

## Request for Approval under the Generic Solution for Solicitation for Competitive Discretionary Funding Opportunity Announcements

**Funding Opportunity Announcement Title:** PDR: Research on Financing and Other Non-Zoning Barriers to Increasing Missing Middle Housing Supply

**HUD Program Office/Agency:** [Select One](#)

Other: Policy Development and Research

**HUD Office/Agency Point of Contact:**

[Alexander Din](#)

[Katina Norwood](#)

**Alignment with Information Collection Package:** (Check one)

☐ Funding Opportunity for Existing Program.

☒ Funding Opportunity for New Program.

### Purpose

*Briefly describe the program. Include specific statutes and regulations. Explain the information to be collected to clearly describe to OMB the requirements and burden on the respondents. The description must align with and provided detail on the information included in the parent supporting statement. For example, if the respondent burden table below shows 50 burden hours for project summary, provide additional detail elaborating on what the respondents are required to provide to meet that requirement. For existing programs, the information included here may resemble the information you would have submitted in question number 1 in your existing/previously approved ICR. Also, include and clearly label any exceptions to the activities described in the parent supporting statement. If revising an approved collection, highlight key changes to the collection.*

The Office of Policy Development and Research (PD&R) received funding to research missing middle financing. This research is authorized by Sections 501 and 502 of the Housing and Urban Development Act of 1970 (12 U.S.C. §1701z-1 and §1701z-2) and funding is provided by the Consolidated Appropriations Act, 2024 (Public Law No:118-42, approved March 9, 2024). See also the Joint Explanatory Statement, to accompany H.R. 4366 (enacted as Pub. Law 118-42) and published in the Congressional Record on March 5, 2024, available online at <https://www.congress.gov/118/crec/2024/03/05/170/39/CREC-2024-03-05.pdf> (see p. S. 1876).

HUD's mission is to create strong, sustainable, inclusive communities and quality affordable homes for all. Research under this NOFO will help meet HUD's Strategic Goal 2: Ensure Access to and Increase the Production of Affordable Housing under [HUD's FY 2022-2026 Strategic Plan](#). Research funded under this Notice of Funding Opportunity (NOFO) is intended to help HUD and other stakeholders understand the financing and other non-zoning barriers to constructing missing middle housing and how these barriers might be overcome at the federal, state, and/or local level to increase the supply of housing in the United States. Research funded under this NOFO will also further HUD's mission help strengthen the housing market to bolster the economy.

The collection of information associated with this NOFO will be used by PD&R to evaluate the NOFO applicant and determine eligibility to receive award funds.

**Refer to tables below for frequency of information collection and HUD's associated burden.**

## Application

HUD expects to receive approximately ten grant applications from eligible institutions which are:

- Public and State Controlled Institutions of Higher Education
- Nonprofit with 501(c) (3) Status with IRS, Other than Institutions of Higher Education
- Nonprofit without 501(c)(3) Status with IRS, Other than Institutions of Higher Education
- Private Institutions of Higher Education
- For Profit Organizations Other than Small Businesses
- Small Businesses
- Minority Serving Institutions (MSIs)

Applicants will respond to the NOFO published in the Federal Register to receive an award. Applicants must, prior to award, complete the following submissions:

## Electronic Submission

Applicants submit their applications electronically through [Grants.gov](https://www.grants.gov), unless they receive a waiver. Electronic submission eliminates the burden on applicants to print, organize and ship multiple copies of their application. Additionally, [Grants.gov](https://www.grants.gov) automatically populates common elements of many forms, so that standard information about the applicant that appears on several forms only needs to be entered once. To use [Grants.gov](https://www.grants.gov), applicants are required to submit organization information, certifications, and assurances via [sam.gov](https://sam.gov). HUD uses the interface between [Grants.gov](https://www.grants.gov) and [GrantSolutions](https://www.grantsolutions.gov) to retrieve applications. Review is conducted using [GrantSolutions](https://www.grantsolutions.gov). Any application materials that have the potential to include PII (the SF-424) remain in [GrantSolutions](https://www.grantsolutions.gov).

HUD stores the information collected via applicants' Ratings Factor Narrative responses and additional documents in its own HUD Sharepoint site on its HUD servers and takes all necessary steps to safeguard the information while complying with federal mandates, guidance and HUD security policies and procedures.

## Pre-Award Data Collection – Application Forms

PD&R anticipates ten grant applications for this NOFO. Applicants must be in the eligible institution categories listed above. Each applicant submits a detailed proposal addressing the particular requirements of the NOFO. The information is used by HUD staff to evaluate NOFO applicants and determine eligibility to receive award funds. The HUD NOFO team leads develop the scoring criteria and train HUD staff on how to conduct the scoring of applications. Applicant proposals are scored by teams using a process that ensures fairness and confidentiality. The main component of this analysis is the Ratings Factor Narrative, described below. Additional materials are submitted in support of the content of the Ratings Factor Narrative.

### **Each research project proposal must contain the following:**

1. Abstract: A one-page synopsis of the proposed project that outlines the proposed research and the funding request in whole dollar amount.
2. Ratings Factor Narrative: A Ratings Factor Narrative of no more than 20 pages, addressing all Rating Factors. The narratives are scored using the following three rating factors:
  - Rating Factor 1: Contribution of the Proposed Research
  - Rating Factor 2: Soundness of Approach
  - Rating Factor 3: Recent Organizational Experience and Organizational Capacity, and Project Staffing
3. Required Supporting Materials to support the applicant's Abstract and Ratings Factor Narrative, which do not count toward the 20-page limit:
  - Resume Appendix which contains resumes for up to 3 key personnel, each of which should not exceed 2 pages.

- Partnership Appendix which contains the entities with which the applicant has entered into an agreement to participate in an award under this NOFO and include a brief statement of each entity's qualifications. The Partnership Appendix shall include letter(s) of support from each entity collaborating in the proposed project. The letter(s) of support shall include the partnering entity's expression of support for the project, a statement of willingness to collaborate in the project, a description of the collaborative entity's role in the project, and resources to be contributed to the project, as applicable. If the applicant is not partnering with other entities, then the Partnership Appendix is still required but should simply state that the applicant is not partnering with other entities (10-page limit).
- Minority Serving Institution (MSI) Documentation which verifies the applicant is an MSI or has partnered with an MSI, including a letter from the MSI expressing such partnership. This statement and/or letter is separate from the Partnership Appendix (2-page limit and only required if seeking MSI preference points).
- Equity Narratives which address three specific topics: Advancing Racial Equity, Experience Promoting Racial Equity, and Affirmatively Furthering Fair Housing. Each narrative has a 2-page limit (6 pages total).
- Grant Application Detailed Budget Worksheet (HUD-424-CBW) which displays all anticipated costs during the period performance period, including an indirect cost rate if applicable.

### Standard Application Forms

**Form SF-424**, Application for Federal Assistance. (OMB Approval No. 4040-0004). Expiration Date: 11/3/2025. Once a year submission for agencies requesting grant funding.

**Form SF-424B**, Assurances for Non-Construction Programs (OMB Approval No. 4040-0007). Expiration Date: 02/28/2025. This form is required when applying for Federal financial assistance under non-construction grant programs.

**Form SF-LLL**, Disclosure of Lobbying Activities (OMB Approval No. 4040-0044). Expiration Date: 11/30/2025. Once a year submission for agencies requesting grant funding and updated as needed during the pre-award phase.

**Form HUD-2880**, Applicant/Recipient Disclosure Update Report. (OMB Approval No. 2501-0044). Expiration Date: 2/28/2027. Once a year submission for agencies requesting grant funding and updated as needed during the pre-award phase.

**Form HUD-424B**, Assurances. (OMB Approval No. 2501-0044). Expiration Date: 2/28/2027. All recipients and subrecipients of the award are required to submit assurances of compliance with federal civil rights requirements. Once a year submission for agencies requesting grant funding and updated as needed during the pre-award phase.

**Form HUD 424-CBW**, Grant Application Detailed Budget Worksheet. (OMB Approval No. 2501-0044). Expiration Date: 2/28/2027. Once a year submission for agencies requesting grant funding and updated as needed during the pre-award phase.

**Certification Regarding Lobbying Activities**, (OMB Approval No. 4040-0013). Expiration Date: 2/28/2025. Once a year submission for agencies requesting grant funding and updated as needed during the pre-award phase. All applicants except Federally recognized Indian tribes must submit this certification with their application.

**Code of Conduct.** Award recipient and all subrecipients must have a code of conduct (or written standards of conduct) that complies with the requirements included in the "Conducting Business in Accordance with Ethical Standards" section of the Administrative, National and Department Policy Requirements and Terms for HUD Financial Assistance Awards—2024. HUD maintains a list of organizations that have previously submitted written standards of conduct on its Code of Conduct for HUD Grant Programs webpage

([https://www.hud.gov/program\\_offices/spm/gmomgmt/grantsinfo/conductgrants](https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/conductgrants)).The awardee has responsibility to ensure that the standards are compliant with the noted requirements and that HUD has the latest version of the written standards. Updated written standards should be submitted with the application. Any updates to your written standards, after the application period, should be submitted as directed by the HUD program contact for this NOFO.

#### Curables

Applicants that fail to submit any of the required standard application forms or the three required equity narratives may cure that deficiency. A sample deficiency letter is included in this package.

#### Negotiation

Included with this child information collection is a sample email template and award package. During negotiation, applicants are given an opportunity to make technical updates to their application before signing the grant agreement.

### **Changes Since Previous Approval**

This is the first award for this NOFO.

**Announcement Dates (Start and End Dates for Applications):** We anticipate this being a one-time NOFO to be published in January 2025. Applications will be due 45 days from publication date.

#### **Type of Collection (Federal Award Instrument):** (Check all that apply)

- ☐ Grant
- ☒ Cooperative agreement
- ☐ Other:

#### **How will information collected be submitted to the HUD Office/Agency?** (Check all that apply)

- ☒ Grants.gov
- ☐ esnaps.hud.gov
- ☐ Other:

#### **Does the HUD Office/Agency need to collect information beyond the scope of the supporting statement for the generic ICR?** ☐ Yes ☒ No

If yes, will the HUD Office/Agency submit a regular ICR package?

- ☐ Yes
- ☐ No

#### **How does this collection minimize the burden on small businesses/entities, if applicable?**

*For existing programs, the information included here may resemble the information in question 5 in your existing/previously approved ICR.*

The information collection is the same for all entities, regardless of size, but is considered to be the minimal information needed for HUD to effectively administer this NOFO. The electronic grant application process eliminates the burden on all applicants to print, organize, and mail multiple copies of their application. [Grants.gov](https://www.hud.gov/grants) automatically populates common elements of many forms, so that standard information about the applicant that appears on several forms only needs to be entered once.

**If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

*Consult your Privacy Act Officer before responding to this item. The information included here may resemble the information in question 10 in your existing/previously approved ICR.*

A SORN is not required because records are not retrievable by individual identifier. A PIA is not required because records are not retrievable by individual identifier.

**Sensitive Information:**

Is the agency asking any questions of a sensitive nature? If yes, 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. Include the reasons justifying 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.

*Consult your Privacy Act Officer and the FHEO before responding to this item. For existing programs, the information included here may resemble the information in question 11 in your existing/previously approved ICR.*

There are no questions of a sensitive nature.

☐ Yes      ☒ No

If yes, additional information:

**Certification:**

I certify the information contained in this document to be true and accurate:

☒ Yes      ☐ No

**Respondent Burden Hours, Formats, and Reporting**

*Include in the table the collection items and burden amounts associated with responding to a notice of funding opportunity (NOFO) and other pre-award activities. The burden included in this chart must align with the parent supporting statement. If preparing a new form, indicate "new" under the Form Number column. Existing forms number can remain unchanged, but the actual forms need to be updated with the OMB approval number for this generic collection. Also include the burden associated with responding to the rating factors and completing other narratives requested via the NOFO or other pre-award activities.*

*For existing programs, the information added here may resemble the information you would have submitted in question number 12 in your existing/previously approved ICR. All forms must accompany this Template for submission to OMB for approval. Do not list the required standard forms from the generic support statement; however, please list optional standard forms from the parent supporting statement. For the optional standard forms, do not include burden information, unless the burden is unique to the program.*

**Research on Missing Middle Financing and Other Non-Zoning Barriers to Increasing Housing Supply NOFO**

This NOFO is designed to collect the minimum amount of information required to sufficiently determine eligibility threshold and meaningfully rate and rank applicants. The NOFO includes clear instructions and prompts for applicants to develop responsive proposals. We believe that the 40 hours estimated in the table below is conservative, and that the actual number of hours, which varies by applicant, could be significantly lower.

Each Narrative and Attachments submission is expected to be prepared by a business and financial operations professional at the cost of \$42.50 per hour (which includes the wage rate multiplier), based on the Department of Labor Bureau of Labor Statistics' most recent data (May 2023) on the State and local government workers by occupational and industry group ([https://www.bls.gov/oes/2023/may/oes\\_nat.htm](https://www.bls.gov/oes/2023/may/oes_nat.htm)), for 13-0000 Business and Financial Operations Occupations, professional series (average hourly rate of \$42.33 rounded to \$42.50). The applicant burden cost is set forth in the following table:

	Number of Respondents	Average Burden Hours	Cost per Hour	Total Cost
Applicants	10	40	\$42.50	\$17,000
Awardees	1	4	\$42.50	\$170
Total				\$17,170

Brief description of information being collected (project summary, charts, narrative response)	Forms number	Number of Respondents	Number of Responses per Respondent	Total Annual Responses	Burden Hours per Response
<a href="#">NOFO Abstract, Ratings Factor Narrative, Supporting Materials, and MSI documentation, if applicable.</a>	Not applicable	10	1	10	40
<a href="#">Application for Federal Assistance (4040-0026)</a>	SF-424	10	1	10	N/A
<a href="#">Disclosure of Lobbying Activities (4040-0013)</a>	SF-LLL	10	1	10	N/A
<a href="#">Assurances for Non-construction Programs (4040-0007)</a>	SF-4242B	10	1	10	N/A
<a href="#">HUD Applicant and Recipient Assurances and Certifications (2501-0044)</a>	HUD-424B	10	1	10	N/A
<a href="#">Grants.gov Lobbying Form (4040-0013)</a>		10	1	10	N/A
<a href="#">Grant Application Detailed Budget Worksheet (2501-0044)</a>	HUD-424CBW	10	1	10	N/A
<a href="#">Applicant Disclosure Report Form (2501-0044)</a>	HUD-2880	10	1	10	N/A
<a href="#">Curing Deficiencies</a>	Not Applicable	5	1	5	1
<a href="#">Submissions related to Negotiations</a>	Not Applicable	1	1	1	4
<b>TOTAL</b>					

## Federal Burden Hours, Formats, and Reporting

*Include in the table the collection items and burden amounts associated with HUD's review of the collected item for NOFOs and other pre-award activities. Include burden associated with reviewing eligibility as well as rating factors. For existing programs, the information added here may resemble the information you would have submitted in question number 14 in your existing/previously approved ICR.*

	Number of Respondents	Average Burden Hours	Cost per Hour	Total Cost
Eligibility Threshold Review	10	1	\$88.50	\$885
NOFO Application Review	7	24	\$88.50	\$14,868
Negotiations	1	6	\$88.50	\$531
Total				\$16,284

GS 13, Step 3 employee, 2024 OMB Salary Table \$125,827 x 1.46 (wage rate multiplier) (\$183,707; \$88.32 per hour rounded to \$88.50)

<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/24Tables/html/DCB.asp>

Brief description of information being collected (project summary, charts, narrative responses, etc.)	Form number	Number of Respondents	Number of Responses per Respondent	Total Annual Responses	Burden Hours per Response
Eligibility Threshold Review		10	1	10	1
NOFO Abstract, Ratings Factor Narrative, Supporting Materials, and MSI documentation, if applicable.		7	1	7	24
Negotiations		1	1	1	6
<b>TOTAL</b>				18	