

**Supporting Statement for Paperwork Reduction Act Submissions  
Application for Community Compass Technical Assistance and Capacity Building Program  
NOFA and Awardee Reporting OMB # (2506-0197)**

**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 information collected provides for an application for HUD funds to provide technical assistance in response to demand from a variety of HUD program areas and field offices. This information is necessary to appropriately and objectively identify competition winners and monitor the expenditure of funds. Sufficient information is required for the Department to base a judgment as to the technical capability of the prospective providers in providing technical assistance to HUD grantees. The information also is used to assign selected awardees tasks under the cooperative agreement on a demand-response basis. The administrative requirements that authorize the collection of this information are contained within 2 CFR Part 200. These regulations address activities and information that must be provided by applicants and awardees, as well as those actions that HUD must take, and information HUD must review, during the pre-award, award, and post-selection phases of the competition and award management.

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.

This information has been and will continue to be used to determine the most qualified technical assistance providers best able to offer HUD the ability to shape its available technical assistance resources to assist HUD grantees with effective, coordinated, neighborhood and community development strategies to revitalize and strengthen communities nationwide through structural, social and economic improvements. Additionally, the information collected has been and will continue to be used to evaluate the provider's performance and progress during the period of performance of the award.

The information is also used to support payment requests from technical assistance providers to HUD for reimbursements of eligible expenses. Technical assistance providers develop work plans that are submitted to HUD for the applicable program area to which they are providing products and/or services. As a result of the FY2017 competition, approximately 230 work plans are currently in place which require quarterly reporting and monthly recordkeeping, as well as billing and payment processing for expenses.

**Other Forms.**

Form Number	Form Name	Form Description
SF-424 Key Contacts	Application for Federal Assistance Key Contacts (OMB Number: 4040-0010)	This is a standard form required for applications under discretionary programs. This form provides the applicant's contact information, EIN Number, DUNS number, amount of funds requested, and other information regarding eligibility requirements. Provider is required to complete this form once a year which provides the Key Contact information for an organization
SF-425	Federal Financial Report (SF-425) OMB #: 4040-0014	This is a standard form required quarterly for OMB-approved governmentwide data elements for collection of financial information.
SF-LLL	Disclosure of Lobbying Activities Certification -- Submit via Grants.gov as part of the application package	Completion of this form is required to disclose lobbying activities pursuant to 31 CFR U.S.C 1352. The Lobbying Form certification must be submitted by applicants who are requesting more than \$100,000 in this NOFA; as the minimum award for this NOFA is \$250,000, all applicants to this NOFA must submit the Lobbying Form. The Lobbying Form certification can be found in the NOFA application kit on Grants.gov. Even if you are not

		required by 24 CFR Part 87 to submit an SF-LLL, you must still submit a Lobbying Form certification. Please note: Federally-recognized Indian Tribes applying for funding under this NOFA are not required to submit this form. State-recognized Tribes must submit this form.
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-50070	Certification for a Drug-Free Workplace	Applicant must complete this form to certify that they will or will continue to provide a drug-free workplace.
HUD-4131	Application Summary	Applicant is required to complete this form which is a summary of the applicant's organization and its funding request.
HUD-4134	Experience of Staff, Contractors, and Consultants	Applicant is required to complete this form by entering the name, organization, and qualifications for each staff person, contractor, and consultant, as well as each individual's years of experience for each HUD Office by program/topic.
HUD-4132	Capacity and Interest	Applicant is required to complete this form in order to verify the applicant's Capacity and Interest for each HUD Office by program/topic.
HUD-4137	Community Compass - Work Plan – Administration	Provider is required to use this template for the creation/submission of their Administration Work Plan.
HUD-4140	Community Compass - Work Plan – Coordination	Provider is required to use this template for the creation/submission of their Coordination Work Plan.
HUD-4319	Community Compass – Work Plan (other than Administration or Coordination)	Provider is required to use this template for the creation/submission of all work plans (excluding Administration or Coordination work plans).
HUD-4138	Community Compass - Monthly Report	Provider must submit this form monthly. The form contains a description of the actual work performed for costs associated with the payment request, by work plan.
HUD-4133	Community Compass – High Wage Rate Worksheet	Provider is required to use this template for new staff, contractors, and consultants with a total hourly rate of \$200.00 and greater.
HUD-4136	Community Compass – Property Statement	Provider is required to complete this form at the time of closeout of the award. This reflects the status of real and personal property paid for in whole, or in part, from the award.
HUD-4135	Community Compass – Closeout of Award Certification	Provider is required to submit this form at the time of closeout of the award. The Provider is certifying that all funds have been used in accordance with the award agreement and that any income earned has been returned to the Federal government.

- 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.

In accordance with the requirements stated in the NOFA, applicants are able to submit their applications electronically through Grants.gov. In addition, HUD accepts electronic transmission of work plans, payments (which include the submission of the Monthly Report), and all other required reports (whether quarterly or monthly) from our awardees.

- 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.

NOFA application submission forms will be collected at the time of the NOFA (on a 2-year cycle) NOFA application submission responses are program specific and are the only assessment tools available for HUD to determine the relevant and up-to-date capacity, experience and expertise of our TA applicants. The reporting information collected is engagement- and task-specific, and, therefore, unique to each awardee's TA award.

- 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 have a significant economic impact on small businesses.

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.

Less frequent data collection would damage HUD's ability to effectively manage technical assistance efforts and would not be consistent with government wide standards for the management of cooperative agreements. The loss of this collection mechanism would severely impair HUD's ability to assess TA providers and therefore reduce the efficiency with which we can provide sound and relevant assistance to HUD grantees. The impact would be felt at the local level through less effective programming and reduced provider capacity. Failure to collect application data would limit HUD's ability to incorporate timely knowledge about the applicant's recent activity, successes and failures, and therefore, impede HUD's ability to assess the skills and qualifications of applicants. Also, failure to collect awardee's monthly invoice and activity reports, including engagement status data, would significantly impair HUD's ability to assess performance, make adjustments, and address significant challenges that arise during the award period of performance.

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; **Yes, TA providers submit payment request for reimbursement of services on a monthly basis, along with monthly activity reports describing the services performed.**
- 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; or **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**

Recordkeeping, for the purposes of providing justification for the reimbursements of expenditures as identified in the applicant's payment request, may be necessary to be conducted on a monthly basis as consistent with monthly payment requests.

8. If applicable, provide a copy and identify the date and page number of the 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.

Published in the Federal Register on April 26, 2016, Vol 81, page 24628. Title of Information Collection: Application for Community Compass TA and Capacity Building Program NOFA. OMB Approval Number: 2506-0197. Type of Request: Extension. Form Number: Sf-424, SF424CB, SF-424CBW. No comments were received from the publication.

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

Applicants and awardees do not receive gifts or any additional forms of payments outside of the terms of the award.

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

The applicants are not provided any assurances of confidentiality. Highest ranking applications are posted on grants.gov, with any personally identifiable information redacted. However, there is no financial information required by the NOFA but is required during the execution of the award.

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 asked of respondents that are 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 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 NOFA	Burden Hour Per Response	Total NOFA Burden Hours	Hourly Cost Per Response*	Total Cost
Pre-Award							
Application	60.00	1.00	60.00	100.00	6,000.00	\$60.74	\$364,440.00
Pre-Award							
SF424 Application for Federal Assistance Key Contact	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SF-LLL Disclosure of Lobbying Activities	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HUD-2880 Applicant/Recipient Disclosure/Update Report	60.00	1.00	60.00	2.00	120.00	\$60.74	\$7,288.80
HUD-50070 Certification for a Drug-Free Workplace	60.00	1.00	60.00	0.17	10.20	\$60.74	\$619.55
HUD-4131 (Application)	60.00	1.00	60.00	0.50	30.00	\$60.74	\$1,822.20

Summary)							
HUD-4134 (Experience of Staff, Contractors, and Consultants)	60.00	1.00	60.00	8.00	480.00	\$60.74	\$29,155.20
HUD-4132 (Capacity and Interest)	60.00	1.00	60.00	0.50	30.00	\$60.74	\$1,822.20
SF-LLL Disclosure of Lobbying Activities *	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Post-Award							
Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
SF-425 Federal Financial Report (SF-425) OMB #: 4040-0014*	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HUD-4147 Community Compass - Work Plan – Administration	30.00	1.00	30.00	1.00	30.00	\$60.74	\$1,822.20
HUD-4138 Community Compass - Work Plan – Coordination	30.00	1.00	30.00	1.00	30.00	\$60.74	\$1,822.20
HUD-4139 Community Compass – Work Plan (other than Administration or Coordination)	30.00	10.00	300.00	16.00	4,800.00	\$60.74	\$291,552.00
HUD-4140 (Community Compass – Monthly Report)	30.00	12.00	360.00	30.00	10,800	\$60.74	\$655,992.00
HUD-4136 (Community Compass – Property Statement)	30.00	1.00	30.00	0.50	15.00	\$60.74	\$911.10
HUD-4135 (Community Compass – Closeout of Award Certification)	30.00	1.00	30.00	0.50	15.00	\$60.74	\$911.10
HUD-4133 (Community Compass- High Wage Rate Worksheet)	30.00	1.00	30.00	8.00	240.00	\$60.74	\$14,577.60
<b>Total</b>	---	---	---	---	<b>22,600.20</b>	\$60.74	<b>\$1,372,736.15</b>

\*Per OMB, Standard Form should be listed, but the burden does not need to be included as part of the collection.

\*\*Estimated cost for respondents is calculated from the June 2018 Department of Labor Bureau of Labor Statistics report on Employer Costs for Employee Compensation determined that the hourly rate of management, professional and related wages and salaries averaged \$41.71 per hour plus \$19.03 per hour for fringe benefits for a total \$60.74 per hour.

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 consider 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 no additional costs to the applicant.

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 Hour Per Response	Annual Burden Hours	Hourly Cost Per Response*	Annual Cost
Pre-Award							
Application	60.00	1.00	60.00	100.00	6,000.00	\$61.77	\$370,620.00
Post-Award							
Work Plans	30.00	10.00	300.00	18.00	5,400.00	\$61.77	\$333,558.00
Reports	30.00	4.00	120.00	6.00	720.00	\$61.77	\$44,474.40
Recordkeeping	30.00	12.00	360.00	6.00	2,160.00	\$61.77	\$133,423.20
Total	---	---	---	---	14,280.00	\$61.77	\$882,075.60

\*Annual Cost Per Response is calculated at a GS-14 Step 4 with the approximate salary of government employee involved in the review and subsequent monitoring of the applicants.

Applicants submit applications to the NOFA which are reviewed by HUD staff. Based on previous submissions, we anticipate 60 applicants responding to the NOFA with approximately 30 awardees. Each award will carry an average of 10 work plans that are each reviewed by HUD staff for approval and/or amended changes. The HUD staff also review quarterly reports from the awardees. Additionally, the awardees are required to submit payment request and corresponding activity reports on a monthly basis to be reviewed by HUD staff and annually submit a key contacts report.

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 reinstatement of a currently approved collection with increased burden hours and a higher number of respondents.

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 information that is submitted will not be published. However, the names and funding amounts of awardees selected through this NOFA competition will be published in the Federal Register (excluding scoring information) 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.

There is no request to prohibit displaying the expiration date.

18. Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

There is no exception to the certification statement. Even if no forms are used to collect the information, respondents must be provided this information. Be prepared to explain how this requirement is met.

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