

Supporting Statement for Paperwork Reduction Act Submissions
OMB # 2577-0259 Title of Collection Family Unification Program

A. Justification

1. Why is this 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/authorizing the collection of information.

The reinstatement of this previously approved collection without change for which approval has expired is required in order to withdraw this PRA. The information collection required for the Family Unification Program is now covered under another PRA OMB #: 2577-0169. The information that follows is copied directly from the prior 83i Supporting Statement when OMB # 2577-0259 went through PIH and Departmental clearance in 2015.

Congress periodically appropriates funds to the Department of Housing and Urban Development to competitively fund new vouchers to be used to promote the unification of families for whom the lack of adequate housing is a primary factor in the imminent placement of a family's child, or children, in out-of-home care; or the delay in the discharge of the child, or children, to the family from out-of-home care. Youths at least 18 years old and not more than 21 years old (have not reached their 22nd birthday) who left foster care at age 16 or older and who do not have adequate housing are also eligible to receive housing assistance under FUP. This PRA covers applications for these funds, including the selection criteria for awarding FUP vouchers and specific requirements that will apply to selected applicants.

The Family Unification Program will employ a comprehensive approach to assisting at-risk families centered on providing adequate housing and supportive services in partnership between Public Housing Agencies (PHAs) and Public Child Welfare Agencies (PCWAs). The program aims to unify families for whom the lack of adequate housing threatens to place children in out-of-home care or delays the discharge of children to the family from out-of-home care by providing Housing Choice Vouchers to allow families to obtain adequate housing in the neighborhoods of their choice.

Eligible applicants interested in obtaining FUP funds will be required to submit applications to HUD, as explained in the FUP NOFA. The information collection covers the information needed from applicants to determine which applicants should be funded and program reporting and recordkeeping requirements. The information provided demonstrates the applicant plans to implement the program requirements and includes related applicant history. The application will include such information as an MOU between the PHA and PCWA, narrative statements related to the program rating criteria, and other statements ensuring that the applicants meet HUD requirements. The information will be used by HUD staff to evaluate threshold requirements, rate and rank FUP voucher applications, and measure performance.

2. How is the information collected and how is the information to be used?

This is a reinstatement to discontinue the collection. After the award of FUP vouchers, PHAs were expected comply with reporting requirements for the HCV program, covered in OMB #: 2577-0169. The information collection required for the Family Unification Program is now covered under another PRA OMB #: 2577-0169. PHAs are also expected to inform HUD, not more than annually, if their baseline of FUP vouchers has changed.

3. Describe whether, and to what extent, the collection of information is automated (item 13b1 of OMB form 83-i). If it's not automated, explain why not. Also describe any other efforts to reduce burden.

This information collection is automated in order to improve data quality and to reduce the public reporting burden. Since FY 2005, the Department has required applications prepared in response to NOFAs to be submitted electronically via Grants.gov. Submission of baseline adjustments may be done via electronic mail.

4. Is this information collected elsewhere? If so, why cannot any similar information already available be used or modified.

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. Does the collection of information impact 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 significant impact on small businesses or other 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 reinstatement of this previously approved collection, without change, for which approval has expired is required in order to withdraw this PRA. The information collection required for the Family Unification Program is now covered under another PRA OMB #: 2577-0169.

7. 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;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- 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
- 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.

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. 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.

This information collection was announced in the Federal Register, Volume 88; No. 103, Page 34512, on May 30, 2023. The public was given until July 31, 2023, to submit comments on the proposed information collection. HUD received no comments on this Proposed Information Collection.

9. Explain any payments or gifts to respondents, other than remuneration 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 assurance in statute, regulation or agency policy.

Assurance of confidentiality is neither provided nor needed for any of these information collections.

11. Justify any questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private

No sensitive questions are being asked for any of these information collections.

12. Estimate public burden: number of respondents, frequency of response, annual hour burden. Read the complete instructions on the form 83i. Explain how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices. Provide a table to describe the elements of the burden. Break out each form used.

The chart below outlines the burden hours associated with the various aspects of the Family Unification Program NOFA and includes the post-award submission of the Logic Model approved under another OMB approval to capture information associated with implementation of Area Wide Housing Opportunities sub-categories associated with HUD policy priorities.

Costs to the respondents to complete these information collections for the application process are indicated below.

Burden hours per application response are estimated at 18.02 hours and per post-award reporting and recordkeeping at 10.5 hours. Burden hours are estimated for 265 applicant respondents submitting NOFA applications and 42 applicants receiving funding and maintaining records and reporting on program implementation for a total burden of 6,101.95. Forms such as the SF 424 are not duplicative information. These forms, while authorized under different OMB Control Numbers, are submitted as part of the FUP application process and used specific to the applications' content.

Description of Information Collection	Number of Respondents	Frequency of Response	Responses per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost per Response	Annual Cost
SF424 (0348-0043) Application for Federal Assistance	265	Annual	1	0.75	198.75	\$35.03	\$6,962.21
SF LLL (0348-0046) Lobbying Form	10	Annual	1	0.17	1.7	\$35.03	\$59.55
HUD-96011 (2535-0118) 3 rd Party Documentation Facsimile Transmittal	265	Annual	1	0.1	26.5	\$35.03	\$928.30
HUD -2993 Acknowledgement of Application Receipt (2577-0259)	13	Annual	1	0	0	\$35.03	\$0.00
Logic Model-HUD-96010 (2535-0114)	265	Annual	1	0	0	\$35.03	\$0.00
PCWA Statement of Need (maximum of 5 pages)	265	Annual	1	2.25	596.25	\$35.03	\$20,886.64
Memorandum of Understanding between PHA and PCWA	265	Annual	1	6	1590	\$35.03	\$55,697.70
Rating Criteria 1: Area-Wide Housing Opportunities. Narratives (up to 20 pages). Logic Model (HUD-96010)	265	Annual	1	3	795	\$35.03	\$27,848.85
Rating Criteria 2: PCWA Commitments. Narratives (up to 10 pages). Other Documentation	265	Annual	1	1.25	331.25	\$35.03	\$11,603.69
Rating Criteria 3: Self- Sufficiency Programs. Narrative: (up to 6 pages) Documentation: Excerpt from Administrative Plan or policies manual for FSS program operations Certification: FUP recipients enrolled in FSS	265	Annual	1	0.5	132.5	\$35.03	\$4,641.48
Rating Criteria 4: Local Coordination Letter of Support	265	Annual	1	1	265	\$35.03	\$9,282.95
PCWA Contractor Documentation	265	Annual	1	1	265	\$35.03	\$9,282.95
HUD2990, Certification of Consistency with the RC/EZ/EC-IIs Strategic Plan	265	Annual	1	0	0	\$35.03	\$0.00
Funding Application HUD- 52515 (2577-0169). Includes leasing schedule	265	Annual	1	1	265	\$35.03	\$9,282.95
Affirmatively Furthering Fair Housing Statement (addendum)	265	Annual	1	1	265	\$35.03	\$9,282.95

Description of Information Collection	Number of Respondents	Frequency of Response	Responses per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost per Response	Annual Cost
HUD2880, Applicant/Recipient Disclosure/Update Report (2510-0011)	265	Annual	1	0	0	\$35.03	\$0.00
HUD2991, Certification of Consistency with the Consolidated Plan	265	Annual	1	0	0	\$35.03	\$0.00
Subtotal (Application)	265	Annual	1	18.02	4731.95	\$35.03	\$165,760.21
Family Report HUD-50058 (2577-0083)	242	Annual	75	.02	363	\$35.03	\$12,715.89
Baseline adjustment	10	Annual	1	.5	5	\$35.03	\$175.15
Program and Accounting Recordkeeping	242	Annual	1	5	1210	\$35.03	\$42,386.30
Subtotal (Reporting/Recordkeeping)				10.5	1,456.50	\$35.03	\$55,277.34
Total	265	Annual	1	028.52	6,188.45	\$35.03	\$221,037.55

The estimate of the total annual cost burden to respondents/recordkeepers resulting from the collection of this information is: 6,188.45 burden hours x \$35.03 = \$221,037.55; assuming a Manager's hourly rate at the GS-13/Step 1 level.

13. Estimate of the annual cost to respondents or recordkeepers (do not include the cost of hour burden shown in Items 12 and 14). Read the complete instructions on the form 83i. There are no start-up or additional costs to the respondents other than those reported in Item 12 above in the Burden Cost Column.
14. Estimate annualized costs to the Federal government.

	No. of Respondents	Hrs. per Response	Annual Hours	Cost Per Hour	Annual Cost to Federal Gov't
Receipt and processing of NOFA applications	265	16	4240	\$34.34*	\$145,601.6
Reviewing reports	42	8	336	\$34.34	\$11,538.24
Reviewing baselines	173	1	173	\$34.34	\$5940.82
Reviewing records	42	4	168	\$34.34	\$5,769.12
Total Cost					\$16,8849.78

*Represents GS-13/Step 1 Program Analyst or Housing Program Specialist hourly rate.

15. Explain any program changes or adjustments reported in items 13 and 14 of the OMB Form 83i.
This is a reinstatement without change of an expired PRA for the sole purpose of withdrawing the PRA. There are no changes on Form 83i.
16. If the information will be published, outline plans for tabulation and publication.
Information collection results will not be published.

17. Explain any request to not display the expiration date.

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

18. Explain each exception to the certification statement identified in item 19.

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.