Supporting Statement for Paperwork Reduction Act Submissions

**Information Collection:**

**Promise Zone Certification Form 50153**

**OMB Number 2501-0033**

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**.

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 [*promisezone@hud.gov*](mailto:promisezone@hud.gov)*.*

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. §§ 3531-32[[1]](#footnote-3), 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.

1. **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 collection is a reinstatement with change in which federal agencies will collect information for preference points, where available, in competitive federal grants and technical assistance applications.

Form 50153 is used by federal agencies to document that an application or proposal should receive preference points or priority consideration for certain competitive federal programs and technical assistance. The Certification Form is submitted by organizations applying for federal assistance with the rest of their proposal package, typically through the Grants.gov application portal.  The form is intended for any Federal NOFO that offers preference points to Promise Zone designees.  The burden calculation applies only when Promise Zone designees apply to NOFOs offering Preference Points

An authorized [signatory](https://www.hudexchange.info/programs/promise-zones/designee-contact-information/#urban-designees-contact-information) within the Promise Zone lead agency signs the form to certify that the grant proposal will advance the work of the Promise Zone towards its goals. The goal of the form is to prevent organizations who are not involved with their local Promise Zone from benefitting from preference points/priority consideration that are not meant for them.

The revisions to the form include the addition of a Paperwork Reduction Act burden statement; the addition of drop-down options to two of the information fields in the form, which will result in less typing for the applicant and fewer typos; the addition of HUD’s agency name to the top of the form; and the addition of descriptions to interactive fields to ensure 508 compliance.

1. **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 response has been streamlined for respondents and the receiving agency by adding drop down menus to two fields of information in the form. This will reduce time for the respondent by offering a list of options and, by eliminating variation in responses, save time for the agency employee receiving the form.

1. **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.

1. **Impact on Small Business and Small Entities**:

These information collections have no impact on small businesses or other entities.

1. **Consequence of Less Frequent Collection:**

There is no set frequency of submissions for this form. It is only submitted when a designated community is applying for a federal grant/program with preference points/priority consideration for Promise Zones. The designated communities will benefit from the frequency because the form is only submitted when the designated community decides to submit it.

1. **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**

1. **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,* on [05/23/2022](https://www.federalregister.gov/documents/2022/05/17/2022-10522/60-day-notice-of-proposed-information-collection-promise-zones-preference-point-certification-form) at 87 FR 31258 .

1. **Payment/Gifts to Respondents:**

No payments or gifts are provided to respondents for any of these information collections.

1. **Assurances of Confidentiality:**

The information requested under this collection is protected and held private in accordance with 5 U.S.C.552 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act of 1974).

1. **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 form, Certification of Consistency with Promise Zone Goals and Implementation. For Promise Zones, the burden hours per response total 6 minutes. The total burden hours are estimated at 8.4 hours. The total annual cost is $303.50, based on the hourly wage of Social and Community Service Managers - $36.13 per hour.[[2]](#footnote-4)**

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Information Collection | Number of Respondents | Frequency of Response | Responses  Per Annum | Burden Hour Per Response | Annual Burden Hours | Hourly Cost Per Response | Annual Cost |
| Certification of Consistency Form HUD – 50153 | 14 | 6 | 84 | 0.1 | 8.4 | $36.13 | $303.50 |
| Total |  |  |  |  |  |  | $303.50 |

1. **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 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.

1. **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.**

Review of information collected using this instrument will require 6 minutes of the federal agency receiving the form for the 84 submitted grant and technical assistance applications, typically at a GS-13[[3]](#footnote-5) step 1 level ($51.18 per hour). This level of effort is estimated to cost an average of $429.91 annually.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Information Collection | Number of Respondents | Frequency of Response | Responses  Per Annum | Burden Hour Per Response | Annual Burden Hours | Hourly Cost Per Response | Annual Cost |
| Certification of Consistency Form HUD – 50153 | 14 | 6 | 84 | .01 | 8.4 | $51.18 | $429.91 |
| Total |  |  |  |  |  |  | $429.91 |

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

2022 OPM federal wage adjustments have been made. Also, there are fewer federal grants and programs that offer preference points/priority consideration to Promise Zones than there were in 2018, so there will be fewer 50153 forms completed and submitted.

There are two minor revisions to the form, but no additional information is being requested of the respondents. Drop down menus have been added to two fields of information in the form. This will reduce the respondent’s burden and will streamline the responses for the receiving agency, as there will be no variation in spelling among the forms submitted. Rather than typing out the response in the field, the respondent can select from a list of options.

1. **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.**

Guidance has been issued to the 14 Promise Zone lead organizations and posted to a public website (<https://www.hudexchange.info/resource/4396/promise-zones-certification-form-and-guidance/>). The collection will take place over the course of the Promise Zone 10-year designation.

1. **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.

1. **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.

1. Attachment 1 – [US Code Title 42 Chapter 44 Sec.3531](https://www.govinfo.gov/content/pkg/USCODE-2010-title42/pdf/USCODE-2010-title42-chap44-sec3531.pdf) [↑](#footnote-ref-3)
2. <https://www.bls.gov/oes/current/oes_nat.htm#11-0000> [↑](#footnote-ref-4)
3. <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB.pdf> [↑](#footnote-ref-5)