

**Supporting Statement for Paperwork Reduction Act Submissions**  
**Resident Opportunities and Self Sufficiency (ROSS) program**  
**OMB No: 2577-0229**

**A. Justification**

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.

1. Section 538 of the Public Housing Reform Act (Pub. L. 105-276, 112 Stat. 2461, approved October 21, 1998) added a new section 34 to the U.S. Housing Act of 1937 which provides a mandate to link supportive services to help public housing residents achieve economic self-sufficiency. The Resident Opportunities and Self-Sufficiency (ROSS) Program responds to this requirement by providing funding to Public Housing Authorities, Tribes/Tribally Designated Housing Entities, resident organizations, Multifamily Owners, and qualified nonprofit organizations to provide supportive services or service coordination to residents of Public and Indian housing.

All applicants to the ROSS program must: have in place a firmly committed match contribution equivalent to 25 percent of the total grant amount requested; provide the sources of their match; indicate their expected outputs and outcomes; provide salary comparability information; and indicate the number of units they will serve. The ROSS forms help the Department capture this information and evaluate applicants so that HUD can determine if applicants will meet these and other programmatic requirements.

The Department is submitting this PRA for revision of a currently approved collection.

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.**

The information provided to HUD by the eligible applicants will be reviewed and evaluated by HUD. Using a rating and ranking system for qualified candidates, HUD will determine which organizations should receive awards under the ROSS program. The forms will collect information such as the number of Service Coordinators needed, the number of units to be served, the budget for each Service Coordinator, salary comparability information, the total match contribution, and the projected services and outcomes for each grantee.

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](http://www.grants.gov) web site. This does not necessarily reduce the reporting burden as the information required for submission is the same as that required when paper applications were submitted. Since the forms are electronic, this may also allow for responses to be prepopulated from one form to the other where applicable which may be less burdensome when applicants are completing forms.

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 information. HUD standard forms used in conjunction with the application process do not ask questions that are specific enough for the program area to evaluate applicants' eligibility, applicants' full capacity, organizational composition, viability of their proposal, and experience of relevant staff. For this reason, forms specific to the ROSS program have been developed. Without the information

Signature of Senior Officer or Designee:

Date:

X  
Colette Pollard, Departmental Reports Management Officer  
Office of Chief Information Officer

gathered in these forms, the Department would not be able to fully evaluate applicants' capacity to run an effective program and administer federal funds.

**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 being collected has no significant impact on small businesses or other small entities. All eligible applicants will submit the same forms, certifications, and assurances.

**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.**

ROSS-specific forms (HUD-52752, HUD-52753, HUD-52755, HUD-52768) are collected on a one-time basis. Less frequent collection is not possible as applicants apply for funding only once a year. This information must be collected to allow HUD to determine qualification for grant funding. Not collecting this information would make it impossible to assess which organizations should receive funding and the funding amount. These forms allow HUD to get a complete picture of each applicant and are a vital tool the Department uses to ensure that funding is awarded as fairly as possible.

Program-Specific Forms	Required For:
HUD-52752 (Cert. with Indian Hsng. Plan)	Tribes/TDHEs for ROSS
HUD-52753 (Cert. Resid. Board Election)	Resident Associations and Non-Profits supported by RAs for ROSS
HUD-52755 (Sample Contract Admin. Partnership Agreement)	All Resident Associations and Troubled PHAs for ROSS
HUD-52768 – ROSS SC Application Form	All ROSS SC Applicants

**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;
- 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 of 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 require the collection to be conducted in a manner which is inconsistent with the guidelines in 5 CFR 1320.

**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.

HUD published a Notice of Proposed Information Collection for public comments in the Federal Register, Volume 88; No. 68, page 21204 on April 10, 2023. The public has until June 9, 2023, to submit comments on the proposed information collection. There were no public comments received.

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

No payment or gift will be provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy. No assurance of confidentiality provided. The HUD Reform Act includes specific requirements for the government to make all information regarding applications for HUD assistance available for public inspection, after awardees have been determined and awards made.
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.  
The forms in this collection do not ask questions of a sensitive nature. This includes the Applicant/Recipient Disclosure/ Update Report (HUD 2880).
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.

We estimate the information collection requirements of the ROSS NOFO will have the following reporting burden (please see chart below):

Description of Information Collection	Number of Respondents	Responses per Year	Total Annual Responses	Hrs per Response	Total Hours
HUD-52752 (Cert. with Indian Hsng. Plan)	50	1	50	.17	8.5
HUD-52753 (Cert. Resid. Board Election)	100	1	100	.17	17
HUD-52755 (Sample Contract Admin. Partnership Agreement)	100	1	100	Sample (N/A)	N/A
HUD-52768 (ROSS SC Application Form)	350	1	350	3.30	1,155
SF-424	350	1	350	0	0
SF-424 Supplement Survey on Ensuring Equal Opportunity for Applicants	350	1	350	0	0
HUD-2880- Applicant Disclosure/ Update Report (2510-0011)	350	1	350	0	0
HUD-2991 – Certification of Consistency with Consolidated Plan	325	1	325	0	0
HUD-2994 - A You are Our Client (OMB no: 2535-0116)	350	1	350	0	0
SF-LLL-Disclosure of Lobbying Activities	40	1	40	0	0

Grant Agreement*	150	1	150	N/A	N/A
Annual Report (InForm Tool) (2501-0034)	150	1	150	0	0
Subtotal (Program Reporting/Recordkeeping)	150	1	150	0	0
<b>Total</b>	<b>350</b>	<b>1</b>	<b>350</b>	<b>Varies</b>	<b>1,180.5</b>

The burden hours were estimated by HUD staff who completed a package of forms. For the ROSS SC program, the burden would be approximately 3.37 hours per application, for a total of 1,180.5 hours.

\*The Grant Agreement is completed by HUD staff, signed by the recipient of the grant, and returned to HUD electronically. This form is a certification and HUD ascribes no burden to its use.

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 will be no additional costs to the respondents. Application preparation and submission are part of the regular operation of Housing Authorities, Tribes, nonprofits, Multifamily Owners, and resident organizations.

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.

There will be no additional costs to the Federal Government. HUD's Grants Management Center receives, processes, reviews and recommends approval/denial of applications for grant funding.

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

The HUD-52768 form was revised to collect necessary information from applicants serving residents in RAD PBV or RAD PBRA units so that HUD may determine eligibility and award amounts.

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.**

The OMB approval will be displayed in the grant announcement.

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 are no exceptions to the certification statement identified in item 19 of SF 83-i.

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

Not Applicable.

## **B. Collection of Information Employing Statistical Methods**

This information will not be collected using statistical methods.