

Supporting Statement for Paperwork Reduction Act Submissions

Title

OMB Control Number 2502-xxxx

(List of form numbers)

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. Include a statement regarding the changes for this submission. (Example: The changes for this submittal is as follows or the difference between this submission and the last is as follows....)

The 514 Tenant Education and Outreach Program (TEO) supports tenant capacity building at eligible existing Project-Based Rental Assistance (PBRA) properties. This information collection will be used to publish a Notice of Funding Opportunity (NOFO) to make available \$10 million to support tenant organizing activities at Project Based Rental Assistance (PBRA) properties. The NOFO will competitively award an intermediary organization with a grant that will be used to provide sub-awards and technical assistance to local tenant organizations, and the information collected will be used to select this grantee.

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 will be used by HUD staff to evaluate and score applications from potential intermediary organizations and select the grantee.

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 will permit the use of electronic submission of responses via Grants.gov. This will eliminate the burden and associated costs of printing and mailing their application to HUD.

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.

HUD has not conducted a NOFO competition to fund program activities under Section 514(f)

(3) of the Multifamily Assisted Housing Reform and Affordability Act of 1997 (MAHRAA) (42 U.S.C. USC 1437f note) since 2011, and the new program will have some different program requirements than previously funded activities. HUD needs this information in order to identify interested applicants and select the most qualified grantee to conduct the program activities.

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.

Small businesses and small non-profit organizations are eligible to apply. To minimize burden on applicants, only information needed by HUD to select the most qualified applicant is requested.

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.

If HUD is unable to collect the requested information, the Department will be unable to select a grantee to serve as the intermediary organization and the program will not be implemented. The result would be that \$10 million in crucially needed funding would not be available to support technical assistance and operational costs for local tenant organizations at PBRA properties. Tenant leaders at Project Based Rental Assistance (PBRA) properties across the United States have highlighted the importance of providing resources to established and emerging tenant organizations that advocate for the best interests of residents on issues related to property management, physical conditions, and preservation of affordable housing.

Tenant organizations educate residents about their rights and responsibilities and work with property management and other stakeholders on issues affecting residents' quality of life at privately-owned HUD-assisted multifamily properties. This includes providing information on a tenant's rights if an owner begins eviction proceedings, protections under the Fair Housing Act and other applicable civil rights laws, and resources on available services and supports. Tenant organizations also work with property owners on crucial matters related to management policies that affect tenancy and eviction policies.

The TEO program will support HUD's mission to provide decent, safe, sanitary, affordable housing. The TEO program seeks to improve the quality of housing provided through the PBRA program by empowering tenants to work collaboratively with property management and HUD staff to resolve issues related to their homes. The Tenant Education and Outreach (TEO) NOFO will provide a grant to an intermediary organization that will make sub-awards to tenant organizations and provide them with technical assistance and training throughout the period of performance. Currently, HUD provides no other funding for tenant advocacy efforts at PBRA properties.

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.

This NOFO will not be used to collect information more than once annually. Respondents will submit only one copy of requested documents. Applicants will not be required to retain any information in order to apply. The NOFO is not connected with any statistical survey, and will not require use of a statistical data classification. The NOFO does not include a pledge of confidentiality, nor does it require respondents to submit any proprietary or confidential information.

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

Respondents will not be provided any payment or gifts.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

All relevant regulations and HUD policies related to the Privacy Act of 1974 and the handling of Personally Identifiable Information (PII) apply to HUD's handling of PII collected through this NOFO.

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.

There are no questions of a sensitive nature that are commonly considered private.

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 in Item 13 of OMB Form 83-I.

* 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.

HUD estimates that approximately 10 applicants will submit applications in response to this NOFO in a given year. The information will be collected no more than once annually. HUD estimates that completing the application will take approximately 10 hours per applicant, based on the time it took HUD staff to create a mock application with the maximum number of pages in response to the draft NOFO. The estimated hourly cost to the applicant is \$44.41. The total estimated annual cost to the public is \$4,441 in years where a NOFO is published for the TEO program. Hourly estimate obtained from WLS.gov Occupational Employment & Wages (11-9141) X 1.319.

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden 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 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.

The only anticipated cost to the public are the costs outlined under item 12 and item 14.

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.

Information Collection	*Number of Respondents	Frequency of Response	Total Annual Responses	Burden Hours per Response	Total Annual Burden Hrs.	**Hourly Cost to Public	Total Annual Cost to Public	***Hourly Cost to Government	Total Annual Cost to Government
Tenant Education and Outreach (TEO) NOFO	10	1	10	10	100	\$44.41	\$4,441	\$45.27	\$6,790.5
Application for Federal Assistance (SF-424)	10	1	10	1	10	\$44.41	\$444	\$45.27	\$679
Budget Information Non-Construction Programs (SF-424A)	10	1	10	1	10	\$44.41	\$444	\$45.27	\$679
Applicant and Recipient Assurances and Certifications (HUD 424-B)	10	1	10	2	10	\$44.41	\$888	\$45.27	\$1,358
Applicant/Recipient Disclosure/Update Report (HUD 2880)	10	1	10	2	10	\$44.41	\$888	\$45.27	\$1,358
Disclosure of Lobbying Activities (SF-LLL)	10	1	10	.25	2.5	\$44.41	\$111	\$45.27	\$170
Certification Regarding Lobbying (Lobbying Form)	10	1	10	1	10	\$44.41	\$444	\$45.27	\$679
Capacity of the Applicant and Relevant Organizational Experience	10	1	10	10	100	\$44.41	\$4,441	\$45.27	\$6,790.5
Soundness of Approach Narratives	10	1	10	10	100	\$44.41	\$4,441	\$45.27	\$6,790.5
Affirmatively Furthering Fair	10	1	10	3	10	\$44.41	\$1,332	\$45.27	\$2,037

Housing									
Connection to Resources Narrative	10	1	10	5	10	\$44.41	\$2,220	\$45.27	\$3,395
Experience Promoting Racial Equity Narrative	10	1	10	5	10	\$44.41	\$2,220	\$45.27	\$3,395
Co-Applicant MOUs (if applicable)	10	1	10	1	10	\$44.41	\$444	\$45.27	\$679
Advancing Racial Equity Narrative	10	1	10	4	10	\$44.41	\$1,776	\$45.27	\$2,716
Total	140	14	140	55.25	402.5	\$44.41	\$24,534	\$45.27	\$30,726.00

* Number of respondents is based on the anticipated response to the NOFO.

**Hourly estimate is for staff time complete the NOFO application. Hourly estimate obtained from WLS.gov Occupational Employment & Wages (11-9141) X 1.319

*** GS Salary table 2022: estimated cost per hour for HUD staff (GS-12) to review and score each application X 1.383.

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 request to OMB for a new collection. As such, there are no program changes or adjustments.

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.

This collection of information will not be published.

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 is not requesting approval to avoid displaying the expiration date.

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 on form OMB 83-I, "Certification for Paperwork Reduction Act."

B. Collections of Information Employing Statistical Methods

This information collection does not employ statistical methods.

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked, "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

2. Describe the procedures for the collection of information including:

- * Statistical methodology for stratification and sample selection,
- * Estimation procedure,
- * Degree of accuracy needed for the purpose described in the justification,
- * Unusual problems requiring specialized sampling procedures, and
- * Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of test may be submitted for approval separately or in combination with the main collection of information.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.