

Supporting Statement for Paperwork Reduction Act Submissions

Information Collection:

Revitalization of Severely Distressed Public Housing (HOPE VI) and Main Street Grant Program

A. Justification

1. The following information collections are required to administer the HOPE VI and HOPE VI Main Street programs. The HOPE VI program has sunset. However, a Notice of Funds Availability (NOFA) for the HOPE VI Main Street program announces approximately \$500,000 annually available to units of local government with populations of 50,000 or below and with 100 or less physical public housing units. HOPE VI Main Street is funded through Choice Neighborhoods Initiative appropriations. Although the HOPE VI program is no longer funded, approximately 35 HOPE VI Implementation grants are still active, and 55 grants are still being closed out. The HOPE VI Program, through its Revitalization funding component, assists PHAs in improving the living environment for public housing residents of severely distressed public housing projects through the demolition, rehabilitation, reconfiguration, or replacement of severely distressed public housing projects (or portions thereof); in revitalizing sites in which public housing sites are located and contributing to the improvement of the surrounding community; in providing housing that avoids or decreases the concentration of very low-income families; and in building sustainable communities. The HOPE VI Main Street funding component of the HOPE VI program assists units of local government in furnishing affordable housing in the traditional city centers or Main Street Areas. The primary purpose of this program is to jumpstart downtown rejuvenation efforts.

The HOPE VI program was created by the Department of Veterans Affairs and Housing and Urban Development, and Independent Agencies Appropriations Act, 1993 (Pub. L. 102-389), approved on October 6, 1992 (the 1993 Appropriations Act). The HOPE VI Main Street program was created by the HOPE VI Program Reauthorization and Small Community Mainstreet Rejuvenation and Housing Act of 2003 (Pub.L.108-186, 117 Stat. 2685, approved December 16, 2003), which amended Section 24 of the Housing Act of 1937.

Program authority for the HOPE VI program is provided by Section 24 of the U.S. Housing Act of 1937, as amended by Section 535 of the Quality Housing and Work Responsibility Act of 1998 (Pub. L. 105-276, 112 Stat. 2461, approved October 21, 1998) and the HOPE VI Program Reauthorization and Small Community Mainstreet Rejuvenation and Housing Act of 2003 (Pub.L.108-186, 117 Stat. 2685, approved December 16, 2003). The statute authorizes the collection of information in order for HUD to award and manage grants.

Funding authority for HOPE VI Planning, Revitalization, and Demolition grants had been provided by annual appropriations under the HOPE VI heading until 2011, when the HOPE VI program sunset and was replaced with the Choice Neighborhoods Initiative. Starting in 2012, and continuing to the present, the HOPE VI Main Street grant program remains authorized under Section 24(n) of the 1937 Act and has continued to be funded by the “Choice Neighborhoods Initiative”¹ appropriations. These appropriations have required, and continue to require, the Choice Neighborhoods Initiative to be “...(subject to section 24 of the United States Housing Act of 1937 (42 U.S.C. 1437v), unless otherwise specified under this heading)...”²

The HOPE VI program is subject to program regulations, including 24 CFR 905.600, and other applicable regulations. The HOPE VI Main Street program does not have program regulations; however, it is subject to other applicable regulations such as 2 CFR part 200 and 24 CFR part 50.

¹ Consolidated Appropriations Act, 2018, P.L. 115-141, Id.

Both programs are governed by each Fiscal Year's NOFA, as published in the [Grants.gov](https://www.grants.gov) website, and the Grant Agreement executed between each grant recipient and HUD.

2. Eligible units of local government interested in obtaining HOPE VI Main Street grant funds are required to submit applications to HUD, as explained in the NOFAs. This information collection includes the information needed from applicants to determine which applicants should be funded, and information necessary to manage the HOPE VI Main Street grants and the remaining HOPE VI Implementation grants. The information provided demonstrates the applicants' plans to implement the grant requirements. The HOPE VI Main Street NOFA information will be used by HUD's Office of Public Housing Investments staff to evaluate threshold requirements and rate and rank grant applications. Applicants that receive grant funds are required to report to HUD quarterly on their progress, enabling HUD to manage and monitor the program. This information collection also includes the data needed to fulfill this reporting requirement.

3. Technology applied to the collection: The quarterly information collection is captured via email. Since FY 2005, the Department has required NOFAs to be submitted electronically via [Grants.gov](https://www.grants.gov). Automation supports 100% of the application process; 100% of the Quarterly reporting (except where original signatures are required).

4. Duplication of Effort:

There is no duplication of effort, excluding Standard Forms used by [Grants.gov](https://www.grants.gov) in the NOFA. Information collected is unique to each type of collection and does not duplicate any similar information or method.

5. Impact on Small Business and Small Entities:

These information collections have no impact on small businesses or other entities other than local government NOFA applicants and grantees.

6. Consequence of Less Frequent Collection:

The Federal statutory mandate would not be met if the collection is not conducted. The information collection is necessary to the continuation of the HOPE VI and HOPE VI Main Street programs and so that the available funds may be awarded to successful applicants for HOPE VI Main Street program grants. Section 24 of the Housing Act of 1937 also requires annual reporting to Congress on programs authorized by that statute.

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

- requiring respondents to report information to the agency more 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 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 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 these information collections to be conducted inappropriately.

8. Federal Register Notice and Public Comments:

HUD published a Notice of Proposed Information Collection for Public Comment in the Federal Register, Volume 83; No. 150, Page, 38162, on August 3, 2018. The public was given until September 2, 2018 to submit comments on the proposed information collection. HUD received no comments on this proposed collection.

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 HOPE VI and HOPE VI Main Street grant programs and a breakout of the forms associated with each portion of that burden.

Costs to the respondents to complete these information collections will not exceed those incurred by regular grant administration, planning and management. Under Non-NOFA collections in the chart, the number of respondents performing Quarterly Progress Reporting has decreased as grants are completed and closed out. The number of respondents includes respondents of both the HOPE VI Implementation and HOPE VI Main Street programs. The form HUD-52825-A, HOPE VI Budget Form, is collected bi-annually in the HOPE VI Main Street Notice of Funding Availability (NOFA) and on a sporadic basis as project development proceeds. The HUD-53001A, HOPE VI Actual Cost Certificate, is a grant closeout form and is collected at random times.

Information Collection
Main Street NC Narrative Exhibit
Main Street NO 52861 Application Data Sheet
Main Street NC Project Area Map
Main Street NC Program Schedule
Main Street NC Photographs of
Main Street NC Five-year Pro-f
Main Street NOFA Site Plan and Unit Layout

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Collection	Respondents	Frequency per Annum	Responses per Annum	Burden per Response	Burden Per Annum
HOPE VI Main Street Application					
Main Street NOFA Narrative Exhibits	5	0.5	2.5	80	200
Main Street NOFA 52861 Application Data Sheet	5	0.5	2.5	15	37.5
Main Street NOFA Project Area Map	5	0.5	2.5	1	2.5
Main Street NOFA Program Schedule	5	0.5	2.5	4	10
Main Street NOFA Photographs of site	5	0.5	2.5	5	12.5
Main Street NOFA Five-year Pro-forma	5	0.5	2.5	5	12.5
Main Street NOFA Site Plan and Unit Layout	5	0.5	2.5	10	25
Subtotal	35		17.5		300
Non-NOFA Collections					
Quarterly Reporting	35	4	140	1	140
52825-A HOPE VI Budget updates	40	1	40	1	40
53001-A Actual HOPE VI Cost Certificate	55	0.5	55	27.5	27.5
Subtotal	130		235		207.5
Total Burden			252.5		507.5

13. Cost Burden of Information Collection:

There are no start-up or additional costs to the respondents. The GS-14-10 base pay wage of \$58 per hour was used for all of the collections.

Collections	Burden Per Annum	Hourly Cost per Response	Annual Cost
HOPE VI Main Street Application			
Main Street NOFA Narrative Exhibits	200	\$58	\$11,600
Main Street NOFA 52861 Application Data Sheet	27.5	\$58	\$2,175
Main Street NOFA Project Area Map	2.5	\$58	\$145
Main Street NOFA Program Schedule	10	\$58	\$580
Main Street NOFA Photographs of site	12.5	\$58	\$725
Main Street NOFA Five-year Pro-forma	12.5	\$58	\$725
Main Street NOFA Site Plan and Unit Layout	25	\$58	\$1,450
Subtotal	300		\$17,400
Non-NOFA Collections			
On-line Quarterly Reporting	140	\$58	\$8,120
52825-A HOPE VI Budget updates	40	\$58	\$2,320
53001-A Actual HOPE VI Cost Certificate	27.5	\$58	\$1,595
Subtotal	207.5		\$12,035
Total Burden			
	507.5		\$29,435

14. Annualized Cost to Federal Government:

We do not estimate that there will be any additional costs to the Federal government for any of these information collections.

15. Changes or Adjustments to OMB Form 83-I:

Reinstatement of expired OMB ICR Tracking Number 2577-0208.

The program title has changed from “HOPE VI Application” to “HOPE VI and HOPE VI Main Street Program,” to better describe this collection. Now that the majority of HOPE VI grants have been closed, the Main Street NOFA accounts for most of the burden. HOPE VI Main Street funds continue to be appropriated through the Choice Neighborhoods Initiative appropriations.

16. Publication of Information Collection Results:

Information collection results will not be published.

17. Expiration Date:

The OMB approval number and date will appear on the HUD-prescribed forms.

18. Exceptions to Certification Statement:

There are no exceptions to the certification statement identified in item 19.

B. Collections of Information Employing Statistical Methods

There are no collections of information that employ statistical methods.