

**Supporting Statement for Paperwork Reduction Act Submissions
(HOME Investment Partnership Program)
(OMB# 2506-0171)**

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 HOME Investment Partnership Program statute (Public Law 101-625 (104 Stat. 4079), Title II of the Cranston-Gonzalez National Affordable Housing Act) imposes several data collection and reporting requirements on the Department and on program participants. Information on assisted properties as well as on the owners or tenants of the properties is needed to fulfill the statutory requirements. This burden includes making the information available to the U.S. Department of Housing and Urban Development (HUD) for monitoring the performance of the program participants and ensuring compliance with all program requirements. While the narrative requirements for the HOME Program annual performance report have been moved to the Consolidated Plan rule (24 CFR Part 91), the Department is continuing to require that two reporting forms (HUD 40107 and HUD 40107A) be submitted under Part 92.

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.

HUD requires state and local Participating Jurisdictions (PJs) to collect information on the activities undertaken with HOME funds to be reviewed by HUD Field Office and Headquarters staff. Data is entered into the Integrated Disbursement and Information System (IDIS) by PJs for specific projects, including address, financial management, owner/developer, and beneficiary data as needed. HUD has used the data collection to monitor the use of HOME funds and to make sure PJs are complying with HOME rules and regulations.

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 collection of HOME Program information (collection of data on funds management, project and tenant characteristics, and owner data) has been automated by IDIS. IDIS eliminates the need for PJs to submit paper reports. The submission of Action Plan related documents by PJs to the Field Office is also automated. All of the data elements of the IDIS systems and Consolidated Plan are required under Title II or related authorities.

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.

No similar information exists. The information collected through IDIS is project-specific and, therefore, unique to each PJ's local HOME program. Other recordkeeping requirements (e.g., property standards, written agreements, tenant protections) are project- or program-specific and unique to local HOME programs. Documentation relating to nondiscrimination, displacement and relocation and lead-based paint are unique to individual program designs and do not result in duplication of effort.

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.

There is no undue burden to small businesses or other 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 information is collected on a project-by-project basis to permit PJs to draw down HOME funds from the U.S. Treasury and to ensure that HOME funds are used for eligible purposes. The system acts as a grants management application that allows HUD to track compliance with deadlines, beneficiary information and other information pertaining to the HOME statute. Not collecting this data would put undue stress on PJs and HUD to oversee that program. It is not possible to collect the information less frequently.

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; **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; **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.

This information collection was announced in the Federal Register, Volume 85 Page 16641, on March 24, 2020. In response to the Proposed Information Collection HUD received submissions no comments

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

There have been no gifts or payments in association with this program

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

PJs receiving HOME funds will collect and maintain records of information. Information on activities and expenditures of grant funds is public information and is generally available for disclosure. Recipients are responsible for ensuring confidentiality when public disclosure is not required.

The Privacy Act of 1974 provided privacy protection to respondents. There are no assurances of confidentiality provided.

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 in association with this program.

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.

| Reg. Section | Paperwork Requirement | Number of Responses | Frequency of Response | Responses per Annum | Burden Hour per Response | Annual Burden Hours | Hourly Cost per Response | Annual Cost |
|--------------|--|---------------------|-----------------------|---------------------|--------------------------|---------------------|--------------------------|----------------|
| § 92.61 | Program Description and Housing Strategy for Insular Areas | 4.00 | 1.00 | 4.00 | 10.00 | 40.00 | \$41.37 | \$1,654.80 |
| § 92.66 | Reallocation - Insular Areas | 4.00 | 1.00 | 4.00 | 3.00 | 12.00 | \$41.37 | \$496.44 |
| § 92.101 | Consortia Designation | 36.00 | 1.00 | 36.00 | 5.00 | 180.00 | \$41.37 | \$7,446.60 |
| § 92.201 | State Designation of Local Recipients | 51.00 | 1.00 | 51.00 | 1.50 | 76.50 | \$41.37 | \$3,164.81 |
| § 92.200 | Private-Public Partnership | 594.00 | 1.00 | 594.00 | 2.00 | 1,188.00 | \$41.37 | \$49,147.56 |
| § 92.201 | Distribution of Assistance | 594.00 | 1.00 | 594.00 | 2.00 | 1,188.00 | \$41.37 | \$49,147.56 |
| § 92.202 | Site and Neighborhood Standards | 594.00 | 1.00 | 594.00 | 2.00 | 1,188.00 | \$41.37 | \$49,147.56 |
| § 92.203 | Income Determination | 6,667.00 | 1.00 | 6,667.00 | 2.00 | 13,334.00 | \$41.37 | \$551,627.58 |
| § 92.203 | Income Determination | 85,000.00 | 1.00 | 85,000.00 | 0.75 | 63,750.00 | \$41.37 | \$2,637,337.50 |
| § 92.205(e) | Terminated Projects | 180.00 | 1.00 | 180.00 | 5.00 | 900.00 | \$41.37 | \$37,233.00 |
| § 92.206 | Eligible Costs - Refinancing | 100.00 | 1.00 | 100.00 | 4.00 | 400.00 | \$41.37 | \$16,548.00 |
| § 92.210 | Troubled HOME-Assisted Rental Projects | 25.00 | 1.00 | 25.00 | 0.50 | 12.50 | \$41.37 | \$517.13 |
| § 92.251(a) | Rehabilitation Projects – New Construction | 3,40.000 | 3.00 | 10,200.00 | 3.00 | 30,600.00 | \$41.37 | \$1,265,922.00 |
| § 92.251(b) | Rehabilitation Projects – Rehabilitation | 5,100.00 | 2.00 | 10,200.00 | 2.00 | 20,400.00 | \$41.37 | \$843,948.00 |
| § 92.252 | Qualification as affordable housing: Rental Housing: | 50.00 | 5.00 | 250.00 | 25.00 | 6,250.00 | \$41.37 | \$258,562.50 |

| Reg. Section | Paperwork Requirement | Number of Responses | Frequency of Response | Responses Per Annum | Burden Hour Per Response | Annual Burden Hours | Hourly Cost per Response | Annual Cost |
|----------------|---|---------------------|-----------------------|---------------------|--------------------------|---------------------|--------------------------|----------------|
| § 92.252(j) | Fixed and Floating HOME Rental Units | 45.00 | 1.00 | 45.00 | 1.00 | 45.00 | \$41.37 | \$1,861.65 |
| § 92.251 | Written Property Standards | 6,667.00 | 3.00 | 20,001.00 | 3.00 | 60,003.00 | \$41.37 | \$2,482,324.11 |
| § 92.253 | Tenant Protections (including lease requirement) | 6,667.00 | 1.00 | 6,667.00 | 5.00 | 33,335.00 | \$41.37 | \$1,379,068.95 |
| § 92.254 | Homeownership - Median Purchase Price | 80.00 | 1.00 | 80.00 | 5.00 | 400.00 | \$41.37 | \$16,548.00 |
| § 92.254 | Homeownership - Alternative to Resale/recapture | 100.00 | 1.00 | 100.00 | 5.00 | 500.00 | \$41.37 | \$20,685.00 |
| § 92.254(a)(5) | Homeownership – Approval of Resale & Recapture | 2,000.00 | 1.00 | 2,000.00 | 1.50 | 3,000.00 | \$41.37 | \$124,110.00 |
| § 92.254(a)(5) | Homeownership – Fair Return & Affordability | 2.00 | 1.00 | 2.00 | 1.00 | 2.00 | \$41.37 | \$82.74 |
| § 92.254(f) | Homeownership program policies | 600.00 | 1.00 | 600.00 | 5.00 | 3,000.00 | \$41.37 | \$124,110.00 |
| § 92.300 | CHDO Identification | 594.00 | 1.00 | 594.00 | 2.00 | 1,188.00 | \$41.37 | \$49,147.56 |
| § 92.300 | CHDO Project Assistance | 594.00 | 1.00 | 594.00 | 2.00 | 1,188.00 | \$41.37 | \$49,147.56 |
| § 92.303 | Tenant Participation Plan | 4,171.00 | 1.00 | 4,171.00 | 10.00 | 41,710.00 | \$41.37 | \$1,725,542.70 |
| § 92.351 | Affirmative Marketing | 1,290.00 | 1.00 | 1,290.00 | 5.00 | 6,450.00 | \$41.37 | \$266,836.50 |
| § 92.354 | Labor | 6,667.00 | 1.00 | 6,667.00 | 2.50 | 16,667.50 | \$41.37 | \$689,534.48 |
| § 92.357 | Debarment and Suspension | 6,667.00 | 1.00 | 6,667.00 | 1.00 | 6667.00 | \$41.37 | \$275,813.79 |
| § 92.501 | HOME Investment Partnership Agreement (HUD 40093) | 598.00 | 1.00 | 598.00 | 1.00 | 598.00 | \$41.37 | \$24,739.26 |

| Reg. Section | Paperwork Requirement | Number of Responses | Frequency of Response | Responses per Annum | Burden Hours per Response | Annual Burden Hours | Hourly Cost per Response | Annual Cost |
|----------------|--|---------------------|-----------------------|---------------------|---------------------------|---------------------|--------------------------|----------------|
| § 92.504 | Participating Jurisdiction's Written Agreements | 6,667.00 | 1.00 | 6,667.00 | 10.00 | 66,670.00 | \$41.37 | \$2,758,137.90 |
| § 92.300 | Designation of CHDOs | 480.00 | 1.00 | 480.00 | 1.50 | 720.00 | \$41.37 | \$29,786.40 |
| § 92.502 | Homeownership and Rental Set-Up and Completion | 594.00 | 1.00 | 594.00 | 16.00 | 9,504.00 | \$41.37 | \$393,180.48 |
| § 92.502 | Tenant-Based Rental Assistance Set-Up (IDIS) | 225.00 | 1.00 | 225.00 | 5.50 | 1,237.50 | \$41.37 | \$51,195.38 |
| § 92.502 | Performance Measurement Set-Up and Completion Screens (IDIS) | 6,671.00 | 1.00 | 6,671.00 | 21.00 | 140,091.00 | \$41.37 | \$5,795,564.67 |
| § 92.502 | IDIS Access Request form (HUD 27055) | 50.00 | 1.00 | 50.00 | 0.50 | 25.00 | \$41.37 | \$1,034.25 |
| § 92.502(a) | Required Reporting of Program Income | 645.00 | 1.00 | 645.00 | 12.00 | 7,740.00 | \$41.37 | \$320,203.80 |
| § 92.504(c) | Written Agreement | 8,500.00 | 1.00 | 8,500.00 | 1.00 | 8,500.00 | \$41.37 | \$351,645.00 |
| § 92.504(d)(2) | Financial Oversight and HOME Rental projects | 18,500.00 | 1.00 | 18,500.00 | 1.00 | 18,500.00 | \$41.37 | \$765,345.00 |
| § 92.508 | Recordkeeping-Subsidy Layering and Underwriting | 13,302.00 | 1.00 | 13,302.00 | 4.00 | 53,208.00 | \$41.37 | \$2,201,214.96 |
| § 92.508 | Recordkeeping (Additional) | 10,110.00 | 1.00 | 10,110.00 | 1.00 | 10,110.00 | \$41.37 | \$418,250.70 |
| § 92.509 | Annual Performance Reports (HUD 40107) | 598.00 | 1.00 | 598.00 | 2.50 | 1,495.00 | \$41.37 | \$61,848.15 |
| § 92.509 | Management Reports - FY Match Report (HUD 40107A) | 594.00 | 1.00 | 594.00 | 0.75 | 445.50 | \$41.37 | \$18,430.34 |

| Reg. Section | Paperwork Requirement | Number of Responses | Frequency of Response | Responses per Annum | Burden Hours per Response | Annual Burden Hours | Hourly Cost per Response | Annual Cost |
|----------------------|--|---------------------|-----------------------|---------------------|---------------------------|---------------------|--------------------------|-----------------|
| § 92.550 § 91.525 | HUD Monitoring of Program Documentation and Activities | 645.00 | 1.00 | 645.00 | 0.25 | 161.25 | \$41.37 | \$6,670.91 |
| § 91.220 | Describe the plan for outreach | 427.00 | 1.00 | 427.00 | 1.00 | 427.00 | \$41.37 | \$17,664.99 |
| § 91.220 | Describe plan to ensure suitability | 427.00 | 1.00 | 427.00 | 1.00 | 427.00 | \$41.37 | \$17,664.99 |
| | Direct Deposit Sign up form (SF 1199A) | 10.00 | 1.00 | 10.00 | 0.25 | 2.50 | \$41.37 | \$103.43 |
| Totals | | 204,176.00 | | | | 633,536.25 | | \$26,209,394.66 |

Annual cost is based on Actual Burden Hours (633,536) * the hourly rate for a GS-12 (\$41.37)

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 additional costs to the respondents (other than the cost shown 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 Hours per Response | Annual Burden Hours | Hourly Cost per Response | Annual Cost |
|--|-----------------------|-----------------------|---------------------|---------------------------|---------------------|--------------------------|--------------|
| Consortia Applications and Certification | 12.00 | 1.00 | 12.00 | 2.00 | 24.00 | \$49.19 | \$1,180.56 |
| Investment Partnership Agreement | 639.00 | 1.00 | 639.00 | 1.00 | 639.00 | \$49.19 | \$31,432.41 |
| IDIS Program Management Reports (Field Office) | 43.00 | 12.00 | 516.00 | 14.00 | 7,224.00 | \$49.19 | \$355,348.56 |
| IDIS Program Management Reports (Headquarters) | 1.00 | 12.00 | 12.00 | 250.00 | 3,000.00 | \$49.19 | \$147,570.00 |
| Management Reports (Field Office) | 639.00 | 1.00 | 639.00 | 0.5 | 319.50 | \$49.19 | \$15,716.21 |
| Management Reports (Headquarters) | 637.00 | 1.00 | 637.00 | 0.25 | 159.25 | \$49.19 | \$7,833.51 |
| Total: | | | | | 11,365.75 | | \$559,081.24 |

Total cost to the Federal Government: 11,365.75 hours at \$49.19/hour (This figure is based on GS-13 salary)

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 revision, and the hourly cost changed the amount due to GS salary chart. The revised cost burden estimate and the increase is reflected in the cost burden calculations that are presented in chart above.

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.

Not later than 120 days after the end of each fiscal year, the Department is required at Section 284(b) of the Act to report to Congress on the overall progress of program participants in meeting statutory and regulatory provisions of the HOME Program. The report must include a description of the action taken by PJs to establish and oversee minority outreach programs as required by Section 281 of the Act and include an assessment of the fiscal year performance of the program based upon the data identified herein.

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 not display the expiration date.

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

There are no exceptions being requested for the certification statements.

B. Collections of Information Employing Statistical Methods