

**Supporting Statement for Paperwork Reduction Act Submissions
Veteran Housing Rehabilitation and Modification Pilot Program
(OMB# 2506-0213)**

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.

This is an extension of a currently approved collection. Section 1079 of the Carl Levin and Howard P. “Buck” McKeon National Defense Authorization Act for Fiscal Year 2015 (Public Law 113-291) established the Veterans Housing Rehabilitation and Modification Pilot Program (VHRMP). The purpose of the Veterans Housing Rehabilitation and Modification Pilot Program is to award grants to nonprofit organizations to rehabilitate and modify the primary residence of low-income veterans with disabilities. The funds made available under this program are awarded competitively. HUD must collect certain certifications and information from applicants and collect information of the use and outcomes of these grants to comply with both program-specific and cross-cutting grant application and reporting requirements, including requirements under Section 1079(b)(2) and (8) of the Carl Levin and Howard P. “Buck” McKeon National Defense Authorization Act for Fiscal Year 2015, cross-cutting Federal grant requirements in title 2 of the Code of the Federal Regulations, and cross-cutting requirements for HUD grants identified in 24 CFR part 5, subpart A, and the program Notice of Funding Opportunity (NOFO).

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 information collected is used to determine the eligibility, qualification, and capability of applicants to implement VHRMP’s purpose. Second, grantees must establish and maintain records to allow HUD to determine whether or not activities are being carried out in accordance with applicable laws and requirements and to facilitate the review and audit of grant management. Post-award data such as quarterly reports (which includes such information as activity and budget information, drawdowns, performance reports, and Federal Financial Reports or FFRs) will continue to be submitted via the Disaster Recovery Grant Reporting System (DRGR).

The instruments to be used are:

Purpose: These forms listed below are used as part of the VHRMP process. This is a competitive grant.

SF-424	This is a standard form required for use as a cover sheet for submission of pre-applications and applications and related information under discretionary program	This form provides applicant’s contact information, EIN Number, DUNS number, amount of funds requested, and other information regarding eligibility requirements
HUD-424 CB	HUD Grant Application Detailed Budget	Detailed Budget provides 3-year plan regarding how funds will be expended in completed project activities and related requirements.
HUD-424 CBW-I	HUD Grant Application Budget Worksheet	Applicant is required to complete this form in order to explain in detail how all grant forms will be used and for what specific purpose. Form must confirm that funds will be

		used within program requirements and policies.
SF-LLL	Disclosure of Lobbying Activities	Completion of this form is required to disclose lobbying activities pursuant to 31 U.S.C. 1352
HUD-2880	Applicant/Recipient Disclosure/Update Report	Applicant is required to complete this form in order to verify there are no conflicts of interest or violations of government policies with respect to receiving funds from the government.
HUD-2991	Certification of Consistency with the Consolidated Plan	Applicant is required to complete this form in order to certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan.
HUD-2993	Acknowledgment of Application Receipt	This form is used to verify that the application was received by HUD by the deadline and will consider it for funding. In accordance with Section 103 of the Department of Housing and Urban Development Reform Act of 1989, no information will be released by HUD regarding the relative standing of any applicant until funding announcements are made
HUD-2994A	Grant Applicant Survey	This form is completed by the applicant to assist HUD in making sure the application process is effective. Information collected is used to make improvements and modifications that will improve the application process.
HUD-27061	Race and Ethnic Data Reporting Form	Applicants requesting funding from the Department of Housing and Urban Development (HUD); and organizations who receive HUD Federal financial assistance that are required to report race and ethnic information
HUD-27300	Questionnaire for HUD's Initiative on Removal of Regulatory Barriers	This questionnaire is designed to assist in the removal of regulatory barriers that make it difficult for applicants applying for housing projects in such jurisdictions and counties.

- 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.

HUD requires applicants to submit applications electronically through Grants.gov. Post-award data such as quarterly reports (which includes such information as activity and budget information, drawdowns, performance reports, and Federal Financial Reports or FFRs) will continue to be submitted via DRGR).

- 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 duplication of efforts is caused by this collection.

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 does not adversely impact small businesses or other small entities. Applicants must be nonprofits that provide nationwide or statewide programs that primarily serve disabled or low-income veterans.

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.

Under the HUD Reform Act of 1989, discretionary funds must be awarded on a competitive basis. Without collecting this information, funds could not be awarded. Hence, this will circumvent Congress' directive to HUD to implement this pilot program. Data will be collected on quarterly basis.

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; **If HUD determines more frequent reporting is necessary for the effective monitoring of the Recipient's performance or use of funds under the grant agreement, HUD may require the Recipient to submit its performance and financial reports on a monthly basis.**
- 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; or **Not Applicable**
- 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**

There are no special circumstances that would cause any information collection to be conducted in a manner as explained in the Special Instruction. Mandatory, federal grant administration requirements of 2 CFR Part 200 addresses the maintenance of the appropriate files.

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 83; Page 3177, on March 1, 2021. No comments were received.

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

Information collection does not involve any payments or gifts to respondents other than remuneration of contractor or grantee.

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

Submissions are covered by the Privacy Act. Information that may be released under the Freedom of Information Act will be released in accordance with the mandates of that Act.

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.

The information that will be collected by HUD will not include personal information of specific individuals benefiting from VHRMP. The forms that are included in the PRA Supporting Statement does not include forms that request personal information from individuals who receive benefits or assistance from the grant program. Grantees who receive VHRMP funds are required to determine eligibility requirements based on the VHRMP NOFO.

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
HUD-424CB	200	1	200	2.60	520	70.45	\$36,634.00
HUD-424CBW	200	1	200	3.12	624	70.45	\$43,960.80
HUD-2880	200	1	200	2	400	70.45	\$28,180.00
HUD-2991	200	1	200	0	0	70.45	\$0
HUD-2993	200	1	200	0	0	70.45	\$0
HUD-2994A	200	1	200	0.5	100	70.45	\$7,045.00
HUD-27061	200	1	200	0.5	100	70.45	\$7,045.00
HUD-27300	200	1	200	3	600	70.45	\$42,270.00
Total	--	--	--	11.72	2,344	--	\$165,134.80

Explanation of Burden Hours: Number of responses is based on number of eligible applicants under the Veterans Housing Rehabilitation and Modification Program proposed guidelines. The number of burden hours is based on information gathered from Rural Housing and Economic Development Program (RHED) applicants. Application requirements and semi-annual reporting requirements for the Veterans Housing Rehabilitation and Modification Program are modeled after the requirements of the RHED program.

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 is no additional cost other than those shown in #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 VHRMP is a competitive program in the Office of Rural Housing and Economic Development (ORHED). The ORHED has extensive experience and expertise in reviewing and managing competitive programs which have included, but not limited to: Youthbuild; Historically Black Colleges and Universities; Rural Housing and Economic Development; Community Capital Initiatives; and Self-Help Homeownership Opportunity Program (SHOP). The annualized cost to the Federal Government for a review of VHRMP applications, selection of grant recipients, and administration of oversight of the grants is an estimated total cost of **\$23,752.80** based on previous management and competitive program experience. The details are provided below:

Employee Grade	Hourly Rates	Hourly Rate x 80 hours (2 weeks)
GS 14-7	\$70.45	\$5,636.00
GS 14-7	\$70.45	\$5,636.00
GS 14-10	\$ 76.32	\$6,105.60
GS 15-10	\$ 82.65	\$6,547.20
	TOTAL	\$23,924.80

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

This is an extension of a currently approved collection. There are no changes and/or adjustments.

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 VHRMP NOFA was published during FY 2020 with a total award of \$3,999,992 given to four nonprofit organizations. The timelines for the specific VHRMP NOFA publication date, closing date, and award date will be contingent upon budget approval for FY 2021. Results of the future VHRMP grant competition will be accessible on the HUD website in the form of a list of awardees approximately six months after receipt of these applications.

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 for the OMB approval will be displayed.

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

There are no exceptions to the certifications.

B. Collections of Information Employing Statistical Methods

No statistical methods will be used.