

Supporting Statement for Paperwork Reduction Act Submission
HUD Research, Evaluation, and Demonstration Cooperative Agreements
OMB number: 2528-0299

Part 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 of each regulation mandating or authorizing the collection of information.**

This information collection request (ICR) is submitted as a revision of a currently approved collection (2528-0299). With this request, the Office of Policy Development and Research (PD&R) within the U.S. Department of Housing and Urban Development (HUD) intends to continue establishing cooperative agreements with qualified for-profit and nonprofit research organizations and universities to conduct research, demonstrations, and data analysis. HUD will issue a Notice of Funding Opportunity (NOFO) describing the cooperative research program and the criteria for applying for awards.

HUD's Office of Policy Development and Research is authorized to conduct housing and community development research through its authorizing legislation. The statutory authority for PD&R's research activities is found in Title V of the 1970 Housing Act, which authorizes programs of "research, studies, testing, and demonstrations relating to the missions and programs of the Department." This authority is codified in the [U.S. Code at 12 USC 1701z-1](#) and is attached as Appendix A.

As funding is available, the HUD Research, Evaluation, and Demonstration cooperative agreement program (HUDRD) will be established through the publication of individual NOFOs and will support research that advances the priority research questions outlined in HUD's Learning Agenda¹. HUDRD includes HUD's Research Partnerships program and HUD's Centers of Excellence initiative. The Learning Agenda draws on input and support from practitioners, advocates, people with lived experience in HUD programs, researchers, and policymakers at the federal, state, and local levels. Through the Department's extensive stakeholder engagement, the Learning Agenda articulates critical, policy-relevant research questions that will inform how HUD invests in evidence building over the next five years.

Successful applicants will carry out HUDRD research activities with PD&R's engagement. These activities will be of three main types: research and evaluation, program demonstrations, and data analysis and metrics. HUDRD will be used as a mechanism to undertake comprehensive evaluations and demonstrations to evaluate program performance and support carefully designed experiments and quasi-experimental studies to measure the impact of current and potential programs and policies.

¹ Access HUD's current Learning Agenda here: https://www.huduser.gov/portal/about/pdr_learningagenda.html

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.

This ICR covers the post-award materials that cooperative agreement recipients will be required to submit to HUD over the course of the period of performance of their awards. Pre-award materials submitted by applicants are not included in this ICR because they are covered under HUD's generic clearance (OMB Control Number 2501-0044).

- Quality Control Plan: a written document that outlines the awardees proposed approach to quality control of all research activities and written deliverables to be produced over the period of performance.
- Management & Work Plan: a written document that outlines the expected workflow for the project over the period of performance, providing a project timeline, the allocation of staff and other resources to each task, and a strategy to address any potential challenges to completing the project on time and within budget.
- Sustainability Plan: a deliverable required only of recipients of Centers of Excellence funding. This document describes the awardee's detailed plan for the establishment, sustainability, and ongoing financial stability of the Center of Excellence after the conclusion of the HUD/PD&R funding.
- Research Design-: a technical blueprint to the completion of funded research project, including key research question(s) to be addressed, a strategy for accessing/collecting the necessary data, proposed analytic methods, and an outline of proposed deliverables.
- Quarterly Progress Reports: a narrative summary of accomplishments of the awardee over the prior quarter, discussion of any deviations from the initial schedule of progress, and a summary of how those deviations impact the project and what the Grantee recommends for handling the deviation.
- Final Research Report: the culmination of the overall research effort supported by the cooperative agreement. The report must be of publication quality and thoroughly describe the research objectives, the methodology, and the findings.
- Final Narrative Report: provides the final breakdown of overall award spending over the course of the full period of performance.

HUD/PD&R uses these deliverables to monitor the progress of the research being carried out under the cooperative agreement and to monitor the use of the funding and authorize payments to the awardee.

- 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.**

Cooperative agreement recipients will submit all required deliverables to HUD/PD&R electronically via email to the Government Technical Representative's and Grant Management Specialist.

- 4. Describe efforts to identify duplication. Show specifically why similar information already available cannot be used or modified for use for the purposes described in Item 2. above.**

The items included in this ICR are required for HUD/PD&R to monitor the cooperative agreements funded under HUDRD. This information is not being collected elsewhere.

- 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.**

Cooperative agreement recipients may include public or private nonprofit organizations or intermediaries, including institutions of higher education and area-wide planning organizations; for profit organizations; States, units of general local government, or Indian tribes; and Public Housing Authorities. Although some of these organizations would be considered small businesses or entities, the post award information collection has been minimized to include only such documentation that HUD/PD&R requires to monitor the cooperative agreements.

The costs of finalizing the cooperative agreement and reporting are considered to be reimbursable expenses under the cooperative agreement.

- 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 items included in this ICR are required for HUD/PD&R to monitor the cooperative agreements funded under HUDRD. If this information is not collected, HUD will not be able to safeguard the effective expenditure of taxpayer funds or to ensure effective performance of cooperative agreements, nor will HUD be able to comply with its statutory authority as discussed above in item number one of this supporting statement.

- 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 – **“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 than 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 – **“Not Applicable”**; 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 – **“Not Applicable”**.
- 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.**

In accordance with 5 CFR 1320.8(d), the agency’s notice announcing this collection of information appeared in the Federal Register on June 4, 2024 (Volume 89, No 108, Page 47977). The public was given until August 5, 2024, to submit comments on the proposed information collection. There were no comments(s) received.

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

There will be no payments or gifts provided to cooperative agreement awardees.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

The Privacy Act of 1974 provided privacy protection to respondents. There are no assurances of confidentiality provided. Applications not otherwise protected may be released under the Freedom of Information Act. This collection does not require a system of records notice (SORN) or privacy impact assessment (PIA). No assurances of confidentiality will be provided.

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 questions of a sensitive nature are asked during either the application or post-award process.

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 chart below; 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.**

The burden table below reflects the annual burden estimated for the set of required post-award deliverables for all HUDRD cooperative agreements awardees, including awardees

of HUD’s Research Partnerships program and HUD’s Centers of Excellence initiative. Because HUD cannot predict in advance precisely how many awards will be made under these different funding opportunities, the data represents HUD’s best estimate for the number of awards that will be made. PD&R manages the HUD Research, Evaluation, and Demonstration cooperative agreement program (HUDRD), the Research Partnerships program, and HUD’s Centers of Excellence initiative program. HUD expects to award 25 grants over the course of the three-year period.

Table 1: Estimated Hour and Cost Burden of Information Collection

Information Collection	Number of Respondents	Annual responses	Total responses Annually	Burden Hours Per Response	Total Burden Hours	Salary	Total Burden Cost
Quality Control Plan	25	1	25	6.6	165	\$49.14	\$8,108.10
Management and Work Plan	25	1	25	13.2	330	\$49.14	\$16,216.20
Sustainability Plan	7	1	7	13.2	92.4	\$49.14	\$4,540.53
Research Design	29	1	29	52.8	1531.2	\$49.14	\$75,243.16
Quarterly Progress Reports	33	1	33	16	528	\$49.14	\$25,945.92
Final Research Report	33	1	33	79.2	2613.6	\$49.14	\$128,432.30
Final Narrative Report	33	1	33	1.65	54.45	\$49.14	\$2,675.67
Total	-	-	-	-	5,314.65	-	\$261,161.88

The total annual burden of this collection is expected to be 5,315.65 hours. The total estimated annual cost for this information collection is \$261,161.88. To estimate the hourly cost per respondent, HUD used the Department of Labor Bureau of Labor Statistics’ most recent (May 2023) on the State and local government workers by occupational and industry group <https://www.bls.gov/oes/2023/may/oes193099.htm> , we estimate these members of the Washington, DC metropolitan area Social Scientists and Related Management, professional series, to have an average hourly rate to be \$49.14.

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 already reflected on the burden worksheet 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 are no additional cost burdens for respondents or record keepers beyond the labor-cost of burden hours described in item 12 above.

- 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.**

PD&R manages the HUD Research, Evaluation, and Demonstration cooperative agreement program (HUDRD), the Research Partnerships program, and HUD's Centers of Excellence initiative program. HUD expects to award 25 grants over the course of the three-year period.

HUD estimates the number of each deliverable that will be submitted over the course of the three-year period with the burden hours per response of 37 hours (# hours a federal employee will spend reviewing deliverables) over the course of the three-year period.

The estimated total annual burden hours of 1088 are for the three-year period.

The estimated annualized cost to the Federal Government is based on the hourly rate of \$75.70, of the 2024 General Pay Scale for a GS 14 Step 5 which represents the staff of HUD's Office of Policy Research and Development (PD&R).

1088 (Annual Burden Hours X \$75.70= \$82,361.60

(The estimated annualized cost to the Federal Government)

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hours Per Response	Annual Burden Hours	Hourly Cost Per Response	Total cost
Quality Control Plan	25	1	25	1	25	\$75.70	\$1,892.50
Management and Work Plan	25	1	25	2	50	\$75.70	\$3,785.00
Sustainability Plan	11	1	11	8	88	\$75.70	\$6,661.60
Research Design	25	1	25	12	300	\$75.70	\$22,710.00
Quarterly Progress Reports	25	12	25	1	300	\$75.70	\$22,710.00
Final Research Report	25	1	25	1	25	\$75.70	\$1,892.50
Final Narrative Report	25	1	25	12	300	\$75.70	\$22,710.00
Total				37	1,088		\$82,361.60

15. Explain the reasons for any program changes or adjustments reported in Items 12 and 14 of the Supporting Statement.

This submission is a revision to a currently approved collection.

The required forms above, each cooperative agreement recipient will be required to submit a standard set of deliverables over the course of the award period of performance. These requirements are outlined in the Terms and Conditions of each award. Because the structure and content of each deliverable will be tailored to the work to be carried out under the cooperative agreement, these reports will not use an existing standard form but are described in general terms in the Terms and Conditions. This language is provided below, and the burden imposed by these items are presented in the response to question 12.

- Quality Control Plan: a written document that outlines the awardees proposed approach to quality control of all research activities and written deliverables to be produced over the period of performance.
- Management & Work Plan: a written document that outlines the expected workflow for the project over the period of performance, providing a project timeline, the allocation of staff and other resources to each task, and a strategy to address any potential challenges to completing the project on time and within budget.
- Sustainability Plan: a deliverable required only of recipients of Centers of Excellence funding. This document describes the awardee's detailed plan for the establishment, sustainability, and ongoing financial stability of the Center of Excellence after the conclusion of the HUD/PD&R funding.

- Research Design-: a technical blueprint to the completion of funded research project, including key research question(s) to be addressed, a strategy for accessing/collecting the necessary data, proposed analytic methods, and an outline of proposed deliverables.
- Quarterly Progress Reports: a narrative summary of accomplishments of the awardee over the prior quarter, discussion of any deviations from the initial schedule of progress, and a summary of how those deviations impact the project and what the Grantee recommends for handling the deviation.
- Final Research Report: the culmination of the overall research effort supported by the cooperative agreement. The report must be of publication quality and thoroughly describe the research objectives, the methodology, and the findings.
- Final Narrative Report: provides the final breakdown of overall award spending over the course of the full period of performance.

HUD/PD&R uses these deliverables to monitor the progress of the research being carried out under the cooperative agreement and to monitor the use of the funding and authorize payments to the awardee.

There are two primary program changes of note in this revision:

- This revision includes only the post-award materials that cooperative agreement recipients will be required to submit to HUD over the course of the period of performance of their grant. Pre-award materials submitted by applicants are no longer included in this ICR because they are now covered under HUD's generic clearance (OMB Control Number 2501-0044).
- This revision covers an expanding portfolio of cooperative agreements that are funded by PD&R, including the HUD Research, Evaluation, and Demonstration cooperative agreement program (HUDRD), the Research Partnerships program, and HUD's Centers of Excellence initiative. The burden calculations have been adjusted to reflect an expanded number of potential awardees.

16. For collections of information whose results will be published, outline plans for tabulation and publications. 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.

HUD/PD&R anticipates publishing the final research reports that result from the awards under HUD's Research, Evaluation, and Demonstration cooperative agreement program. Research reports will be published in accordance with the Management and Work Plan that is established for each award and therefore will be published through 2025, 2026, and 2027. All reports are published on www.huduser.gov.

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 for this information collection.

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

This submission describing data collection requests no exceptions to the Certificate for Paperwork Reduction Act (5 CFR 1320.9).