## Supporting Statement for Paperwork Reduction Act Submissions HOME Investment Partnerships 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 Partnerships Program (HOME) statute (Public Law 101-625, November 28, 1990), Title II of the Cranston-Gonzalez National Affordable Housing Act, as amended (42 U.S.C. 12721 et. seq.) (the "Act") and the Homelessness Assistance and Supportive Services Program (HOME-ARP), pursuant to Section 3205 of the of the American Rescue Plan Act of 2021 (ARP) (P.L. 117-2), imposes several data collection and reporting requirements on the Department and on HOME Participating Jurisdictions (PJs). Information on individuals or families who are homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a); at risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(1)); fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking; in other populations where providing supportive services or assistance under section 212(a) of the Act (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability that are assisted with housing, rental assistance, supportive services, and non-congregate shelters, is needed to fulfill the statutory requirements. This burden includes making the information available to HUD for monitoring the performance of the PJs and ensuring compliance with all program requirements in 24 CFR part 92 and the implementation notice for HOME-ARP (the "HOME-ARP Notice").

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 PJs to collect information on the activities undertaken with HOME and HOME-ARP 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 will use the data collection to monitor the use of HOME and HOME-ARP funds, and to make sure PJs are complying with statutory, regulatory, and HOME-ARP Notice requirements.

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 and HOME-ARP program information (collection of data on funds management, subgrantees, and beneficiaries) 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 the Act or related authorities, 24 CFR Part 92, section 3205 of ARP, or the HOME-ARP Notice.

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 beneficiary specific and, therefore, unique to each PJ's local HOME or HOME-ARP program. Other recordkeeping requirements (e.g., property standards, written agreements, tenant protections) are project- or program-specific and unique to local HOME or HOME-ARP 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 and HOME-ARP funds from the U.S. Treasury and to ensure that HOME and HOME-ARP funds are used for eligible purposes. Additionally, information is collected for HOME and HOME-ARP activities that serve homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a); at risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(1)); fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking; in other populations where providing supportive services or assistance under section 212(a) of the Act (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability to track and ensure those funds are being used for the population for which they are intended. 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-inaid, 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 publications 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 latest update for the HOME PRA submission was announced in the Federal Register, Volume 86 Number 120; Page 33722, on June 25, 2021. In response to the Proposed Information Collection HUD received submissions no comments. This will be updated when the new announcement for HOME and HOME-ARP is submitted.

8. Explain any decision to provide any payment or gift to respondents, other than renumeration 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 or HOME-ARP grant funds will collect and maintain records of information. Information on activities and expenditures of HOME and HOME-ARP grant funds is public information and is generally available for disclosure. PJs are responsible for ensuring confidentiality when public disclosure is not required.

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 Respondents	Responses Per Annum	Total Annual Responses	Burden Hour Per Response	Annual Burden Hours	Hourly Rate	Annual Cost
§ 92.61	Program Description and Housing Strategy for Insular Areas	4.00	1.00	4.00	10.00	40.00	\$41.78	\$1,671.20
§ 92.66	Reallocation - Insular Areas	4.00	1.00	4.00	3.00	12.00	\$41.78	\$501.36
§ 92.101	Consortia Designation	36.00	1.00	36.00	5.00	180.00	\$41.78	\$7,520.40

Reg. Section	Paperwork Requirement	Number of Respondents	Responses Per Annum	Total Annual Responses	Burden Hour Per Response	Annual Burden Hours	Hourly Rate	Annual Cost
§ 92.201	State Designation of Local Recipients	51.00	1.00	51.00	1.50	76.50	\$41.78	\$3,196.17
§ 92.200	Private-Public Partnership	651.00	1.00	651.00	2.00	1,302.00	\$41.78	\$54,397.56
§ 92.201	Distribution of Assistance	651.00	1.00	651.00	4.00	2,604.00	\$41.78	\$108,795.12
§ 92.202	Site and Neighborhood Standards	651.00	1.00	651.00	2.00	1,302.00	\$41.78	\$54,397.56
§ 92.203	Income Determination	20,001.00	1.00	20,001.00	2.00	40,002.00	\$41.78	\$1,671,283.56
§ 92.203	Income Determination	350,000.00	1.00	350,000.00	0.75	262,500.00	\$41.78	\$10,967,250.00
§ 92.205(e)	Terminated Projects	540.00	1.00	540.00	5.00	2,700.00	\$41.78	\$112,806.00
§ 92.206	Eligible Costs - Refinancing	100.00	1.00	100.00	4.00	400.00	\$41.78	\$16,712.00
§ 92.210	Troubled HOME- Assisted Rental Projects	25.00	1.00	25.00	0.50	12.50	\$41.78	\$522.25
§ 92.251(a)	Property Standards – New Construction	10,200.00	2.00	20,400.00	3.00	61,200.00	\$41.78	\$2,556,936.00
§ 92.251(b)	Property Standards – Rehabilitation	15,300.00	2.00	30,600.00	2.00	61,200.00	\$41.78	\$2,556,936.00
§ 92.252	Qualification as affordable housing: Rental Housing:	3,200.00	1.00	3,200.00	5.00	16,000.00	\$41.78	\$668,480.00
§ 92.252(j)	Fixed and Floating HOME Rental Units	3,200.00	1.00	3,200.00	1.00	3,200.00	\$41.78	\$133,696.00
§ 92.253	Tenant Protections (including lease requirement)	20,001.00	1.00	20,001.00	5.00	100,005.00	\$41.78	\$4,178,208.90
§ 92.254	Homeownership - Median Purchase Price	80.00	1.00	80.00	5.00	400.00	\$41.78	\$16,712.00
§ 92.254	Homeownership - Alternative to Resale/recapture	100.00	1.00	100.00	5.00	500.00	\$41.78	\$20,890.00

Reg. Section	Paperwork Requirement	Number of Respondents	Responses Per Annum	Total Annual Responses	Burden Hour Per Response	Annual Burden Hours	Hourly Rate	Annual Cost
§ 92.254(a)(5)	Homeownership – Approval of Resale & Recapture	2,000.00	1.00	2,000.00	1.50	3,000.00	\$41.78	\$125,340.00
§ 92.254(a)(5)	Homeownership – Fair Return & Affordability	2.00	1.00	2.00	1.00	2.00	\$41.78	\$83.56
§ 92.254(f)	Homeownership program policies	651.00	1.00	651.00	5.00	3,255.00	\$41.78	\$135,993.90
§ 92.300	CHDO Identification	651.00	1.00	651.00	2.00	1,302.00	\$41.78	\$54,397.56
§ 92.300	Designation of CHDOs	480.00	1.00	480.00	1.50	720.00	\$41.78	\$30,081.60
§ 92.300	CHDO Project Assistance	651.00	1.00	651.00	2.00	1,302.00	\$41.78	\$54,397.56
§ 92.303	Tenant Participation Plan	12,513.00	1.00	12,513.00	10.00	125,130.00	\$41.78	\$5,227,931.40
§ 92.351	Affirmative Marketing	3,870.00	1.00	3,870.00	5.00	19,350.00	\$41.78	\$808,443.00
§ 92.354	Labor	20,001.00	1.00	20,001.00	2.50	50,002.50	\$41.78	\$2,089,104.45
§ 92.357	Debarment and Suspension	9,765.00	1.00	9,765.00	1.00	9,765.00	\$41.78	\$407,981.70
§ 92.501	HOME Investment Partnership Agreement (HUD 40093)	651.00	1.00	651.00	1.00	651.00	\$41.78	\$27,198.78
§ 92.502	Homeownership and Rental Set-Up and Completion	8,000.00	1.00	8,000.00	2.00	16,000.00	\$41.78	\$668,480.00
§ 92.502	Tenant-Based Rental Assistance Set-Up (IDIS)	4,400.00	1.00	4,400.00	5.50	24,200.00	\$41.78	\$1,011,076.00
§ 92.502	IDIS Access Request form (HUD 27055)	100.00	1.00	100.00	0.50	50.00	\$41.78	\$2,089.00
§ 92.502(a)	Required Reporting of Program Income	651.00	1.00	651.00	12.00	7,812.00	\$41.78	\$326,385.36
§ 92.504(c)	Written Agreement	20,001.00	1.00	20,001.00	5.00	100,005.00	\$41.78	\$4,178,208.90

Reg. Section	Paperwork Requirement	Number of Respondents	Responses Per Annum	Total Annual Responses	Burden Hour Per Response	Annual Burden Hours	Hourly Rate	Annual Cost
§ 92.504(d)(2)	Financial Oversight and HOME Rental projects	21,700.00	1.00	21,700.00	1.00	21,700.00	\$41.78	\$906,626.00
§ 92.508	Recordkeeping- Subsidy Layering and Underwriting	3,200.00	1.00	3,200.00	4.00	12,800.00	\$41.78	\$534,784.00
§ 92.508	Recordkeeping (Additional)	30,330.00	1.00	30,330.00	1.00	30,330.00	\$41.78	\$1,267,187.40
§ 92.509	Annual Performance Reports (HUD 40107)	651.00	1.00	651.00	2.50	1,627.50	\$41.78	\$67,996.95
§ 92.509	Management Reports - FY Match Report (HUD 40107A)	651.00	1.00	651.00	0.75	488.25	\$41.78	\$20,399.09
§ 92.550 § 91.525	HUD Monitoring of Program Documentation and Activities	651.00	1.00	651.00	0.25	162.75	\$41.78	\$6,799.70
	Direct Deposit Sign up form (SF 1199A)	15.00	1.00	15.00	0.25	3.75	\$41.78	\$156.68
	HOME ARP Allocation Plan	651.00	1.00	651.00	20.00	13,020.00	\$41.78	\$543,975.60
	Supportive Services Setup and Completion Activities	1,302.00	4.00	5,208.00	5.00	26,040.00	\$41.78	\$1,087,951.20
	Non-Congregate Shelter Setup and Completion Activities	651.00	1.00	651.00	15.00	9,765.00	\$41.78	\$407,981.70
	Totals	568,984.00				1,032,119.7 5		\$43,121,963.16

Annual cost is based on Actual Burden Hours (1,032,119.75) \* the hourly rate for a GS-12 (\$41.78)

- 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	Total Annual Responses	Burden Hour Per Respons e	Annual Burden Hours	Hourly Cost Per Respons e	Annual Cost
Consortia Applications and Certification	45.00	1.00	45.00	2.00	90.00	\$49.68	\$4,471.20
HOME Investment Partnership Agreement	651.00	1.00	651.00	1.00	651.00	\$49.68	\$32,341.68
IDIS Program Management Reports (Field Office)	43.00	12.00	516.00	14.00	7,224.00	\$49.68	\$358,888.32
IDIS Program Management Reports (Headquarters)	1.00	12.00	12.00	250.00	3,000.00	\$49.68	\$149,040.00
Management Reports (Field Office)	651.00	1.00	651.00	0.50	325.50	\$49.68	\$16,170.84
Management Reports (Headquarters)	651.00	1.00	651.00	0.25	162.75	\$49.68	\$8,085.42
	Totals				11,453.25		\$568,997.46

Annual cost is based on Actual Burden Hours (11,453.25) \* the hourly rate for a GS-13 (\$49.68)

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 of the HOME PRA due the ARP Act giving HOME additional funding as well as additional oversight responsibilities.

The HOME ARP statute and OMB Memorandum M-21-20 (March 19, 2021) imposes several data collection and reporting requirements on the Department and on program participants. Information on HOME-ARP activities, assisted properties, and program eligibility is needed to fulfill statutory requirements. This burden includes making the information available to HUD for monitoring the performance of program participants and ensuring compliance with all program requirements.

- 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 in 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