

# Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number 2502-New

## A. Justification

### 1. Circumstances that make the collection of information necessary:

The primary purpose of the Program is to implement the provisions of the “Consolidated Appropriations Act of 2010” which authorizes HUD to create a grant program to stimulate innovative approaches for increasing the energy efficiency of existing multifamily residential properties that can be replicated by others. Awards will be made in each of two different categories: a. Financing Demonstrations, and b. Applied Research Demonstrations. A Notice of Funding Availability (NOFA), number FR-5505-N-01, published in the Federal Register on June 20, 2011 requires that applicants for grant funds provide specific information that will allow HUD to evaluate, score and rank proposals.

### 2. How, by whom, and for what purpose the information will be used:

The information is being collected in order for respondents to compete for receipt of a benefit. There is only one category of respondents and that is applicants for grant benefits. The information will be used to rate and rank applications, will be collected electronically on grants.gov, and will not be shared with parties other than HUD. The application will contain the following items:

- a. Abstract. Consisting of up to four-pages, it is a summary of the proposed project, which will not be scored and does not count toward the narrative page limit.
- b. a list of documents for each zip file; first for the abstract/summary and factor narratives file and second for the supporting document and forms file.
- c. SF424\_Application\_for\_Federal\_Assistance.
- d. SF424 Supplement Survey on Equal Opportunity for Applicants titled “Faith Based EEO Survey” (SF424SUPP) on Grants.gov (optional submission).
- e. SFLLL\_Disclosure\_of\_Lobbying\_Activities.
- f. HUD2880\_Applicant\_Recipient\_Disclosure\_Update\_Report titled “HUD Applicant Recipient Disclosure Report” on Grants.gov.
- g. HUD424CB\_Detailed\_Budget, which is a budget for all funds (federal and non-federal)
- h. Sources and Uses. Each major activity that will be undertaken must be identified as a part of the comprehensive project on the appropriate budget sheet. Each activity described must be related specifically to work described in the proposed Work Plan. Use that document to identify the source of funding and the amount of funds that will be used to carry out that particular source's share of the activities identified. Also prepare and maintain a Sources and Uses Table.
- i. HUD2993\_Acknowledgment\_of\_Application\_Receipt, for applicants submitting paper applications only.
- j. Documentation of Letters of Intent provided by third parties on their letterhead in support of Rating Factor 3, “Matching Funds and Leveraging above the Matching Funds Requirement.”
- k. If the applicant is a private nonprofit organization, a copy of its organization’s IRS ruling providing tax-exempt status, as amended, and a current certificate of good standing.
- l. If the applicant is applying as a consortium, it must provide a copy of the consortium agreement, which must be executed by all consortium members.
- m. Narrative response to Factors for Award. The total narrative response cannot exceed the equivalent of 30 single-sided standard 8-1/2” x 11” pages total in 12 point font, not including attachments.
- n. Work Plan. A proposed Work Plan as described in the NOFA must be submitted by the applicant with its application. HUD will approve the Final Work Plan and it will be incorporated into the Grant Documents.
- o. Fair Housing Requirements. Applicants must describe how they will address impediments to fair housing..
- p. Form HUD2990, certified by the designated official for the RC/EZ/EC if the applicant is applying for bonus points pursuant to the General Section.

3. 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: Applications must be submitted electronically, as prescribed in the General Section using the grants.gov website. Applicants must follow the instructions included in the General Section, unless granted a waiver for cause to the required electronic application requirement. The request for a waiver must provide a justification for cause in accordance with HUD's waiver policy of 24 CFR 5.1005.

Applicants must be eligible to acquire rights and access under HUD's Electronic Line of Credit Control System (eLOCCS). This is the sole mechanism for obtaining grant funds. Grantees are required to have HUD approval before making any withdrawal of grant funds from the eLOCCS system.

4. Describe efforts to identify duplication. The program is a pilot with new requirements for application submission, grant award, and reporting. It is anticipated that most items will only be required once for each applicant. The Work Plans, Letters of Intent, and Narrative Statements will be required once as part of the initial application, and again as finalized at the conclusion of negotiations with grant recipients.
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. The Department minimizes the burden on small businesses by requiring the collection of information in the application only once.
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. This is a new pilot program seeking innovative proposals for increasing the energy efficiency of Multifamily Housing. The application package uses standard OPM and HUD forms to the extent possible. No other existing forms can be substituted to obtain the required information for proposals included in the application. The collection of application and grant information occurs only once for each grant award. The Department could not comply with the provisions of the law and Federal regulations if the collection were eliminated.
7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5CFR 1320.8(d): There are no special circumstances that apply to this information collection.
8. 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. In accordance with 5 CFR 1320.8(d), this information collection soliciting public comments was announced in the *Federal Register* on June 2, 2011, Vol 76, No. 118 pages **35904**. No comments were received.

HUD has consulted extensively with persons outside the agency with regard to this pilot program. The following people, representing stakeholders from the multifamily industry, are among the non-governmental entities consulted:

Jeanne Engel, consultant, former Clinton Foundation and FHA  
David Abromowitz, Goulston and Storrs  
Tom Amdur, National Housing and Redevelopment Association  
Sharon Dworkin Bell, National Association of Homebuilders  
Lisa Blackwell, National Multi Housing Council  
Lane Burt, Natural Resources Defense Council  
Heather Clark, Winn Development  
Anne Evans, Center for Neighborhood Technologies

Jonathan Goldstein, Sunwheel Energy  
 Dick Jones, Boston Community Capital  
 Bill Kelly, Stewards of Affordable Housing for the Future  
 Mike Lappin, Community Preservation Corporation  
 Chuck Laven, Forsyth Street Advisors  
 Dan Mendelson, Consultant  
 Denise Muha, National Multi Housing Council  
 Jeff Perlman, Bright Power  
 Roger Platt, US Green Building Council  
 Jonathan Rose, Jonathan Rose Companies  
 Bruce Schlein, Citi  
 Julieann Summerford, Heschong Mahone Group  
 Paul Weech, Housing Partnership Network  
 Catherine Merschel, Build it Green  
 Kim Latimer, LIIF  
 Cary Hirschstein, HR&A Advisors, Inc.  
 Margot Brandenburg, Rockefeller Foundation  
 Kelly Caffarelli, Home Depot Foundation  
 Lois DeBacker, Kresge Foundation  
 Sam Marks, Deutsche Bank Americas Foundation  
 Debra Schwartz, Macarthur Foundation  
 John Wilson, Energy Foundation  
 Dana Bourland, Enterprise Community Partners

HUD has also consulted with other Federal governmental entities, among them the Treasury Department and the Environmental Protection Agency.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees. No gifts or payments are provided to respondents.
10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. The applicants have not been given any assurance of confidentiality beyond what is available under the OPM and HUD forms submitted as part of the application. The NOFA specifically states that, because the replicability of proposed solutions is a desired outcome of the Energy Innovation Program, HUD will not award grants to an applicant who proposes a proprietary solution. This prohibition on award includes proposing to use as a platform or create after development, a tool, system or methodology that is proprietary to the Grantee or any third party, or that relies on protected intellectual property. The use of widely available technical systems (e.g. ACCESS or EXCEL) is generally permitted..
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. No questions of a sensitive nature apply.
12. Provide estimates of the hour burden of the collection of information. **and** 13 Provide an estimate of the annual cost burden to respondents. Based on the assumption that clerical staff and professional/supervisory staff will share this burden. HUD estimates the applicable hourly rate will be \$25

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Abstract	20	1	20	2	40	\$ 50.00	\$ 1,000.00
Document list	20	1	20	1	20	\$ 25.00	\$ 500.00
SF424	20	1	20	1	20	\$ 25.00	\$ 500.00

SF424 Supplement	20	1	20	0.25	5	\$ 6.25	\$ 125.00
SFLLL	20	1	20	0.25	5	\$ 6.25	\$ 125.00
HUD2880	20	1	20	2	40	\$ 50.00	\$ 1,000.00
HUD424CB	27	1	27	3	81	\$ 75.00	\$ 2,025.00
Sources and Uses	20	1	20	1	20	\$ 25.00	\$ 500.00
HUD2993_	20	1	20	0.25	5	\$ 6.25	\$ 125.00
Letters of Intent	27	1	27	1.5	40.5	\$ 37.50	\$ 1,012.50
501c3 letter	20	1	20	0.25	5	\$ 6.25	\$ 125.00
consortium agreement	20	1	20	0.25	5	\$ 6.25	\$ 125.00
Narrative response	27	1	27	40	1080	\$1,000.00	\$ 27,000.00
Work Plan	27	1	27	25	675	\$ 625.00	\$ 16,875.00
Fair Housing Requirements	20	1	20	1	20	\$ 25.00	\$ 500.00
HUD2991	20	1	20	0.5	10	\$ 12.50	\$ 250.00
Cooperative Agreement	7	1	7	1	7	\$ 25.00	\$ 175.00
Monthly reports	7	12	84	2	168	\$ 50.00	\$ 4,200.00
Quarterly reports	7	4	28	6	168	\$ 150.00	\$ 4,200.00
Final report	7	1	7	4	28	\$ 100.00	\$ 700.00
Section 3 reporting	7	4	28	1	28	\$ 25.00	\$ 700.00
<b>Totals</b>	<b>383</b>	<b>38</b>	<b>502</b>	<b>93.25</b>	<b>2470.5</b>	<b>\$2,331.25</b>	<b>\$ 61,762.50</b>

**Forms SF 424, SF 424 Supp, SF LLL, HUD-2880, HUD-424CB, HUD-2993 and HUD-2990:**

It is estimated that there will be approximately 20 respondents who will submit the standard forms SF 424, SF 424 Supp, SF LLL, HUD-2880, HUD-424CB, HUD-2993 and HUD-2990 once at the application stage of processing. .

**All remaining application materials and exhibits:**

It is estimated that there will be approximately 20 respondents who will submit the remaining application materials once at the application stage of processing.

**Additional document submissions for grant recipients:**

An additional Letter of Intent will have to be submitted by approximately 5-7 applicants in order to finalize ranking of applications based on the number of grants HUD anticipates awarding due to the limited funding available for the pilot program.

**Reporting requirements:**

The estimated number of respondents is 5-7 based on the number of grants HUD anticipates awarding due to the limited funding available for the pilot program

14. Provide estimates of annualized costs to the Federal government. Costs are based on an hourly rate of \$50.41, representing the pay rate of a GS-14, step-1. There are no operational expenses.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Abstract	20	1	20	5	100	\$ 252.05	\$ 5,041.00
Document list	20	1	20	0.4	8	\$ 20.16	\$ 403.28
SF424	20	1	20	2.5	50	\$ 126.03	\$ 2,520.50
SF424 Supplement	20	1	20	0.1	2	\$ 5.04	\$ 100.82
SFLLL	20	1	20	0.1	2	\$ 5.04	\$ 100.82
HUD2880	20	1	20	0.2	4	\$ 10.08	\$ 201.64
HUD424CB	27	1	27	4	108	\$ 201.64	\$ 5,444.28
Sources and Uses	20	1	20	2.5	50	\$ 126.03	\$ 2,520.50
HUD2993_	20	1	20	0.1	2	\$ 5.04	\$ 100.82
Letters of Intent	27	1	27	10	270	\$ 504.10	\$ 13,610.70
501c3 letter consortium agreement	20	1	20	0.1	2	\$ 5.04	\$ 100.82
Narrative response	20	1	20	0.2	4	\$ 10.08	\$ 201.64
Work Plan	27	1	27	15	405	\$ 756.15	\$ 20,416.05
Fair Housing Requirements	27	1	27	15	405	\$ 756.15	\$ 20,416.05
Fair Housing Requirements	20	1	20	10	200	\$ 504.10	\$ 10,082.00
HUD2991	20	1	20	0.4	8	\$ 20.16	\$ 403.28
Cooperative Agreement	7	1	7	2	14	\$ 100.82	\$ 705.74
Monthly reports	7	12	84	4	336	\$ 201.64	\$ 16,937.76
Quarterly reports	7	4	28	15	420	\$ 756.15	\$ 21,172.20
Final report	7	1	7	15	105	\$ 756.15	\$ 5,293.05
Section 3 reporting	7	4	28	10	280	\$ 504.10	\$ 14,114.80
<b>Totals</b>	<b>383</b>	<b>38</b>	<b>502</b>	<b>111.6</b>	<b>2775</b>	<b>\$5,625.76</b>	<b>\$ 139,887.75</b>

15 Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I. This is a new collection.

16 For collections of information whose results will be published, outline plans for tabulation and publication. The results of this collection may be published if it is determined that data on the costs, benefits, challenges, and opportunities associated with retrofitting such properties will be useful to others and approaches for retrofitting such properties can be scaled up, applied more widely and adopted by other parties.

17 If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate. The OMB expiration dates will be displayed on the appropriate forms.

18 Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I. There are no exceptions to the Certification Statement identified in item 19 of the OMB 83-I.

**B. Collection of Information Employing Statistical Methods.**

This collection of information does not employ statistical methods.