# Supporting Statement for Paperwork Reduction Act Submissions Jobs Plus Pilot Program (OMB Control No. 2577-0281)

#### 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.

This request is for a revision to the existing Jobs Plus information collection (OMB Control No. 2577-0281). The information collected is not expected to frequently change; therefore, the Department of Housing and Urban Development (HUD) is seeking a regular three-year approval of the information collection. The information collection is required to administer the Jobs Plus grant program, which includes grant application and award, as well as grant and program administration. The funding and program authority for Jobs Plus is provided by the appropriations act for each Fiscal Year (FY), which most recently included the Consolidated Appropriations Act, 2022 (Public Law 117-103, approved March 15, 2022), the Consolidated Appropriations Act, 2023 (Public Law 117-328, approved December 29, 2022), the Consolidated Appropriations Act, 2024, (Public Law 118-42, approved March 9, 2024) (i.e., the "Jobs Plus Program Authorization"), and the Full-Year Continuing Appropriations and Extensions Act of 2025 (Public Law 119-4, approved March 15, 2025). FY2014 was the first FY for which funds were appropriated and awarded. The Jobs Plus grants are governed by each FY's Notice of Funding Opportunity (NOFO) and the Grant Agreements executed between each grant recipient and HUD.

The governing program authorizations (i.e., the appropriations acts) require that the grants be competitively awarded, which means information has to be collected from applicants in order to award the funds (this is done through the NOFO and competition process described below). Additionally, the program requires via the grant agreement that grantees provide information concerning program performance and administration (i.e., grantee reporting). Information must be collected (as provided in this information collection) in order to fulfill these requirements.

The appropriations acts also establish program purpose and eligibility requirements that must be followed. The Jobs Plus program develops locally-based, job-driven approaches that increase earnings and advance employment outcomes through work readiness, employer linkages, job placement, educational advancement, technology skills, and financial literacy for residents of public housing. The place-based program addresses poverty among public housing residents by incentivizing and enabling employment through a financial/rent incentive for working residents and a set of services designed to support work including employer linkages, job placement and counseling, educational advancement, and financial counseling. Ideally, these incentives will saturate the target public housing developments, building a culture of work and making working residents the norm. Eligible applicants are public housing authorities (PHAs) and applications must target an eligible public housing project(s). Grantees

are expected to develop key partnerships connect participants with needed services to remove barriers to work. The appropriations acts require grantees to partner with the local Workforce Development Boards/American Job Center (formerly known as One-Stop Center) in their area to offer multiple employment-related services for residents with a range of employment needs.

- 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 is a revision to an existing collection. Eligible applicants interested in obtaining Jobs Plus grant funds are required to submit applications to HUD, as explained in the NOFOs. The information collection covers the information needed from applicants to determine which applicants should be funded. The information provided includes demonstration of the applicant's need, past experience/capacity, plans to implement the grant requirements, and partner support commitments. The application includes such information as narrative exhibits, partner commitment documents, budget, and map. The information will be used by HUD staff to evaluate threshold requirements and rate and rank grant applications. Applicants that receive grant funds are required to report to HUD on their progress, enabling HUD to manage and monitor the programs. The information collection also covers the data needed to fulfill this reporting requirement, and information needed for program management. HUD reviews the information submitted by applicants/grantees and uses it to award funds and, for grantees, to manage the program.
- 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.

100% of NOFO/Grant application information collection is done electronically. All applicants, unless granted a waiver, must submit grant applications electronically to HUD via the www.Grants.gov website (a government requirement since FY2005). Applications submitted via Grants.gov are transferred to GrantSolutions.gov, the on-line system HUD uses for accessing and reviewing applications. As indicated in the NOFO, applicants must also use SAM.gov as part of the application process, related to entity and eligibility information. Technical deficiency processing is done via email, electronic file attachments and GrantSolutions. Award and grant agreement processing is done via email and file attachments. Records related to applications are maintained in electronic systems, including GrantSolutions and Sharepoint.

100% of grant administration information collection is done electronically. Grant administration materials, for implementation, including reporting, and close-out, are done electronically (e.g., email, file attachments). Grantees draw down funds using the e-LOCCS system. Records related to grant administration are maintained in HUD electronic systems, including email and Sharepoint. The automation described above helps improve data quality and program implementation, reduces burden to applicants/grantees by avoiding manual preparation and submission, and reduces processing time by removing paper/mailed submissions.

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

There is no duplication of effort. Information collected is unique to each type of collection and does not duplicate any similar information or method.

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

These information collections have no impact on small businesses or other small entities (small businesses are not eligible applicants). However, in general efforts have been made to minimize the burden placed on all applicants, while at the same time ensuring that sufficient information is provided for program purposes.

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 appropriations act requires Jobs Plus grant funds be awarded competitively. That requirement would not be met if the collection is not conducted. The information collection is necessary so that the available funds, per the appropriations act, may be awarded to successful applicants for Jobs Plus grants and then managed appropriately.

- 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 the study; **Not Applicable**
- requiring the use of 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; or **Not Applicable**
- 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**

There are no special circumstances that would cause these information collections to be conducted inappropriately.

- 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.
  - In accordance with 5 CFR 1320.8(d), the agency's notice announcing this collection of information appeared in the Federal Register on July 21, 2025, (Volume 90, No 137, page 34293). The public was given until September 19, 2025, to submit comments on the proposed information. No comment(s) were received.
- 9. Explain any decision to provide any payment or gift to respondents, other than renumeration of contractors or grantees.

No payments or gifts are provided to respondents for any of these information collections.

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.

Assurance of confidentiality is neither provided nor needed for any of these information collections.

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 questions are being asked for any of these information collections.

- 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.

Costs to the respondents to complete these information collections will not exceed those needed for regular grant application, administration, and management. The following chart outlines the burden to respondents associated with the various aspects of the Jobs Plus grant program and a breakout of the forms associated with each portion of that burden. For Jobs Plus the burden hours per response total to **60.5** for applications. Jobs Plus information collections related to grant administration, including grantee reporting and program management, total to **35**. Standard forms such as the SF 424 are not duplicative information and their burden amounts are not included. These forms are authorized under different OMB Control Numbers but are submitted as part of the Jobs Plus applications.

Information Collection	Number of Respondents Annually	Responses Annually (Frequency	Total Responses Annually	Burden Hours per Response	Total Burden Hours Annually	Hourly Cost (Salary)	Total Burden Cost Annually
NOFO/Grant Application Collection	<u>on</u>		Г	ı		Г	
SF-424 Application for Federal Assistance (4040-0004)	48	1	48	0	0	\$0.00	\$0.00
HUD-2880 Applicant Disclosure (2501-0044)	48	1	48	0	0	\$0.00	\$0.00
Certification Regarding Lobbying	48	1	48	0.25	12	\$41.39	\$496.68
SF-LLL- Lobbying (4040-0013)	48	1	48	0	0	\$0.00	\$0.00
HUD 424B Assurances and Certifications (2501-0044) Certification of Certification	48	1	48	0	0	\$0.00	\$0.00
the Consolidated Plan (HUD-2991)	48	1	48	0	0	\$0.00	\$0.00
Certification of Opportunity Zone (HUD-2996)	48	1	48	0	0	\$0.00	\$0.00
Certification for a Drug-Free Workplace (HUD-50070)	48	1	48	0	0	\$0.00	\$0.00
Map	48	1	48	2	96	\$41.39	\$3,973.44

MOU between PHA and WDB	48	1	48	2	96	\$41.39	\$3,973.44
Match/Leverage Commitment							
Letters	48	1	48	10	480	\$41.39	\$19,867.20
Schedule	48	1	48	2	96	\$41.39	\$3,973.44
Organizational chart	48	1	48	1	48	\$41.39	\$1,986.72
Executive, summary							
documentation	48	1	48	3	144	\$41.39	\$5,960.16
Rating Factor 1 – Capacity	48	1	48	10	480	\$41.39	\$19,867.20
Rating Factor 2 – Need	48	1	48	8	384	\$41.39	\$15,893.76
Rating Factor 3 – Soundness of		_				<b>***</b> 00	40004044
Approach	48	1	48	12	576	\$41.39	\$23,840.64
Detailed Program Budget	48	1	48	3	144	\$41.39	\$5,960.16
Summary Jobs Plus Budget (Form		_		_			
HUD-50144)	48	1	48	2	96	\$41.39	\$3,973.44
Narrative to Program Budget	48	1	48	4	192	\$41.39	\$7,946.88
Rating Factor 4 – Match/Leverage				_		*** **	#4 000 <b>=</b> 0
table	48	1	48	1	48	\$41.39	\$1,986.72
Rating Factor 5 – Preference							
Points Documentation (HUD-	40		40	0.05	40	<b># 44 DO</b>	# 40G GO
50153 or other)	48	1	48	0.25	12	\$41.39	\$496.68
Sub-Total NOFO/Application			40	60.5	2004		#120.100.50
Collection			48	60.5	2904		\$120,196.56
Grant Administration Collection							
Code of Conduct (if not on HUD website, if recently updated, if not							
previously submitted)	8	1	8	1	8	\$41.39	\$331.12
HUD-1044/Grant Agreement	10	1	10	0	0	\$41.39	\$0.00
Quarterly reporting	55	4	220	10	2200	\$41.39	\$91,058.00
Annual reporting	55	1	55	8	440	\$41.39	\$18,211.60
Workplan	55	1	55	14	770	\$41.39	\$31,870.30
Budget (HUD-50144)	55	1	55	2	110	\$41.39	\$4,552.90
Federal Financial Report (Form	55	1	35		110	ψ.1.35	\$ .,55 <b>2.</b> 50
SF-425) (4040-0014)	8	1	8	0	0	\$0.00	\$0.00
Sub-Total –							
Non-NOFO/Application Collection			411	35	3528		\$146,023.92
Grand Totals	103		459	95.5	6432		\$266,220.48

To estimate the hourly cost per respondent, HUD used the Bureau of Labor Statistics' most recent information on state and local government workers by occupational and industry group, specifically, BLS 11-9151 Social and Community Services Manager Local Government (URL: Occupational Employment and Wage Statistics Profiles). We estimate the members of this professional series to have a mean hourly wage rate of \$41.39.

- 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). N/A. There are no start-up or additional costs to the respondents other than those reported in Item 12.
  - 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 costs other than what is reported 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.

The primary costs to the Federal Government involve the review of applications, making of awards, and monitoring of grants. This work is done by HUD staff. For the information collection items, the estimated total cost to the Federal government is provided in the table below. The median wages for the 2025 schedule GS-13, GS-14, GS-15, all Step 1, were used to compute the federal burden in item 14. There are no start-up or additional costs.

Position/Activity	Grade	# of staff	FTE/Staff hours per year	Hourly Rate	Annualized Cost
NOFO/Grant Application Collection					
Application Reviews					
Director/Deputy Director	15	2	56	80.31	\$8,994.72
Program manager	14	2	100	68.27	\$13,654.00
Administrator/Team Leader	14	1	360	68.27	\$24,577.20
Application reviewers, Chairs	13	14	80	57.78	\$64,713.60
Sub-Total NOFO/Application Collection			596		\$111,939.52
Grant Administration Collection					
Grant managers quarterly reporting	13	10	32	57.78	\$18,489.60
Grant managers annual reporting	13	10	16	57.78	\$9,244.80

Totals			799		\$196,740.42
Sub-Total – Non-NOFO/Application Collection			203		\$84,800.90
			203		. ,
Director/Deputy Director	15	2	25	80.31	\$4,015.50
Program manager	14	2	50	68.27	\$6,827.00
425)	13	10	16	57.78	\$9,244.80
Grant managers Federal Financial Report (Form SF-					. ,
Grant managers budget	13	10	8	57.78	\$4,622.40
Grant managers work plan	13	10	56	57.78	\$32,356.80

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

<u>Overall Decrease to Respondent/Public Burden:</u> The annual burden (total number of hours) to respondents decreased by 140.75 hours (6,572.75 – 6,432), reflecting a 2.14 percent decrease from the previously approved PRA information collection.

**Program Changes**: Revision of a currently approved collection

## Adjustments for Item 13 (Item 12) Respondent/Public Burden: NOFO/Grant Application Collection

- Decreased the number of respondents for the NOFO/Application from 55 to 48 to reflect recent submissions.
- Adjusted the hourly salary for respondent to be the current information for BLS 11-9151 Social and Community Services Manager, Local Govt. (hourly mean salary =\$41.39).
- Removed burden for HUD-2880 since burden should not be included for forms that are part of another PRA. Optional forms HUD-2991, HUD-2996, HUD-50070 were added but burden is not included since they are part of another PRA.
- Increased time for Map from 1 to 2 hours to reflect included narrative that clarifies map.
- Reduced time for Match/Leverage Commitment Letters from 14 to 10 hours to reflect clarified criteria.
- The burden for HUD-50153 is 0.25, not 0.75, so that reduction was made in the collection information above in order to be consistent.

#### **Grant Administration Collection**

- Changed the name of this section of the information collection from "Non-NOFO/Application Collection" to "Grant Administration Collection" in order to clarify what it is.
- Increased the number of respondents for the Grant Administration Collection (formerly Non-NOFO/Application) from 48 to 55 to reflect size of recent and anticipated grantee cohorts.
- Added HUD-1044/grant agreement for clarity but there is no added burden because the HUD-1044, Assistance Award/Amendment is completed by HUD staff, signed by the

- recipient of the grant, and returned to HUD. This form is a certification, and HUD ascribes no burden to its use.
- Increased time for workplan from 10 to 14 to reflect program implementation needs.

#### **Adjustments for Item 14 Federal Burden:**

- Adjusted the hourly salary for respondent to use the 2025 GS scale for the respective grade (updated from 2022 information).
- Updated calculations to reflect anticipated number of grants and workload.
- Added staff time for program managers and directors to clarify and reflect processing steps.
- Decreased time on quarterly reporting to reflect workload and TA supports.
- 16. For collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The results of this collection of information will not be published for statistical use.

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.

No approval is sought to not display the expiration date for OMB approval of the information collection.

18. Explain each exception to the certification statement identified in item 19. There are no exceptions to the certification statement identified in item 19.

### B. Collections of Information Employing Statistical Methods

This information will not be collected using statistical methods.