

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT GENERIC SOLUTION FOR SOLICITATION FOR HUD'S COMPETITIVE DISCRETIONARY FUNDING OPPORTUNITY ANNOUNCEMENTS

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 regulation mandating or authorizing the collection of information.

The United States Department of Housing and Urban Development (HUD) is required by 2 CFR 200.204 to publicly announce the availability of discretionary awards¹ that are competed. For the purpose of this supporting statement and associated supporting statements, an announcement is any paper or electronic issuance that HUD uses to announce a funding opportunity, whether it is called a "notice of funding opportunity," "funding opportunity announcement," "program announcement," "notice of funding availability," "broad agency announcement," "research announcement," "solicitation," "request for applications," "Grants.gov announcement," "Notice," or some other funding announcement type (hereinafter referred to as "funding announcements"). The specific statutes for these funding announcements cannot be identified in advance but will be included as part of each submission request to OMB.

To ensure that HUD funds are competitively awarded to applicants best suited to perform the functions of the awards, applicants are generally required to complete a two-part process. The first part of HUD's process is submission of the funding applications which consists of the Standard Form 424 (SF-424), "Application for Federal Assistance" along with mandatory and optional standard government-wide and HUD forms² (as shown in **Table 1: Estimated Burden for Respondents**), which are respectively available on [Grants.gov](https://www.grants.gov) and [hud.gov](https://www.hud.gov). The application must also include a project narrative or statement of work that, at a minimum, responds to five (5) standard award funding factors³, as well as narratives, budget and indirect cost plans, and/or other documents: to support satisfactory past performance; to comply with [fair housing and equity requirements, Federal grant requirements, and HUD administrative policy priorities](#), including requirements to conduct business in accordance with ethical standards; and to support HUD program-specific goals, Funding Opportunity goals⁴, and the goals and focus areas in HUD's Strategic Plan⁵. The standard award funding factors are: a. Capacity of the Applicant and Relevant Organizational Staff; b. Need/Extent of the Problem; c. Soundness of Approach; d. Leveraging Resources; and e. Achieving Results and Program Evaluation. HUD may add to or modify the funding factors for a specific funding opportunity to reflect statutory and regulatory limitations or program needs. HUD has administrative priorities to support: HBCUs and other minority serving institutions, Promise Zones,

¹ Discretionary awards are defined at 2 CFR 200.1: [https://www.ecfr.gov/current/title-2/part-200#p-200.1\(Discretionary%20award\)](https://www.ecfr.gov/current/title-2/part-200#p-200.1(Discretionary%20award))

² OMB approval numbers for standard forms are contained on grants.gov. OMB's previous approval of HUD forms was provided under OMB number 2501-0017 and 2501-0033.

³ Required by HUD's Grants Management Handbook: <https://www.hud.gov/sites/dfiles/OCHCO/documents/221017fullADMHRev-3.3.pdf>

⁴ Funding Opportunity Goals are required by OMB Memorandum M-22-02, <https://www.whitehouse.gov/wp-content/uploads/2021/10/M-22-02.pdf>.

⁵ FY 2022-2026 HUD Strategic Plan: <https://www.hud.gov/HUD-FY22-26-Strategic-Plan-Focus-Areas>

climate resiliency, energy efficiency, environmental justice, and underserved rural and other marginalized communities. Any modifications or additions will be included as part of each submission request to OMB.

For HUD's Continuum of Care (CoC) program, the funding application is restricted to Collaborative Applicants, Unified Funding Agencies, and High Performing Communities that have completed the CoC program Registration process. This registration process requires organizations to inform HUD about: the local geographic areas they represent; how the organization is structured for community planning purposes; and if the organization is high performing.

The second part of HUD's pre-award process usually requires negotiation between HUD and the selected applicant. A technical proposal (or technical submission) is required during the negotiation process. The technical proposal demonstrates the applicant's capabilities in accordance with the project narrative or statement of work submitted with part one of the application and/or selection criteria and other related information as specified in the funding announcement. In some cases, during the negotiation period, applicants may be asked for additional information as part of the application or offer of award that is not captured on a preexisting, approved information collection. This information will only be asked where necessary to evaluate the application, to clarify information submitted in the application, to evaluate an applicant's capabilities to run the program, or to determine the appropriate award amount. For example:

- a) Applications may be asked to describe the applicant organization, including skills, experience, biographies, history, past performance, knowledge, qualifications, capabilities, office locations, and/or organization chart.
- b) Applicants may be asked to describe other entities participating or collaborating with the applicant organization that may include businesses, workforce investment boards, Governor's office, letters of support, copies of agreements, and/or contracts.
- c) Applicants may be asked to describe a plan for implementing or achieving the program goals and meeting the needs of the program beneficiaries. Requested elements may include strategy, process, method, schedule, timeline, innovations, communications, program design, management, focus, and/or statement of work.
- d) Applicants may be asked to describe the measures of success for the plan and to provide progress reports. Requested elements may include outcomes, goals, number served, number hired, increase in wages, educational degrees, cost effectiveness, results oriented model, feedback mechanism, performance accountability, evaluation and improvement, and/or the proposed system to monitor the implementation of program activities and achievement of stated project objectives.
- e) Applicants may be asked to describe the recipients or target audience of the plan. Requested elements may include description and/or demographics of service region, occupations served, diversity, civil rights information.
- f) Applicants may be asked to include a budget plan and to describe alternative funding sources. This element may limit budgeting to direct and indirect cost amounts, or may include amounts and specific sources, supplemental sources, material support, in kind support, matching funds, and/or other support.
- g) Applicants may be asked to describe how this program can or will outlast the federal funding.
- h) Applicants may be asked to submit their most current indirect cost rate, including use of the de minimis rate.

Applicants are required to submit organizational information and Federal certification and assurances in the System for Award Management (SAM), and maintain an active registration in SAM for the life of any HUD award.

Duplicative information (including any information provided in SAM, and on the SF-424 form and accompanying mandatory forms) will not be requested on any forms approved under this collection of information, except for the minimal information necessary to allow for identification of separate forms in an application package (i.e., applicant and/or project name).

Awards made in connection with this supporting statement are subject to the general recordkeeping requirements at 2 CFR 200.334 – 200.338. This includes storing application information and any other documents necessary to support the application, selection of an application, negotiation, and any allowable pre-award costs. To ensure application and award documents are effectively tracked and recorded, HUD must also comply with its records management policies⁶. Any specific or additional program-specific recordkeeping requirements will be included as part of each submission request to OMB.

The provisions of 2 CFR 200.207 instruct Federal agencies to comply with the requirements of 5 CFR Part 1320, “Controlling Paperwork Burdens on the Public,” with regard to all forms or collection of additional information used by HUD in place of or as a supplement to the SF-424 series.

While HUD has previously sought approval of information collection by individual programs, HUD recognized that much of the collection involve similar information. As such, HUD is now seeking approval of a generic application to cover elements like those listed above that may not be captured on an existing, approved standard forms. HUD will only use this collection for funding announcements that collect the information noted above. If additional information is to be collected, HUD will prepare a distinct collection for the program, with the required 60- and 30-day Federal Register notices.

OMB approval of this generic application will assist HUD to carry out its responsibilities under the Paperwork Reduction Act by accurately accounting for the public burden associated with applications for HUD funding that is competitively awarded through promoting a common structure for reporting the information collection requirements contained in HUD’s funding announcements.

HUD recommends approval of the following review procedures for this generic collection clearance:

1. This generic collection encompasses a set of broadly defined data elements that are common to HUD funding announcements (see Part A.1., above). This does not represent an actual funding announcement, and is not intended to be used verbatim. Rather, the elements in this form encompass the range of topics that applicants are asked to address in their application. In composing funding announcements and detailing the eligibility criteria for those announcements, HUD will request approval to collect the information listed in Part A.1 (above), and may reword and combine criteria to best meet the goals of the program. HUD will submit the following information for OIRA:
 - a. Statute underlying the funding opportunity;
 - b. Information being collected that is not covered on standard form SF-424;

⁶ Departmental Records and Information Management Handbook, HUD 2228.1:
https://www.hud.gov/program_offices/administration/hudclips/handbooks/admh/2228.1

- c. Estimated burden hours for this information; and
 - d. Any unique start-up or operational and maintenance costs that result from the collection of this information.
- 2. HUD will disclose the paperwork requirements, associated burden, and OMB number in all funding announcements and associated forms. Specifically, all funding announcements and associated forms will include the following PRA burden statement, with the highlighted text to be updated as appropriate. This statement assumes the collection does not meet the threshold for a Privacy Act statement.

This collection of information is estimated to average ## hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of the requested information. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to: U.S. Department of Housing and Urban Development, Office of the Chief Data Officer, R, 451 7th St SW, Room 8210, Washington, DC 20410-5000. Do not send completed forms to this address. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid OMB control number. This agency is authorized to collect this information under Section 102 of the Department of Housing and Urban Development Reform Act of 1989. The information you provide will enable HUD to carry out its responsibilities under this Act and ensure greater accountability and integrity in the provision of certain types of assistance administered by HUD. This information is required to obtain the benefit sought in the grant program. Failure to provide any required information may delay the processing of your application and may result in sanctions and penalties including of the administrative and civil money penalties specified under 24 CFR §4.38. This information will not be held confidential and may be made available to the public in accordance with the Freedom of Information Act (5 U.S.C. §552). The information contained on the form is not retrieved by a personal identifier, therefore it does not meet the threshold for a Privacy Act Statement.

- 3. The Department will disclose the paperwork requirements, associated burden, and OMB number in all funding opportunities. Any forms used in connection with a funding opportunity will disclose the same information.
- 4. HUD's Office of Chief Data Officer under the Office of Policy, Research, and Development will review all funding opportunities for compliance with the Paperwork Reduction Act and the terms agreed upon in this information collection request.
- 5. Funding announcements submitted under this generic funding announcement form will be submitted to OMB at least seven business days prior to the publication of the funding announcement in the Federal Register.
- 6. HUD will monitor the number of responses and burden associated with the funding opportunity information collection requirements submitted under this approval. At the end of the year, HUD will include this burden in its Information Collection Budget report.

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 collected in response to solicitations for applications has been and will be used by HUD to evaluate applications and issue awards to the applicants most suited for fulfilling the mission of the HUD program. HUD may append the uses for a specific funding opportunity to reflect statutory and regulatory requirements or program needs. Additional use information will be included in child/subordinate collections.

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.

HUD receives applications via OMB approved application systems, including the government-wide e-grants initiative ("Grants.gov") located online at <http://www.grants.gov>, and eSNAPS located online at <http://www.esnaps.hud.gov>. Applicants also submit information with their SAM registration, which is used to authenticate applicants in grants.gov and esnaps.hud.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 information collected in HUD's funding announcements is unique to each announcement; therefore, it is not duplicated in any other source. As applicable, the Department utilizes currently approved standard forms and will not duplicate information collected on these forms.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

To limit the burden imposed on respondents, the Department requires the minimum information needed to award funding. HUD program offices have existing structures and resources in place for evaluating applications, awarding funds, and managing awards.

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.

HUD activities regarding funding awards would be significantly hindered if it were not able to collect the information required to evaluate potential award recipients.

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;
- 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 that 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 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.

The Department will ensure that all collections of information contained in its NOFOs comply with 5 CFR § 1320.5. Any exceptions to this general rule will be included as part of each submission request to OMB.

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 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.

HUD published a 60-day pre-clearance Federal Register notice on October 6, 2023 (88 FR 69647). The Department received no comments. However, prior to publication of the 60-day notice, HUD program offices coordinated on the development of this supporting statement. Content that was common amongst the existing program office information collections was consolidated into this supporting statement.

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

HUD does not provide any payment or gift to respondents in connection with this information collection request.

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

In general, HUD makes no assurance of confidentiality to those responding to funding announcements and associated forms, unless otherwise explicitly indicated. Any special circumstances will be included as part of each submission request to OMB. However, as a practical matter, disclosures are only made in compliance with the Freedom of Information Act (FOIA) and HUD regulations implementing that statute.

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.

In general, application requirements in funding announcements and associated forms do not ask questions of a sensitive nature. Any special circumstances will be included as part of each submission request to OMB.

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.**
- **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 under 'Annual Cost to Federal Government'.**

HUD bases the following estimates on historical experience. HUD's average of 45 funding announcements per fiscal year will fall under this generic request, plus an expected average of 10 NOFOs derived from supplemental funding enacted outside of the regular appropriations process. Additionally, the Department projects that it will receive approximately 30,000 applications annually.

HUD estimates it takes an average of 60 working hours to prepare and submit an application in grants.gov in response to a funding announcement. For applications submitted through esnaps.hud.gov, HUD estimates it takes an average of 100 working hours, including completing the registration in esnaps.hud.gov, preparing and submitting an application and technical submission, and proper storage of records. For purposes of this information collection request, the HUD has used the average hourly earnings of a Project Management Specialist (\$48.85⁷ per hour) to monetize the value of respondent time. Therefore, the burden for these reporting activities is as follows using average response times:

$$\begin{aligned} 30,000 \text{ applications} * 160 \text{ hours} * 1.2 \text{ frequency} &= 5,760,000 \text{ hours} \\ 5,760,000 \text{ hours} * \$48.85 &= \$ 281,376,000 \end{aligned}$$

Details related to this estimated burden are included in . The actual burden is assessed against each HUD program submission.

⁷ Median hourly rate for "Project Management Specialists" (occupation code 13-1082), May 2022 National Occupational Employment and Wage Estimates United States, https://www.bls.gov/oes/2022/may/oes_nat.htm.

Table 1: Estimated Burden for Respondents

Information Collection (OMB Control Number)	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response⁸	Annual Cost
SF 424 (4040-0004)	0	0		0	0	0	0
SF-424B (4040-0007)	0	0		0	0	0	0
SF-424D (4040-0009)	0	0		0	0	0	0
SF 424A (4040-0006)	0	0		0	0	0	0
SF-424C (4040-0008)	0	0		0	0	0	0
SF LLL (4040-0013)	0	0		0	0	0	0
Lobbying Form (4040-0013)	0	0		0	0	0	0
Project Abstract Summary (4040-0019)	0	0		0	0	0	0
HUD-424B	30,000	1.2	36,000	0.5	18,000.00	\$48.85	\$879,300.00
HUD-424CB	1,375	1.2	1,650	3	4,950.00	\$48.85	\$241,807.50
HUD-424CBW	1,375	1.2	1,650	3	4,950.00	\$48.85	\$241,807.50
HUD-424M	250	1.2	300	0.5	150.00	\$48.85	\$7,327.50
Program specific budget plan (including indirect cost amounts)	30,000	1.2	36,000	2.75	99,000.00	\$48.85	\$4,836,150.00
HUD-426 (indirect cost plan)	30,000	1.2	36,000	.25	9,000.00	\$48.85	\$439,650.00
HUD-2880	30,000	1.2	36,000	2	72,000.00	\$48.85	\$3,517,200.00
HUD-50070	30,000	1.2	36,000	0.25	9,000.00	\$48.85	\$439,650.00
Rural Partners Certification	800	1.2	960	0.50	480.00	\$48.85	\$23,448.00
HUD 50153	800	1.2	960	0.25	240.00	\$48.85	\$11,724.00
HUD 2991	30,000	1.2	36,000	3	108,000.00	\$48.85	\$5,275,800.00
HUD 2993	30,000	1.2	36,000	0.25	9,000.00	\$48.85	\$439,650.00
Admin, national policy, and Program specific requirements,	30,000	1.2	36,000	140	5,760,000.00	\$48.85	\$246,204,000.00

⁸ Median hourly rate for “Project Management Specialists” (occupation code 13-1082), May 2022 National Occupational Employment and Wage Estimates United States, https://www.bls.gov/oes/2022/may/oes_nat.htm.

including rating factors (narrative and other attachments)							
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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 already reflected on the burden worksheet).

- 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 costs other than monetization of hourly burden as captured above in Item 12.

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.

HUD bases the following estimates on historical experience. HUD estimates it takes an average of 30 working hours for HUD to complete its pre-award activities associated with competitive applications, including parts 1 and 2 of the application process. This includes activities related to proper storage of related records. For purposes of this information collection request, HUD has used a GS 13 step 5 rate (\$51.25⁹ per hour) to monetize the value of HUD time. Therefore, the burden for pre-award activities is as follows using average response times:

$$\begin{aligned}
 &30,000 \text{ applications} * 30 \text{ hours} * 1.2 \text{ frequency} = 1,080,000 \text{ hours} \\
 &1,080,000 \text{ hours} * \$51.25 = \$55,350,000
 \end{aligned}$$

⁹ Using [OPM's "Rest of the United States" hourly rates for 2022](#), Federal staff time is estimated for a GS-13 step 5 at \$51.25 per hour.

If Department incurs any unique start-up or operational and maintenance costs with the collection of information covered by this ICR, HUD will include them on the request to OMB.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

None.

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.

The information may be made available publicly depending on requests from OMB, Congress, or Federal agencies with appropriate authority. Also, individual HUD programs may assess needs to publish information. When this information is used to inform public reports or is otherwise reported publicly, HUD will ensure adequate discussion is included regarding validity concerns and biases in how this data is collected by grantee organizations and aggregated by HUD. This discussion may acknowledge certain limitations to this dataset including: (1) the inability for grantee organizations to report non-responses or refused response data and a lack of clarity as to how these data-points are reported to HUD; (2) potentially varied collection methods, including both self-identification and proxy reporting (which may present validity issues); and (3) any inadvertently skew in the aggregate reporting data. Following internal consultation, HUD may also choose to discuss additional sources of error or bias.

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 include the OMB control number and expiration date on all funding announcements.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

HUD is not seeking an exception to the certification statement.

Part B. Statistical Methods

This information collection does not employ statistical methods.