

Supporting Statement for Paperwork Reduction Act Submissions

**The Green and Resilient Retrofit Program (GRRP)
Supporting Statement for Paperwork Reduction Act Submission
Office of Recapitalization, Office of Housing-Federal Housing Commissioner**

OMB Control No. 2502-0624

GRRP Applications: 1) Elements, 2) Leading Edge, and 3) Comprehensive

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 **Green and Resilient Retrofit Program (“GRRP”)** is newly funded through Title III of the Inflation Reduction Act of 2022, H.R. 5376 (IRA), in section 30002 titled “Improving Energy Efficiency or Water Efficiency or Climate Resilience of Affordable Housing” (the “IRA”), authorizing HUD to make loans, grants to improve energy or water efficiency; enhance indoor air quality or sustainability; implement the use of zero-emission electricity generation, low-emission building materials or processes, energy storage, or building electrification strategies; or address climate resilience of eligible HUD-assisted multifamily properties. The program leverages significant technological advancements in utility efficiency and adds a focus on preparing for climate hazards – both reducing residents’ and properties’ exposure to hazards and protecting life, livability, and property when disaster strikes. With its dual focus, GRRP is the first program to consider, at the national scale, how best to approach both green and energy efficiency upgrades simultaneously with investment in climate resilience strategies in multifamily housing. HUD is taking a multi-faceted approach to deploy these funds multiple funding rounds and for properties at different development stages.

Funding under this program will be made through multiple cohorts under one or multiple Notices of Funding Opportunity (NOFOs) that will detail the application process for eligible applicants. This collection is necessary in order to receive applications requesting funding under this program.

- 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 from the current collection.**

The GRRP applications will be used by owners of HUD-assisted multifamily properties to request funding under multiple GRRP NOFOs. Each application will be catered to meet the intended audience and the purpose of each NOFO as described below.

- **Elements Application.** The “Elements” NOFO provides modest funding to Owners to add proven and meaningful climate resilience and energy efficiency measures to the construction scopes of in-progress recapitalization transactions. Since these recapitalizations will lock in technologies for many years to come, GRRP funding will make it possible for Owners to substitute greener or more resilient building components or fixtures in their existing plans. Elements Awards are designed for properties already planning renovations so they can add green or resilient elements to existing scopes of work. Following selection pursuant to the terms of the Elements NOFO, HUD will issue a commitment letter to each Owner (see Attachment A of this Supporting Statement).

- **Leading Edge Application.** The “Leading Edge” NOFO provides funding for retrofit activities to achieve significant green certifications which also include climate resilience components. Provided during the early planning stages of a recapitalization effort, the Leading Edge Awards provide resources to complement an Owner’s existing financing strategy, allowing them to design the recapitalization to the highest standards of energy efficiency and climate resilience. Leading Edge Awards are designed for Owners aiming to quickly meet ambitious carbon reduction and resilience goals without requiring extensive collaboration with HUD. Following selection pursuant to the terms of the applicable Leading Edge NOFO, HUD will issue a preliminary commitment letter to each Owner (see Attachment B of this Supporting Statement).

- **Comprehensive Application.** The “Comprehensive” NOFO will provide funding to initiate recapitalization investments designed from inception around both proven and innovative measures, including ambitious greening, renewable energy generation, use of structural building materials with lower Embodied Carbon, and climate resilience investments. Comprehensive Awards target properties at the highest need for climate resilience and energy efficiency upgrades, which can be measured through multiple tools, including through initial utility consumption benchmarking, derived in part from tenant utility consumption data. The construction funded by a Comprehensive Award will be informed by a series of assessments that will identify the property’s specific capital needs as well as property-specific opportunities to meet GRRP objectives. Comprehensive Awards are designed for the widest range of properties, including those that have not yet developed a recapitalization plan. Following selection pursuant to the terms of the Comprehensive NOFO, HUD will issue a preliminary commitment letter to each Owner (see Attachment C of this Supporting Statement).

To support applicant selection, applicants will have the opportunity to perform initial utility consumption benchmarking to understand the property’s baseline performance. The data will be derived from property and tenant utility consumption data, which is included under this information collection, and HUD will receive a copy of the property-level data as explained in question number 3 of this Supporting Statement.

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.

The applications will be accessed and submitted through the grants.gov website. Applications will consist of Adobe or Microsoft Excel files to automate the completion of the form and standardize HUD’s review of the information. HUD-prepared application templates will be programmed to pre-load information already available to HUD as needed (e.g., Project information, Owner contact information, Unit inventory distribution) and to conduct mathematical computations as needed, minimizing the entries by applicants. In support of the application, HUD will also receive utility efficiency data accessed and submitted either through Portfolio Manager (portfoliomanager.energystar.gov) or the Multifamily Building Efficiency Screening Tool made available on the GRRP website. By leveraging these technological tools, we will reduce burden and only collect the minimally necessary information that serve the purpose of the application process.

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.

This program will target HUD-assisted multifamily properties of which the Department collects and maintains information for each, including owner information, building and unit information, and other data. The GRRP applications will utilize this information and only solicit information not already available to the Department, including the owner's interest in participation, data related to the current energy consumption of the property, information related to the owner's plans to finance improvements to the property, and other relevant information needed to confirm eligibility, rank, and select applicants, and determine the amount of awards.

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.

This information collection has no impact on small businesses or other 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.

Owners of HUD-assisted multifamily properties interested in participating in GRRP are required to submit applications to HUD. Failure to collect this information would impede upon the Department's ability to make funds available for owners to make green and resilient retrofits to their properties.

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 often than quarterly;**

None

*** Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

None

*** Requiring respondents to submit more than an original and two copies of any document;**

None

*** Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**

None

*** 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;**

None

*** Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

None

***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**

None

*** 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.**

None

- 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.**

In accordance with 5CFR 1320.8(d), this information collection soliciting public comments was announced in the *Federal Register* on **August 1, 2023**, Volume **88**, No. **146**, Pages **50166**. (0) Comments received.

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

No payment or gift will be granted to the respondents.

- 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 this information collection.

- 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.**

No sensitive information is being asked by this collection.

- 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 1.**

The number of respondents for the GRRP application forms are reflected in the chart below and indicates the number of potential applicants. Individual application forms must be submitted for each eligible HUD-assisted multifamily project owner interested in the program. HUD estimates that approximately 500 projects could apply for GRRP under one of the following: Immediate Impact Elements (targeted at HUD-assisted multifamily properties that are already in the process of planning for a recapitalization transaction); Next Generation (targeted at properties with Immediate Impact Elements and additional requirements); and Comprehensive (targeted at any HUD-assisted multifamily property with minimal requirements). . The “manager-other” median hourly wage at \$60 per hour was used for this collection, as listed in U.S. Bureau of Labor Statistic Occupational Employment and Wages.

Each application package is estimated to take approximately 15 hours to complete.

Forms	Number of Resp.	Frequency of Response	Resp. Per Year	Avg. Burden Hours Per Resp.	Annual Burden Hours	Hourly Cost per Response	Total Annual Cost
GRRP Elements Application (HUD Form 5993)	150	1	150	15	2,250	\$60	\$135,000
GRRP Leading Edge Application (HUD Form 5991)	30	1	30	15	450	\$60	\$27,000
GRRP Comprehensive Application (HUD Form 5992)	500	1	500	15	7,500	\$60	\$450,000
Total	680		680		10,200		\$612,000

13. 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).

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. 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.

The number of respondents for GRRP application forms reflected in the chart below indicates the amount of *expected* applicants. Individual application forms must be submitted for each HUD-assisted multifamily property for participation in GRRP. Provided below is an analysis of the costs for review and approval of the applications within this collection for purposes of transparency in the internal costs borne onto HUD. The cost was estimated based on the number of expected annual responses as described in Item 12. The government cost of the collection is exclusively borne by the staff time needed to review and act on (i.e., approve, reject, solicit additional information) each application submission.

Each form is estimated to take approximately three hours to review by a GS-12 Step 1 at an hourly salary of \$43.04. The expected cost to the federal government is therefore \$87,720. There are no additional costs expected for the processing of these applications or operational costs associated with this data collection.

Annual Cost to the Federal Government

Type of Reporting	Total Responses	Staff hours per response	Total Staff Hours	Salary (per hour)	Total Costs
GRRP Elements Application (HUD Form 5993)	150	3	450	\$43	\$19,350
GRRP Leading Edge Application (HUD Form 5991)	30	3	90	\$43	\$3,870
GRRP Comprehensive Application (HUD Form 5992)	500	3	1,500	\$43	\$64,500
Total	680		2,040		\$87,720

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 revision of a currently approved new collection.

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.

Information collection results will not be 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.

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, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement.

B. Collections of Information Deploying Statistical Methods

There are no collections of information that employ statistical methods.