

Supporting Statement for Paperwork Reduction Act Submissions
Housing Trust Fund (HTF)
(OMB# 2506-0215)

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 Housing Trust Fund (HTF) program was established under section 1338 of the Federal Housing Enterprises Financial Safety and Soundness Act of 1992, as amended (12 U.S.C. 4568) (the “HTF Statute”). In general, under the HTF program, the U.S. Department of Housing and Urban Development (HUD) allocates funds by formula to eligible grantees, as defined in 24 CFR 93.2, to increase and preserve the supply of decent, safe, sanitary, and affordable housing, with primary attention to rental housing for extremely low-income and very low-income households, including homeless families.

The HTF Statute imposes many data collection and reporting requirements on the Department and on grantees and program participants. Information on assisted properties as well as on the owners or tenants of the properties is needed to fulfill the statutory requirements. This burden includes making the information available to HUD for monitoring the performance of the grantees and program participants and ensuring compliance with all program requirements.

The data collection elements addressed in this document are from the HTF program regulations in 24 CFR part 93, which can be found at <https://www.ecfr.gov/current/title-24/subtitle-A/part-93>.

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 HTF grantees to collect information on the activities undertaken with HTF funds.

In accordance with 12 USC 4568(e)(2), HUD requires grantees to collect information on the activities undertaken with HTF funds to be reviewed by HUD staff. Data is entered into the Integrated Disbursement and Information System (IDIS) by grantees for specific projects, including: address, financial management, owner/developer, and beneficiary data. HUD uses the data collection to monitor the use of HTF funds, and to make sure grantees and program participants are complying with statutory and regulatory 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 HTF program information (collection of data on funds management, project and tenant characteristics, and owner data) has been automated by IDIS. IDIS eliminates the need for grantees to submit paper reports. The submission of the Action Plan, including the HTF Allocation Plan and Action Plan-related documents by grantees to the Field Office is also automated. All HTF data elements of the IDIS systems and Consolidated Plan are required under the HTF Statute, 24 CFR part 93, and related authorities.

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, therefore, unique to each grantee's HTF program. Other recordkeeping requirements (e.g., property standards, written agreements, tenant protections) are project- or program-specific and unique to local HTF 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 describe any methods used to minimize burden.

There is no 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 grantees to draw down HTF funds from the U.S. Treasury and to ensure that HTF funds are used for their authorized purposes and on eligible activities and projects. If the data is collected less frequently, HUD and the grantees will be potentially in violation of HTF statute and/or 2 C.F.R. Part 200, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

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.

HTF regulations at 24 CFR 93.402 and 24 CFR 93.407 require grantees to provide financial recordkeeping and performance reporting in IDIS to ensure projects are progressing and HUD funds are being used effectively. These reports are required monthly.

- 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; 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 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.

The Federal Register announcing this collection of information was posted on April 20, 2022 (Volume 87, Number 76, Page 23534). No comments have been received.

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

N/A - 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.

Grantees will collect and maintain records of information. Information on activities and expenditures of grant funds is public information and is generally available for disclosure. Grantees 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.

N/A. 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.

NOTE: Please see attached Burden Hours Statement and proposed location for posting Statement.

Regulatory Section	Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
§ 93.100(a)	Notification of intent to participate	56.00	1.00	56.00	4.00	224.00	\$43.04	\$9,640.96
31 USC § 3512	HUD Form 27055	56.00	1.00	56.00	0.50	28.00	\$43.04	\$1,205.12
§ 93.100(b)	Submission of Consolidated Plan	56.00	0.20	11.20	40.00	448.00	\$43.04	\$19,281.92
§ 91.220	Action Plan	56.00	1.00	56.00	10.00	560.00	\$43.04	\$24,102.40
§ 93.101	Distribution of assistance	56.00	1.00	56.00	4.00	224.00	\$43.04	\$9,640.96
§ 93.150(a)	Site and Neighborhood Standards	56.00	1.00	56.00	4.00	224.00	\$43.04	\$9,640.96
§ 93.150(b)	New rental housing site and neighborhood	56.00	1.00	56.00	5.00	280.00	\$43.04	\$12,051.20

Regulatory Section	Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
	requirements							
§ 93.200(b)	Establishment of terms of assistance	56.00	1.00	56.00	4.00	224.00	\$43.04	\$9,640.96
§ 93.200(d)	Terminated projects	1.00	1.00	1.00	20.00	20.00	\$43.04	\$860.80
§ 93.201(b)(2)	Establish refinancing guidelines	56.00	1.00	56.00	4.00	224.00	\$43.04	\$9,640.96
§ 93.300(a)	Establish maximum per-unit development subsidy amount	56.00	1.00	56.00	4.00	224.00	\$43.04	\$9,640.96
§ 93.300(b)	Underwriting and subsidy layering	168.00	1.00	168.00	4.00	672.00	\$43.04	\$28,922.88
§ 93.301(a)	Property standards - New construction	56.00	1.00	56.00	3.00	168.00	\$43.04	\$7,230.72
§ 93.302(b)	Establish rent limitations	56.00	1.00	56.00	4.00	224.00	\$43.04	\$9,640.96
§ 93.302(c)	Establish utility allowance	56.00	1.00	56.00	4.00	224.00	\$43.04	\$9,640.96
§ 93.302(d)(1)	Establish affordability requirements	56.00	1.00	56.00	4.00	224.00	\$43.04	\$9,640.96
§ 93.302(d)(3)	Establish preemptive procedures before foreclosure	56.00	1.00	56.00	4.00	224.00	\$43.04	\$9,640.96
§ 93.302(e)(1)	Initial income determination	1821.00	1.00	1821.00	1.00	1821.00	\$43.04	\$78,375.84
§ 93.302(e)(1)	Annual income determination	5600.00	1.00	5600.00	0.25	1400.00	\$43.04	\$60,256.00
§ 93.350(a)	Nondiscrimination and equal opportunity procedures	56.00	1.00	56.00	8.00	448.00	\$43.04	\$19,281.92
§ 93.350(b)(1)	Affirmative marketing procedures	56.00	1.00	56.00	10.00	560.00	\$43.04	\$24,102.40
§ 93.351	Lead-based paint	56.00	1.00	56.00	1.00	56.00	\$43.04	\$2,410.24
§ 93.352	Displacement, relocation, and acquisition procedures	56.00	1.00	56.00	4.00	224.00	\$43.04	\$9,640.96

Regulatory Section	Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
§ 93.353	Conflict of interest adjudication	2.00	1.00	2.00	4.00	8.00	\$43.04	\$344.32
§ 93.354	Funding Accountability and Transparency Act	56.00	12.00	672.00	1.00	672.00	\$43.04	\$28,922.88
§ 93.356(b)	VAWA notification requirements	56.00	1.00	56.00	4.00	224.00	\$43.04	\$9,640.96
§ 93.356(d)	VAWA lease term/addendum	56.00	1.00	56.00	4.00	224.00	\$43.04	\$9,640.96
§ 93.356(f)	VAWA Emergency transfer plan	56.00	1.00	56.00	4.00	224.00	\$43.04	\$9,640.96
§ 93.402(b)(1)	IDIS - Project set-up	168.00	1.00	168.00	1.00	168.00	\$43.04	\$7,230.72
§ 93.402(c)(1)	IDIS - HTF drawdowns	168.00	1.00	168.00	1.00	168.00	\$43.04	\$7,230.72
§ 93.402(d)(1)	IDIS - Project completion	168.00	1.00	168.00	1.00	168.00	\$43.04	\$7,230.72
§ 93.403(a)	Program income administration	56.00	1.00	56.00	4.00	224.00	\$43.04	\$9,640.96
§ 93.403(b)(1)	Repayment for ineligible activities	2.00	1.00	2.00	5.00	10.00	\$43.04	\$430.40
§ 93.404(b)	Written agreement	168.00	1.00	168.00	2.00	336.00	\$43.04	\$14,461.44
§ 93.404(d)(1)	Project completion inspection	168.00	1.00	168.00	2.00	336.00	\$43.04	\$14,461.44
§ 93.404(d)(2)(i)	Onsite inspection upon completion	560.00	1.00	560.00	2.00	1120.00	\$43.04	\$48,204.80
§ 93.404(d)(2)(ii)	Ongoing Onsite inspections post completion	504.00	1.00	504.00	2.00	1008.00	\$43.04	\$43,384.32
§ 93.404(d)(2)(iv)	Project owner annual certification	168.00	1.00	168.00	2.00	336.00	\$43.04	\$14,461.44
§ 93.404(e)	Annual financial oversight of 10 or more units	168.00	1.00	168.00	2.00	336.00	\$43.04	\$14,461.44
§ 93.405	Uniform administrative requirements	56.00	1.00	56.00	4.00	224.00	\$43.04	\$9,640.96
§ 93.406 (a)	Annual CFR 200 audit	56.00	1.00	56.00	10.00	560.00	\$43.04	\$24,102.40

Regulatory Section	Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
§ 93.407 (a)(1)	Program recordkeeping	56.00	1.00	56.00	8.00	448.00	\$43.04	\$19,281.92
§ 93.407 (a)(2)	Project recordkeeping	560.00	1.00	560.00	2.00	1120.00	\$43.04	\$48,204.80
§ 93.407 (a)(3)	Financial recordkeeping	56.00	12.00	672.00	2.00	1344.00	\$43.04	\$57,845.76
§ 93.407 (a)(4)	Program administration records	56.00	12.00	672.00	8.00	5376.00	\$43.04	\$231,383.04
§ 93.407 (a)(5)	Records concerning other Federal requirements	56.00	1.00	56.00	10.00	560.00	\$43.04	\$24,102.40
§ 93.408	Performance reports	56.00	12.00	672.00	2.50	1680.00	\$43.04	\$72,307.20
§ 93.451	Annual performance reviews	56.00	1.00	56.00	8.00	448.00	\$43.04	\$19,281.92
	TOTAL	12,186.00		14,605.20		26,247.00		\$1,129,670.88
Total cost: 26,247.00 hours * \$43.04 (Hourly rate for GS12)								

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.

Regulatory Section	Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
§ 93.100(b)	Consolidated Plan and Action Plan Review	56.00	1.00	56.00	2.00	112.00	\$51.18	\$5,732.16
§93.401	HTF Grant Agreement	56.00	1.00	56.00	1.00	56.00	\$51.18	\$2,866.08
§ 93.408	IDIS Program Management Reports - Field Office	56.00	12.00	672.00	14.00	9408.00	\$51.18	\$481,501.44
§ 93.408	IDIS Program Management Reports - Headquarters	1.00	12.00	12.00	40.00	480.00	\$51.18	\$24,566.40
§ 93.451	Consolidated Annual Performance and Evaluation Report - Field Office	56.00	1.00	56.00	2.00	112.00	\$51.18	\$5,732.16
§ 93.451	Consolidated Annual Performance and Evaluation Report - Headquarters	56.00	1.00	56.00	1.00	56.00	\$51.18	\$2,866.08
	TOTAL	281.00		908.00		10,224.00		\$523,264.32
Total cost: 10,224.00 hours * \$51.18 (Hourly rate for GS13)								

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

Extension of a previously approved collection.

The SF-424 and -425 forms have been integrated into IDIS and are no longer required as a separate form. We have SF-1199A on the i83 form because it is a required for to have IDIS access, but it is not

program specific to HTF and is only done once when given IDIS access (which covers 5 different programs)

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.

HUD publishes each grantee's 5 Year Consolidated Plan, Annual Action Plan which includes the HTF Allocation Plan, and Consolidated Annual Performance and Evaluation Report on its website. Much of the data for this collection will be summarized and presented for review and planning purposes in these documents.

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

Not Applicable