1320.8(d), this information collection soliciting public comments was announced in the Federal Register on December 2, 2019, Volume 84, Page 65996. No Comments received.

A 30-day Federal Register Notice inviting public comments was published on March 4, 2020, Volume 85, Page 12804. No comments were received.

Information was gathered from the following national housing counseling training grantees on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and cost and hour burden. The grantees are contacted at least quarterly through grant reports and emails and phone calls

from the OHC staff. The questions and concerns of the grantees resulted in some changes to the data collection.

Neighborhood Reinvestment Corporation
1325 G St., NW Suite 800
Washington, DC 20005-3104

UnidosUS
1126 16th St., NW
Washington, DC 20036-4804

National Community Reinvestment Coalition
727 15th St., NW, Suite 900
Washington, DC 20005-6027

Rural Community Assistance Corporation
3120 Freeboard Drive
West Sacramento, CA 95691-5039

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

There are no payments to respondents, other than funds awarded to selected grantees to under the Housing Counseling Training Grant NOFA.

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

HUD is taking the standard precautions regarding the electronic transfer of sensitive information such as client level data, including firewall protection, encryptions, and access security.

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 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 for approval 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.

* 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	Number of Responses	Burden Hours per Response	Total Burden Hours	Hourly Cost	Total Annual Cost
One-time submission							
SF-424	0	0	0	0	0	0	0
HUD-2880 (2510-0011)	8	1	8	2	16	\$61.93	\$991
NOFA Rating Factors- 1-5 Narratives and HUD-92910	8	1	8	102	816	\$61.93	\$50,535
Post Award Submission	4	1	4	12	48	\$61.93	\$2,973
TOTAL FOR APPLICATION PROCESS	20		20		880	\$61.93	\$54,499
Grant Management – quarterly reporting	4	5	20	25	500	\$61.93	\$30,965
TOTAL GRANT MANAGEMENT – QUARTERLY REPORTING	4	5	20	25	500	\$61.93	\$30,965
GRAND TOTAL	24		40		1380	\$61.93	\$85,464

The hours are based on grantees’ actual experience with the forms and documents. The number of grant management hours has increased as the estimates as the grant is now for 5 quarters rather the previously required 4 quarters.

According to the 2018 U.S. Department of Labor, Bureau of Labor Statistics website (https://www.bls.gov/oes/current/oes_nat.htm) the wage rate category for Education Administrator- Other is estimated to be \$61.93 (\$42.42 x 1.46) per hour therefore, the estimated burden hour cost to respondents Education Manager-other is estimated to be \$85,464 annually.

13. Provide an estimate for 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 and 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 collections 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 additional costs to respondents.

14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs [Describe]	\$0.00
Staff Salaries* <u>One-time submission/ Review of applications:</u> Of the 8 responses, 4 teams of 2 OHC staff will review 2 responses each. The hours per response are 21. The total number of hours will be 168. Using (GS 13-10) hourly rate of \$47.11 plus 1.46 multiplier for \$68.78 the total cost is \$11,555.	\$17,057

<u>On-going/ grant management</u> : 4 grantees will submit 5 quarterly reports which will be reviewed by 4 OHC staff. This is a total of 20 responses for 4 hours each for a total of 80 hours. Using (GS 13-10) hourly rate of \$47.11 plus 1.46 multiplier for \$68.78, the total cost is \$5,502	
Facilities [cost for renting, overhead, etc. for data collection activity]	\$0.00
Computer Hardware and Software [cost of equipment annual lifecycle]	\$0.00
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$0.00
Travel	\$0.00
Printing [number of data collection instruments annually]	\$0.00
Postage [annual number of data collection instruments x postage]	\$0.00
Other	\$0.00
Total	\$17,057

* Note: The "Salary Rate" includes a 1.46 multiplier to reflect a fully loaded wage rate.

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

This is a renewal of a currently approved collection. There are no changes to information being collected or how it is being collected. There was an increase in burden hours that were reported based on the change from a 4-quarter period of performance to a 5-quarter period of performance.

The estimates are based on actual Housing Counseling Training Grant Program awardee experience with the Training Grant NOFA. These charts do not affect how the housing counseling program is being administered.

The SF-424 Supplemental form has been removed from the burden as it has been discontinued and is no longer being used in the collection.

16. For collections 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.

After the grant awards, HUD will publish the information on the selected grantee(s), including the name of the organization, the address, organization mission, and grant amount on HUD Exchange <https://www.hudexchange.info/programs/housing-counseling/>. A press release and LISTSERV are also 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.

HUD is not seeking approval to avoid displaying the OMB expiration date.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement identified in item 19 of the OMB 83-I.

B. Collections of Information Employing Statistical Methods.

There is no statistical methodology involved in this collection.