

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS Jobs Plus Grant Competition and Program Administration (2577-0281)

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

This request is for a revision to the existing Jobs Plus information collection (2577-0281). The information collected is not expected to frequently change; therefore, HUD is seeking a regular three-year approval of the information collection. The information collection is required to administer the Jobs Plus grant program, which includes grant application and award, as well as grant and program administration. The funding and program authority for Jobs Plus is provided by the appropriations act for each FY, which most recently included the Further Consolidated Appropriations Act, 2020 (Public Law 116-94 enacted December 20, 2019) and the Consolidated Appropriations Act, 2021 (Public Law 116-260 enacted December 27, 2020) (i.e., the “Jobs Plus Program Authorization”). FY2014 was the first FY for which funds were appropriated and awarded. Jobs Plus grants are governed by each FY’s Notice of Funding Availability (NOFA) (future-going to be called, Notices of Funding Opportunity (NOFO)) and the Grant Agreements executed between each grant recipient and HUD.

The governing program authorizations (i.e., the appropriations acts) require that the grants be competitively awarded, which means information has to be collected from applicants in order to award the funds (this is done through the NOFO and competition process described below). Additionally, the program requires via the grant agreement that grantees provide information concerning program performance and administration (i.e., grantee reporting). Information must be collected (as provided in this information collection) in order to fulfill these requirements.

The appropriations acts also establish program purpose and eligibility requirements that must be followed. The Jobs Plus program develops locally-based, job-driven approaches that increase earnings and advance employment outcomes through work readiness, employer linkages, job placement, educational advancement, technology skills, and financial literacy for residents of public housing. The place-based program addresses poverty among public housing residents by incentivizing and enabling employment through earned income disregards for working residents and a set of services designed to support work including employer linkages, job placement and counseling, educational advancement, and financial counseling. Ideally, these incentives will saturate the target public housing developments, building a culture of work and making working residents the norm. Eligible applicants are public housing authorities (PHAs) and applications must target an eligible public housing project(s). Grantees are expected to develop key partnerships connect participants with needed services to remove barriers to work. Statute requires grantees to partner with the local Workforce Development Boards/American Job Center (formerly known as One-Stop Center) in their area to offer multiple employment-related services for residents with a range of employment needs.

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 is a revision to an existing collection. Eligible applicants interested in obtaining Jobs Plus grant funds are required to submit applications to HUD, as explained in the NOFOs. The information collection covers the information needed from applicants to determine which applicants should be funded. The information provided includes demonstration of the applicant’s need, past

experience/capacity, plans to implement the grant requirements, and partner support commitments. The application includes such information as narrative exhibits, partner commitment documents, budget, and map. The information will be used by HUD staff to evaluate threshold requirements and rate and rank grant applications. Applicants that receive grant funds are required to report to HUD on their progress, enabling HUD to manage and monitor the programs. The information collection also covers the data needed to fulfill this reporting requirement, and information needed for program management. HUD reviews the information submitted by applicants/grantees and uses it to award funds and, for grantees, to manage the program.

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 applicants, unless granted a waiver, must submit grant applications electronically to HUD via the www.grants.gov website (a government requirement since FY2005). This automation helps improve data quality and reduces burden to applicants/grantees by avoiding manual preparation and submission. Reporting is also done electronically.

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.*** There is no duplication of effort. Information collected is unique to each type of collection and does not duplicate any similar information or method

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.*** These information collections have no impact on small businesses or other small entities (small businesses are not eligible applicants). However, in general efforts have been made to minimize the burden placed on all applicants, while at the same time ensuring that sufficient information is provided for program purposes.

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 Federal statutory mandate to award funds competitively would not be met if the collection is not conducted. The information collection is necessary so that the available funds, per the appropriations act, may be awarded to successful applicants for Jobs Plus grants and then managed appropriately.

7. ***Explain any special circumstances that require the collection to be conducted in a manner: ...*** The following responses address special circumstances that would cause these information collections to be conducted 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. ***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...***
Updated information to be provided: [HUD published a Notice of Proposed Information Collection for Public Comments in the *Federal Register*, Volume 87; No. 475, Page 13747, on March 10, 2022. HUD received no comments on this proposed collection.
9. ***Explain any decision to provide any payment or gift to respondents, other than reenumeration of contractors or grantees.***
No payments or gifts are provided to respondents for any of these information collections.
10. ***Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.***
Assurance of confidentiality is neither provided nor needed for any of these information collections.
11. ***Provide additional justification for any questions of a sensitive nature.***
No sensitive questions are being asked for any of these information collections.
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.***
Costs to the respondents to complete these information collections will not exceed those needed for regular grant administration, planning and management. The following chart outlines the burden to respondents associated with the various aspects of the Jobs Plus grant program and a breakout of the forms associated with each portion of that burden. For Jobs Plus the burden hours per response total to 64.5 for applications. Jobs Plus information collections unrelated to the NOFA, including grantee reporting and program management, total to 31. Standard forms such as the SF 424 are not duplicative information and their burden amounts are not included. These forms are authorized under different OMB Control Numbers but are submitted as part of the Jobs Plus applications.

Information Collection	Number of Respondents Annually	Responses Annually (Frequency)	Total Responses Annually	Burden Hours per Response	Total Burden Hours Annually	Hourly Cost (Salary)	Total Burden Cost Annually
NOFO/Application Collection							
SF-424 Application for Federal Assistance (2501-0017)							
HUD-2880 Applicant Disclosure (2510-0011)	55	1	55	0.25	13.75	\$45.99	\$632.36
Certification Regarding Lobbying SF-LLL- Lobbying (0348-0046)	55	1	55	0.25	13.75	\$45.99	\$632.36
HUD-2991 Certification of Consistency with Consolidated Plan (2506-0112)	55	1	55	0.25	13.75	\$45.99	\$632.36
SF 424B Assurances - Non-construction programs							
Map	55	1	55	1	55	\$45.99	\$2,529.45
MOU between PHA and WDB	55	1	55	2	110	\$45.99	\$5,058.90
Match/Leverage Commitment Letters	55	1	55	14	770	\$45.99	\$35,412.30
Schedule	55	1	55	2	110	\$45.99	\$5,058.90
Organizational chart	55	1	55	1	55	\$45.99	\$2,529.45
Executive, summary documentation	55	1	55	3	165	\$45.99	\$7,588.35
Rating Factor 1 – Capacity	55	1	55	10	550	\$45.99	\$25,294.50
Rating Factor 2 – Need	55	1	55	8	440	\$45.99	\$20,235.60
Rating Factor 3 – Soundness of Approach	55	1	55	12	660	\$45.99	\$30,353.40
Detailed Program Budget	55	1	55	3	165	\$45.99	\$7,588.35
Summary Jobs Plus Budget (Form HUD-50144)	55	1	55	2	110	\$45.99	\$5,058.90
Narrative to Program Budget	55	1	55	4	220	\$45.99	\$10,117.80
Rating Factor 4 – Match/Leverage table	55	1	55	1	55	\$45.99	\$2,529.45
Rating Factor 5 – Preference Points Documentation (HUD-50153 or other)	55	1	55	0.75	41.25	\$45.99	\$1,897.09
<i>Sub-Total NOFO/Application Collection</i>			<i>55</i>	<i>64.5</i>	<i>3547.5</i>		<i>\$163,149.53</i>
Non-NOFO/Application Collections							
Code of Conduct (if not on HUD website, if recently updated, if not previously submitted)	8	1	8	1	8	\$45.99	\$367.92
Quarterly reporting	48	4	192	10	1920	\$45.99	\$88,300.80
Annual reporting	48	1	48	8	384	\$45.99	\$17,660.16
Workplan	48	1	48	10	480	\$45.99	\$22,075.20
Budget (HUD-50144)	48	1	48	2	96	\$45.99	\$4,415.04
Federal Financial Report (Form SF-425)							
<i>Sub-Total – Non-NOFO/Application Collection</i>			<i>344</i>	<i>31</i>	<i>2888</i>		<i>\$132,819.12</i>

Grand Totals	103	399	95.5	6435.5	\$295,968.6	5
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13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

See table in Item 12 for total annual cost burden. There are no start-up or additional costs to the respondents other than those reported in Item 12. A median wage for a Project Director was used for these collections, at \$45.99 (using the 2022 General Schedule, GS-14, step 1).

14. Provide estimates of annualized cost to the Federal Government.

The primary costs to the Federal Government involve the review of applications, making of awards, and monitoring of grants. This work is done by HUD staff. For the information collection items, the estimated total cost to the Federal government is provided in the table below.

<i>Position/information collection</i>	<i>Grade</i>	<i># of staff</i>	<i>FTE/Staff hours per Year</i>	<i>Hourly Rate</i>	<i>Annualized Cost</i>
<i>Application Reviews</i>					
Executive/Director	15	2	56	54.09	\$6,058.08
Program manager	14	2	100	45.99	\$9,198.00
Administrator/team leader	14	1	360	45.99	\$16,556.40
Application reviewers, chairs	13	14	80	38.92	\$43,590.40
			596		\$75,402.88
<i>Grants Management</i>					
Grant managers-quarterly reporting	14	10	16	45.99	\$7,358.40
Grant managers-annual reporting	14	10	4	45.99	\$1,839.60
Grant managers-work plan	14	10	28	45.99	\$12,877.20
Grant managers-budget	14	10	4	45.99	\$1,839.60
Grant managers-425	14	10	4	45.99	\$1,839.60
			56		\$25,754.40
Totals			652		\$101,157.28

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

The annual cost to respondents decreased by \$8,655.73 (\$310,937-\$302,280.77). The total number of hours requested decreased by 830.505 hours (7,403.25-6,572.75), reflecting an 11 percent decrease from the previously approved PRA.

Program Changes: N/A

Adjustments:

- Organized the table in Item 12 into two categories NOFO/Application Collections (information needed to apply for and award funding) and Non-NOFO/Application Collections (information needed for program/grant management).
- The salary amounts were increased to reflect the 2022 general schedule pay table.
- The number of applications was reduced from 75 to 55 (the program has received fewer applications in recent years). The number of grantees was increased from 36 to 48 to reflect changes in number of active grants.

- Reduced number of respondents for the Code of Conduct from 36 to 8 as it is rare that grantees need to submit this information and it is only needed at the time of grant funding.
- The following forms were removed as they are no longer used: HUD-2993 Acknowledgement of Application Receipt (2577-0259) and Final Financial Status Report (Form SF-269-A).
- Burden hours were added to the following forms (.25 hour for each form). These are standard forms all HUD programs use (not specific to Jobs Plus) but burden hours had not been included: SF-424 Application for Federal Assistance (2501-0017); HUD-2880 Applicant Disclosure (2510-0011); SF-LLL- Lobbying (0348-0046); Certification Regarding Lobbying (new to NOFOs, required by HUD); SF424B (new to NOFOs, required by HUD).
- Adjusted some burden hours per response to
- Added the following as new parts of the NOFO: Schedule, organizational chart and Executive summary documentation.
- Added Budget (HUD-50144) for clarity to Non-NOFO section (it used annually for budget updates).

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.*

The results of this collection of information will not be published for statistical use.

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.*

No approval is sought to not display the expiration date for OMB approval of the information collection.

18. *Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.*

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

B. *Collection of Information Employing Statistical Methods*

This information will not be collected using statistical methods.