

Supporting Statement for Paperwork Reduction Act Submissions
Information Collection:
Promise Zones Reporting
OMB Number 2501-0035

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 a reinstatement with change of a previously approved collections. The collection of information is necessary to ensure the success of the Promise Zone initiative. The information collection will allow HUD to: 1) track the progress made by each Promise Zone towards completing the 10-year plan submitted as part of the application process; 2) to quantify the monetary impact on Promise Zone communities; and 3) to facilitate communication between local and federal partners. HUD proposes that Promise Zone Lead Organizations submit minimal reports and documents to support collaboration and problem solving between local and federal partners. These reports will also assist in communications and stakeholder engagement, both locally and nationally.

Under the Promise Zones initiative, the federal government invests in and partners with high-poverty urban, rural, and tribal communities to create jobs, increase economic activity, improve educational opportunities, leverage private investment, and reduce violent crime. Additional information about the Promise Zones initiative can be found at <https://www.hudexchange.info/programs/promise-zones/>, and questions can be addressed to promiszone@hud.gov.

HUD designated fourteen communities as urban Promise Zones between 2014 and 2016 under FR 5774-N-01, FR 5774-02, and FR 5774-N-04. The federal administrative duties pertaining to these designations shall be managed and executed by HUD for ten years from the designation dates pursuant to sections 2 and 3 of the HUD Act, 42 U.S.C. §§ 3531-32¹, to assist the President in achieving maximum coordination of the various federal activities which have a major effect upon urban community, suburban, or metropolitan development; to develop and recommend the President policies for fostering orderly growth and development of the Nation's urban areas; and to exercise leadership, at the direction of the President, in coordinating federal activities affecting housing and urban development.

- 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.**

¹ Attachment 1 - [US Code Title 42 Chapter 44 Sec.3531](#)

The Promise Zone designated community (lead organization) will submit the report and supporting documentation electronically to the Community Liaison (a local HUD employee assigned to work directly with the Promise Zone community). The purpose of the collection is to track the progress made by the Promise Zone community towards completing the 10-year plan submitted as part of the Promise Zone application process. To track the impact of the Promise Zone initiative, it is critically important to accurately document the amount of grant assistance and investment that has been secured for Promise Zone activities and Promise Zone partners. The collection will also facilitate communication between local and federal partners on a timely basis to support collaboration and problem solving. These reports will also assist in communications and stakeholder engagement, both locally and nationally. HUD templates for each of these reports are included in this package.

HUD FORM 9916 Annual Report Narrative: Using the HUD template, the Promise Zone Lead Organization shall submit an Annual Report that documents the Promise Zone's accomplishments over the previous year and lays out priorities for the next year.

HUD FORM 9917 Quarterly Investment & Assistance Report: On a quarterly basis, Promise Zone Lead Organizations shall submit a cumulative spreadsheet listing federal and non-federal grants or investments (including technical assistance, in-kind assistance/donations, and capital investments) for which it and its Promise Zone partners have applied, or have been notified of an award or a denial on a previous application. As a cumulative spreadsheet, the updates for that quarter will be flagged by the date that the row in the spreadsheet was last updated. For example, if a grant was awarded in the last quarter, the two changes to that grant's row in the spreadsheet would be 1) an official award amount, and 2) the Date Last Updated would now be sometime in the last quarter.

HUD FORM 9918 Monthly Federal Grants Report: This form has been removed from this collection and retired from circulation; HUD 9917 will now collect the information previously captured in this report.

HUD FORM 9919 Quarterly Report of the Annual Priorities: On a quarterly basis the Promise Zone Lead Organization shall submit this spreadsheet to their HUD Community Liaisons, who will keep a record of the progress. Using a HUD template, Promise Zone Lead Organizations shall provide an update on Promise Zone partners' activities for the past quarter, including milestones and accomplishments, major challenges, upcoming plans and priorities, and desired federal assistance. For the quarter that coincides with the end of the fiscal year on September 30th, the Promise Zone should submit an Annual Priorities plan for the upcoming fiscal year, rather than a quarterly progress report on the last quarter. Any updates on progress should be captured in the Annual Narrative report.

Quarterly Spotlights (Public Communication Materials): Finally, Promise Zone Lead Organizations are also asked to provide one to two Spotlights (i.e. success stories) per quarter. There is no HUD Form number for these spotlights. However, the loose template is a word document with one to four paragraphs of text and one to two pictures. These spotlights will document the progress being made and recent successes in the Promise Zone.

As a part of these spotlight pictures, the Promise Zones should submit the necessary photo releases/approvals.

HUD-XXXX “New Neighborhood Amenities” form: This form has been removed from this collection and retired from circulation because it was used minimally.

- 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.**

All reports will be collected electronically by the respective HUD Community Liaison. The HUD Community Liaison then submits the report documents into a SharePoint site. To reduce reporting burden, we would like to explore ways to use Office 365 or another system to incorporate a cloud-based system for the submission of documents.

- 4. Duplication of Effort:** There is no duplication of effort. Information collected is unique to each type of collection and does not duplicate any information or method. In developing this information collection, HUD and other agencies have built upon the experience with programs in relevant policy areas that are administered by multiple agencies, including the Choice Neighborhoods, Promise Neighborhoods, Byrne Criminal Justice Innovation programs, and Rural Development programs.
- 5. Impact on Small Business and Small Entities:** These information collections have no impact on small businesses or other entities.
- 6. Consequence of Less Frequent Collection:** The designated communities will benefit from the frequency of collection because the information will be shared with interagency partners to support the community priorities. Without the information, it would inhibit the ability of federal agencies to assist the Promise Zones. Information will be shared with thousands of interested communities that are doing similar Place-Based community revitalization work.
- 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 often than quarterly;** Not applicable
 - **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 that 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 secrets, 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

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 on 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 may preclude consultation in a specific situation. These circumstances should be explained. Federal Register Notice and Public Comments:**

HUD published a 60-day Notice of Proposed Information Collection for Public Comments in the *Federal Register*, Pages 46865-46866, on 08/20/21. One public comment was received, supporting the changes made in the Information Collection. No subsequent changes were therefore made.

- 9. Payment/Gifts to Respondents:** No payments or gifts are provided to respondents for any of these information collections.
- 10. Assurances of Confidentiality:** Assurance of confidentiality is neither provided nor needed for any of these information collections.
- 11. Questions of a Sensitive Nature:** No sensitive questions are being asked for any of these information collections.

12. Estimate of Annual Burden Hours for Information Collection: The chart below outlines the burden associated with the various aspects of the Promise Zones initiative and a breakout of the forms associated with each portion of that burden.

For Promise Zones, the burden hours per response total is 42 hours. The total annual burden hours are estimated to be 1,932 hours. The total annual cost is \$69,803.16, based on the hourly wage of Social and Community Service Managers - \$36.13 per hour.²

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Annual Report Narrative (9916)	14	1	14	10	140	\$36.13	\$5,058.20
Quarterly Investments and Assistance report (9917)	14	4	56	20	1,120	\$36.13	\$40,465.60
Quarterly Progress of Annual Priorities report (9919)	14	4	56	10	560	\$36.13	\$20,232.80
Quarterly Spotlights (Public Communications materials)	14	4	56	2	112	\$36.13	\$4,046.56
Total			182	42	1,932		\$69,803.16

13. Provide an estimate for the total annual cost burden to respondents or record keepers 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 and 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 collections 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**

² https://www.bls.gov/oes/current/oes_nat.htm#11-0000

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 start-up or additional costs to the respondents other than those reported in Item 12 above in the Burden Cost Column. After taking a sample of Promise Zones, the cost of contracting out information collection services ranges between \$15,000 and \$60,000 per Promise Zone, totaling between \$210,000 and \$840,000 for all fourteen of the urban Promise Zones. There are not additional and management costs.

14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The development of the information collection instrument has required, in the past five years, about 16 hours per week of Promise Zone HQ team engagement. Because of the suggested changes, the level of effort is now estimated to be 11.5 hours per week and to cost an average of \$36,415.00 annualized, not accounting for the work required to support the Promise Zone communities outside of processing the reports and communications materials. The hourly cost is at the rate of a GS 14-1 in Washington DC.³

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Annual Report Narrative (9916)	14	1	14	7	98	\$60.49	\$5,928
Quarterly Investments & Assistance report (9917)	14	4	56	2	112	\$60.49	\$6,775
Quarterly Progress of Annual Priorities report (9919)	14	4	56	4	224	\$60.49	\$13,550
Quarterly Spotlights (Public Communications materials)	14	4	56	3	168	\$60.49	\$10,162
Total			182	16	602		\$36,415

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

³ <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB.pdf>

This is a reinstatement with change of a previously approved collections. The HUD-XXXX “New Neighborhood Amenities” form, from the original 2501-0035 OMB approval, has been removed from the collection because the form was never used. Additionally, HUD Form 9917 (Bi-annual Non-Federal Investment report) and HUD Form 9918 (Monthly Federal Grants Report) have been merged so that HUD 9917 will now collect the information previously captured in HUD 9918. HUD 9917 has therefore been reformatted to collect this new information and to be more user-friendly; HUD 9918 has been removed and retired from this collection. HUD-9917 will now be called the Quarterly Investments and Assistance Report; it will be collected quarterly and submitted cumulatively. These changes will reduce unnecessary copying and pasting, reformatting, and file management, and will ultimately reduce the burden on respondents.

Adjustments reported due to a stabilized number of program participants, HQ staff restructuring, program evaluation, inflation, and OPM federal wage adjustments for 2022.

16. For collections 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.

Notification of final reporting and communications tools has been made via policy guidance issued to the fourteen Promise Zone lead organizations. The collection will take place over the course of the designation.

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.

Not applicable, as HUD is not seeking approval for this.

18. Exceptions to Certification Statement:

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods: There are no collections of information that employ statistical methods.