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## 19. Certification for Paperwork Reduction Act Submissions

On behalf of the U.S. Department of Housing and Urban Development, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9.

**Note:** The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320/8(b)(3), appear at the end of the instructions. The certification is to be made with reference to those regulatory provisions as set forth in the instructions.

The following is a summary of the topics, regarding the proposed collections of information that the certification covers:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities;
- (d) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) It indicates the retention periods for recordkeeping requirements;
- (g) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
  - (i) Why the information is being collected;
  - (ii) Use of the information;
  - (iii) Burden estimate;
  - (iv) Nature of response (voluntary, required for a benefit, or mandatory);
  - (v) Nature and extent of confidentiality; and
  - (vi) Need to display currently valid OMB control number;
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to collected (see note in item 19 of the instructions);
- (i) It uses effective and efficient statistical survey methodology; and
- (j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in item 18 of the Supporting Statement.

Signature of Program Official:	Date:
X Robert Mulderig, Deputy Assistant Secretary, Office of Public Housing Investments	

Signature of Senior Officer or Designee:	Date:
X Colette Pollard, Departmental Reports Management Officer Office of Chief Information Officer	

## Supporting Statement for Paperwork Reduction Act Submissions

### A. Justification

1. Section 538 of the Public Housing Reform Act (Pub. L. 105-276, 112 Stat. 2461, approved October 21, 1998) added a new section 34 to the U.S. Housing Act of 1937 which provides a mandate to link supportive services to help public housing residents achieve economic self-sufficiency. The Resident Opportunities and Self-Sufficiency (ROSS) Program responds to this requirement by providing funding to Public Housing Authorities, Tribes/Tribally Designated Housing Entities, resident organizations, and qualified nonprofit organizations to provide supportive services or service coordination to public housing residents.

All applicants to the ROSS program must: have in place a firmly committed match contribution equivalent to 25 percent of the total grant amount requested; provide the sources of their match; indicate their expected outputs and outcomes; provide salary comparability information; and indicate the number of units they will serve.. The ROSS forms help the Department capture this information and evaluate applicants so that HUD can determine if applicants will meet these and other programmatic requirements.

2. The forms will collect information such as the number of Service Coordinators needed, the number of units to be served, the budget for each Service Coordinator, salary comparability information, the total match contribution, and the projected services and outcomes for each grantee. These forms are necessary in order to evaluate applicants' capacity and eligibility for funding.
3. All applicants, unless granted a waiver, must submit grant applications electronically to HUD via the [www.grants.gov](http://www.grants.gov) web site. This does not necessarily reduce the reporting burden as the information required for submission is the same as that required when paper applications were submitted. Since the forms are electronic, this may also allow for responses to be prepopulated from one form to the other where applicable which may be less burdensome when applicants are completing forms.
4. There is no duplication of information. HUD standard forms used in conjunction with the application process do not ask questions that are specific enough for the program area to evaluate applicants' eligibility, applicants' full capacity, organizational composition, viability of their proposal, and experience of relevant staff. For this reason, forms specific to the ROSS program have been developed. Without the information gathered in these forms, the Department would not be able to fully evaluate applicants' capacity to run an effective program and administer federal funds.
5. The information being collected has no significant impact on small businesses or other small entities. All eligible applicants will submit the same forms, certifications, and assurances.
6. ROSS-specific forms (HUD-52752, HUD-52753, HUD-52755, HUD-52768) are collected on a one-time basis. Less frequent collection is not possible as applicants apply for funding only once a year. This information must be collected to allow HUD to determine qualification for grant funding. Not collecting this information would make it impossible to assess which organizations should receive funding and the funding amount. These forms allow HUD to get a complete picture of each applicant and are a vital tool the Department uses to ensure that funding is awarded as fairly as possible.

Program-Specific Forms	Required For:
HUD-52752 (Cert. with Indian Hsng. Plan)	Tribes/TDHEs for ROSS
HUD-52753 (Cert. Resid. Board Election)	Resident Associations and Non-Profits supported by RAs for ROSS
HUD-52755 (Sample Contract Admin. Partnership Agreement)	All Resident Associations and Troubled PHAs for ROSS
HUD-52768 – ROSS SC Application Form	All ROSS SC Applicants

7. Explain any special circumstance that would cause an information to be collected in a manner:

There are no special circumstances that require the collection to be conducted in a manner which is inconsistent with the guidelines in 5 CFR 1320. The information is collected once a year during the application period and therefore, no other special circumstances exist requiring the collection to be conducted on a more frequent basis.

- Requiring respondents to report to the agency more than quarterly: **None. These forms are only used once a year.**
- Requiring respondents to prepare a written response to a collection of information in fewer than 30 days of receipt of it: **None. These forms are only used once a year and applicants are given at least 45 days to respond.**
- Requiring respondents to submit more than one original and two copies of any document: **Only one copy of documents is 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.**
- In connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of the study: **Not applicable.**
- Requiring the use of 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 it has instituted procedures to protect the information’s confidentiality to the extent permitted by law. **Not applicable.**

8. HUD published a Notice of Proposed Information Collection for public comments in the Federal Register, Volume 84; No. 247, page 70986 on December 26, 2019. The public had until February 24, 2020, to submit comments on the proposed information collection. No public comments were received.

9. No payment or gift will be provided to respondents.

10. No assurance of confidentiality is provided. The HUD Reform Act includes specific requirements for the government to make all information regarding applications for HUD assistance available for public inspection, after awardees have been determined and awards made.

The Privacy Act of 1974 (Pub. L. No. 93-579, 88 Stat. 1896, 5 U.S.C. 552a) protects respondents who meet the information reporting requirements.)

11. The forms do not ask questions of a sensitive nature. This includes the Applicant/Recipient Disclosure/Update Report (HUD 2880).
12. We estimate the information collection requirements of the ROSS NOFA will have the following reporting burden (please see chart below):

Information Collection	Number of Respondents	Frequency of Response	Total Annual Responses	Burden Hours/ Minutes per Response	Total Annual Burden Hours	Hourly Cost	Total Annual Cost
HUD-52752 (Cert. with Indian Hsng. Plan)	50	1	50	.17	8.5	\$0	\$0
HUD-52753 (Cert. Resid. Board Election)	100	1	100	.17	17	\$0	\$0
HUD-52755 (Sample Contract Admin. Partnership Agreement)	100	1	100	0	0	\$0	\$0
HUD-52768 (ROSS SC Application Form)	350	1	350	3	1050	\$0	\$0
SF-424 (OMB No: 4040-0004)	350	1	350	0	0	\$0	\$0
HUD-2880- Applicant Disclosure/ Update Report (OMB No: 2510-0011)	350	1	350	0	0	\$0	\$0
HUD-2991 – Certification of Consistency with Consolidated Plan (OMB No. 2506-0214)	325	1	325	0	0	\$0	\$0
HUD-2993 – Acknowledgement of Application Receipt (OMB No: 2577-0259) – Optional Form	5	1	5	0	0	\$0	\$0
HUD-2994A - You are Our Client (OMB No: 2535-0116) – Optional Form	350	1	350	0	0	\$0	\$0
SF-LLL-Disclosure of Lobbying Activities (OMB No: 0348-0046)	40	1	40	0	0	\$0	\$0

Grant Agreement*	150	1	150	N/A	0	\$0	\$0
Annual Report (InForm Tool) (2501-0034)	150	1	150	2	0	\$0	\$0
Subtotal (Program Reporting/Recordkeeping)	150	1	150	0	0	\$0	\$0
<b>Total</b>	<b>350</b>	<b>1</b>	<b>350</b>	<b>Varies</b>	<b>1,075.5</b>	\$0	\$0

The burden hours were estimated by HUD staff who completed a package of forms. For the ROSS SC program, the burden would be approximately 3.07 hours per application for a total of 1,074.5 hours.

\*The Grant Agreement is completed by HUD staff, signed by the recipient of the grant, and returned to HUD electronically. This form is a certification and HUD ascribes no burden to its use.

13. There will be no additional costs to the respondents. Application preparation and submission are part of the regular operation of Housing Authorities, Tribes, nonprofits, and resident organizations.
14. There will be no additional costs to the Federal Government. HUD grant staff receives, processes, reviews and recommends approval/denial of applications for grant funding routinely.
15. This collection package is a revision of a previously approved collection. The Logic Model form is no longer required as part of the application process and burden hours have been reduced from a total of 1,907 to a total of 1,075.5 burden hours.
16. Only the grants awarded and their amounts will be published in the Federal Register as required by the 1989 Reform Act.
17. The OMB approval will be displayed in the grant announcement.
18. There are no exceptions to the certification statement identified in item 19 of the SF 83-i.

**B. Collection of Information Employing Statistical Methods**

This information will not be collected using statistical methods.