

## Supporting Statement for Paperwork Reduction Act Submissions

**Title: Housing Counseling Training Program**

**OMB Control Number: 2502-0567**

**Forms: SF-424; HUD-92910; HUD-2880; SF-425**

### 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 collection of the information is necessary to allow the Office of Housing Counseling to review, rate and rank applications received under the Housing Counseling Training Grant Program Notice of Funding Opportunity. The collection assures that the data and information received is consistent among all applicants.

The Housing Counseling Training Grant program provides training for housing counselors on a nationwide basis. The training offered under this program supports the goal of having a strong and knowledgeable network of housing counselors. Eligible applicants are 501(c)(3) organizations and governmental agencies with experience in providing housing counseling training on a national basis.

The Office of Housing Counseling is responsible for administering the Department's Housing Counseling Program, and its Housing Counseling Training Grant Program. HUD's Housing Counseling Program is authorized by Section 106 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701x) and Section 4(g) of the Department of Housing and Urban Development Act of 1965 (42 U.S.C. 3533(g)) as amended. The Housing Counseling implementing regulations are found at 24 CFR part 214. Additional guidance is provided in the HUD Handbook 7610.1, REV-5.

**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.**

To improve the quality and standardize the counseling that HUD approved counseling agencies provide, HUD implemented a Housing Counseling Training Grant Program in 2006. The Housing Counseling Training Grant Program Notice of Funding Opportunity (NOFO) requests applicants to respond to 5 rating factors with narrative responses, form (HUD-92910) and supporting documentation. These responses will be used by HUD's Office of Housing Counseling to evaluate and rank applications submitted through Grants.gov. These Rating Factors will be used to evaluate applications. The maximum score is 100 for all applicants. HUD may rely on other information, such as performance reports, financial status information, monitoring reports, audit reports and other information available to HUD in making score determinations under any Rating Factor. The form HUD-92910 (charts) and narratives in 2 this collection allows HUD to evaluate and select the most qualified applicant(s). In addition to HUD-92910, applicants must submit forms SF-424 and HUD-

2880 with their applications. After grant awards, grantees must submit SF-425 as required by the Cooperative agreement.

Applicants must be a public or private non-profit organization and must submit evidence of “tax exempt” status under section 501(a) pursuant to section 501(c)(3) of the Internal Revenue Code (26 USC 501(a) and (c)(3)). Applicants may also be Tribal entities, State Housing Finance Agencies (SHFA), or units of local, county or state government. Applicants must have at least two years of experience providing housing counseling training services nationwide to housing counselors employed by housing counseling agencies participating in HUD’s Housing Counseling Program. Applicants are not required to be HUD Approved Housing Counseling Agencies.

This is a *Two-Year NOFA: One Competition Distributes Subsequent Year Funding if Available*. HUD used the grant applications received for FY 2021 and the corresponding scores and funding methodology to make awards for FY 2022, subject to the availability of appropriations. HUD contacted eligible FY 2021 grantees to determine their interest in FY 2022 funds if available.

The FY2022 Notice of Funding Opportunity (NOFO) for the Housing Counseling Training Grant Program competed \$2.75 million for a twelve-month period of performance. Six national housing counseling agencies were awarded funds to provide training on a national basis for a 4-quarter period of performance starting 10/1/2022.

The collection of post award data during the grant management period is done electronically and the information is used to assure compliance with the grant agreement. The grantees are required to submit quarterly Training Grant Reports on their performance under the grant.

There were no changes to the 5 rating factors. No changes were made to the HUD-92910.

**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.**

Unless otherwise directed, applications in response to the FY 2021 and FY2022 Training NOFO are submitted electronically through grants.gov. Electronic submission eliminates the burden on applicants to print, organize, and ship multiple copies of their applications. Additionally, Grants.gov auto-populates common elements of many forms, so that standard information about the applicant that appears on several forms only needs to be entered once. The Application Package contains the Adobe forms created by Grants.gov. The Instruction Download contains official copies of the NOFO and forms necessary for a complete application. The Instruction Download may include Microsoft Word, Microsoft Excel, and additional documents. Documents such as letters of support, letters of matching funds, Memorandum of Understanding from proposed partners may be downloaded to grants.gov.

**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.**

The Housing Counseling Training Grant Program is distinct from the Comprehensive Housing Counseling Program which requires some similar forms for its applicants. However, this data collection is not duplicative.

**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.**

The information collected does not impact small businesses or 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 collection is needed to ensure that applicants meet particular eligibility criteria and possess the capability to deliver effective and efficient services. If the data are not collected, OHC would not be able to adequately analyze the grant applications to determine funding. The collection must be done when there is a published NOFO for the housing counseling training grants which is usually done on a yearly basis. Also, the collection is needed for monitoring grant management. The grantees are required to submit quarterly reports on their activities which are tied to the collection.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner: (PLEASE ANSWER EACH BULLET SEPARATELY)**

\* requiring respondents to report information to the agency more often than quarterly;  
Not applicable. There is no such requirement.

\* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;  
Not applicable. There is no such requirement.

\* requiring respondents to submit more than an original and two copies of any document;  
Not applicable. There is no such requirement.

\* requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;  
Not applicable. There is no such requirement.

\* 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. There is no such requirement.

\* requiring the use of a statistical data classification that has not been reviewed and approved

by OMB;

Not applicable. There is no such requirement.

\* 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;

Not applicable. There is no such requirement. Or

\* 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. There is no such requirement.

**8. If applicable, provide a copy and identify the date and page number of publications 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.**

In accordance with 5 CFR 1320.8(d), a 60-day Federal Register Notice soliciting public comments was announced in the Federal Register on March 1, 2023, Volume 88, Page 16457. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on October 17, 2023, Volume 88, Page 71592. No comments were received.

Information was gathered from the following national housing counseling training grantees on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and cost and hour burden. The grantees are contacted at least quarterly through grant reports and emails and phone calls from the OHC staff. The questions and concerns of the grantees may result in some changes to the data collection.

Neighborhood Reinvestment Corporation  
1325 G St., NW Suite 800  
Washington, DC 20005-3104

UnidosUS

1126 16th St., NW  
Washington, DC 20036-4804

National Community Reinvestment Coalition  
727 15th St., NW, Suite 900  
Washington, DC 20005-6027

Rural Community Assistance Corporation  
3120 Freeboard Drive  
West Sacramento, CA 95691-5039

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

There are no payments to respondents, other than funds awarded to selected grantees to under the Housing Counseling Training Grant NOFO.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

HUD is taking the standard precautions regarding the electronic transfer of sensitive information such as client level data, including firewall protection, encryptions, and access security.

**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.**

There are no questions of a sensitive nature.

**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 for approval 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.

\* 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.

Information Collection / Affected Public	Form Name / Form Number Collection Tool	Number of Respondents	Frequency of Response	Responses Per Year	Average Burden Hours Per Response	Annual Burden Hours	Hourly Cost per Response (Hourly Wage Rate)	Total Annual Respondent Cost
Not-for-profit institutions	On-time Submission – Application							
	SF-424	10	1	10	1	10	\$91.05	\$911
	HUD-2880 (2510-0011)	10	1	10	2	10	\$91.05	\$1,821
	NOFO Rating Factors 1-5 HUD 92910 and narratives	10	1	10	102	1,020	\$91.05	\$92,871
	Post Award Submission SF 425 and other documents required by Cooperative Agreement	6	1	6	12	72	\$91.05	\$6,555
	<b>TOTAL FOR APPLICATION PROCESS</b>	<b>36</b>		<b>36</b>		<b>1,122</b>		<b>\$102,158</b>
	Grant Management – quarterly reports	6	4	24	25	600	\$91.05	\$54,630
	<b>TOTAL FOR GRANT MANAGEMENT</b>	<b>6</b>		<b>24</b>		<b>600</b>		<b>\$54,630</b>
<b>GRAND TOTALS</b>		<b>42</b>		<b>60</b>		<b>1,722</b>		<b>\$156,788</b>

Note: The "Avg. Hourly Wage Rate" for each respondent includes a 1.46 multiplier to reflect a fully-loaded wage rate.

"Type of Respondent" should be entered exactly as chosen in Question 3 of the OMB Form 83-I

According to the U.S. Department of Labor, Bureau of Labor Statistics website ([https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm)) the wage rate category for 11-9199 Managers, All Other is estimated to be \$91.05 (\$62.36 x 1.46) per hour, therefore, the estimated burden hour cost to respondents Manager-Other is estimated to be \$156,788.

**13. Provide an estimate for 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 and 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 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 record keeping, capital, start-up or maintenance costs associated with this information collection.

**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.**

### Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs:	0
Staff Salaries*  <b>One-time submission/ Review of applications:</b> Of the 10 responses, 5 teams of 2 OHC staff will review 2 responses each. The hours per response are 21. The total number of hours will be 210. Using (GS 13-10) \$52.66 plus 1.46 multiplier for \$76.88 the total cost is <b>\$16,144.80</b> .  <b>On-going/ grant management:</b> 6 grantees will submit 4 quarterly reports which will be reviewed by 6 OHC staff. This is a total of 24 responses for 4 hours each for a total of 96 hours. Using (GS 13-10) hourly rate of \$52.66 plus 1.46 multiplier for \$76.88, the total cost is <b>\$7,372.80</b> .	\$23,517.60
Facilities [cost for renting, overhead, etc. for data collection activity]	0
Computer Hardware and Software [cost of equipment annual lifecycle]	0
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	0
Travel	0
Printing [number of data collection instruments annually]	0
Postage [annual number of data collection instruments x postage]	0
Other	0
<b>Total</b>	<b>\$23,517.60</b>

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

This is a renewal of a currently approved collection. There are no changes to information being collected or how it is being collected. There is an increase in burden hours as there is an increased number of applicants and grantees. In addition to HUD-92910, applicants must submit forms SF-424 and HUD-2880 with their applications. After grant awards, grantees must submit SF-425 as required by the Cooperative agreement. The burden for SF-425 is included in the burden for “Post Award Submission”.

The estimates are based on actual Housing Counseling Training Grant Program awardee experience with the Training Grant NOFO. These charts do not affect how the housing counseling program is being administered. The NOFO requires the HUD-92910, SF-424 and HUD 2880. The Grant Cooperative Agreement requires the SF-425.

**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.**



After the grant awards, HUD will publish the information on the selected grantee(s), including the name of the organization, the address, organization mission, and grant amount on HUD Exchange <https://www.hudexchange.info/programs/housingcounseling/>. A press release and GovDelivery messages are also published.

**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.**

HUD will display the expiration date for OMB approval of this 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.**

HUD does not request an exception to the certification of this information collection.

**B. Collections of Information Employing Statistical Methods**

There is no statistical methodology involved in this collection.