

# Paperwork Reduction Act Submission

Please read the instruction before completing this form. For additional forms or assistance in completing this forms, contact your agency's Paperwork Reduction Officer. Send two copies of this form, the collection instrument to be reviewed, the Supporting Statement, and any additional documentation to: Office of Information and Regulatory Affairs, Office of Management and Budget, Docket Library, Room 10102, 725 Seventeenth St. NW, Washington, DC 20503.

1. Agency/Subagency Originating Request: <b>U.S. Department of Housing and Urban Development</b> Office of Community Planning and Development Office of Environment and Energy Environmental Review Division	2. OMB Control Number: a. <b>2506-0087</b> b. <input type="checkbox"/> None
--	--

3. Type of information collection: (check one) a. <input type="checkbox"/> New Collection b. <input type="checkbox"/> Revision of a currently approved collection c. <input type="checkbox"/> Extension of a currently approved collection d. <input type="checkbox"/> Reinstatement, <b>without change</b> , of previously approved collection for which approval has expired e. <input type="checkbox"/> Reinstatement, <b>with change</b> , of previously approved collection for which approval has expired f. <input type="checkbox"/> Existing collection in use without an OMB control number For b-f, note item A2 of Supporting Statement instructions.	4. Type of review requested: (check one) a. <input type="checkbox"/> Regular b. <input type="checkbox"/> Emergency - Approval requested by c. <input type="checkbox"/> Delegated 5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities? <input type="checkbox"/> Yes <input type="checkbox"/> No 6. Requested expiration date: a. <input type="checkbox"/> Three years form approval date      b. <input type="checkbox"/> Other (specify)
---	--

7. Title:  
**Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities**

8. Agency form number(s): (if applicable)  
 HUD-7015.15: Request for Release of Funds and Certification (RROF/C)

9. Keywords:  
 Housing, Grant Programs, Electronic Submissions, Waivers

10. Abstract:  
 The RROF/C is used to document compliance with the National Environmental Policy Act (NEPA) and the related environmental statutes, executive orders, and authorities in accordance with the procedures identified in 24 CFR Part 58. Recipients certify compliance and make request for release of funds. To the currently approved collection, the following procedures are added: (1) regulatory waivers of requirements of HUD environmental regulations; and (2) in lieu of hard copy, voluntary use of electronic submissions and notifications.

11. Affected public: (mark primary with "P" and all others that apply with "X") a. Individuals or households      e. Farms b. Business or other for-profit      f. Federal Government c. <b>X</b> Not-for-profit institutions      g. <b>P</b> State, Local or Tribal Government	12. Obligation to respond: (mark primary with "P" and all others that apply with "X") a. Voluntary b. <b>P</b> Required to obtain or retain benefits c. Mandatory
---	--

13. Annual reporting and recordkeeping hour burden: a. Number of respondents <b>18,791</b> b. Total annual responses <b>18,791</b> Percentage of these responses collected electronically <b>0%</b> c. Total annual hours requested <b>11,283</b> d. Current OMB inventory <b>11,271</b> e. Difference (+,-) <b>+12</b> f. Explanation of difference: 1. Program change: <b>+12</b> 2. Adjustment:	14. Annual reporting and recordkeeping cost burden: (in thousands of dollars) a. Total annualized capital/startup costs <b>\$0.00</b> b. Total annual costs (O&M) <b>0</b> c. Total annualized cost requested <b>0</b> d. Total annual cost requested <b>0</b> e. Current OMB inventory <b>0</b> f. Explanation of difference: 1. Program change: 2. Adjustment:
---	--

15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X") a. <b>X</b> Application for benefits      e. Program planning or management b. Program evaluation      f. Research c. General purpose statistics      g. <b>P</b> Regulatory or compliance d. Audit	16. Frequency of recordkeeping or reporting: (check all that apply) a. <input type="checkbox"/> Recordkeeping      b. <input type="checkbox"/> Third party disclosure b. <input type="checkbox"/> Reporting: 1. <input type="checkbox"/> On occasion      2. <input type="checkbox"/> Weekly      3. <input type="checkbox"/> Monthly 4. <input type="checkbox"/> Quarterly      5. <input type="checkbox"/> Semi-annually      6. <input type="checkbox"/> Annually 7. <input type="checkbox"/> Biennially      8. <input type="checkbox"/> Other (describe)
---	--

17. Statistical methods: Does this information collection employ statistical methods? <input type="checkbox"/> Yes <input type="checkbox"/> No	18. Agency contact: (person who can best answer questions regarding the content of this submission) Name: <b>Walter Prybyla</b> Phone: <b>(202) 402-4466</b> [ <a href="mailto:Walter.Prybyla@hud.gov">Walter.Prybyla@hud.gov</a> ]
--	---

---

---

---

## 19. Certification for Paperwork Reduction Act Submissions

On behalf of the U.S. Department of Housing and Urban Development, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9.

**Note:** The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320/8(b)(3). appear at the end of the instructions. The certification is to be made with reference to those regulatory provisions as set forth in the instructions.

The following is a summary of the topics, regarding the proposed collections of information, that the certification covers:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities;
- (d) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) It indicates the retention periods for recordkeeping requirements;
- (g) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
  - (i) Why the information is being collected;
  - (ii) Use of the information;
  - (iii) burden estimate;
  - (iv) Nature of response (voluntary, required for a benefit, or mandatory);
  - (v) Nature and extent of confidentiality; and
  - (vi) Need to display currently valid OMB control number;
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to collected (see note in item 19 of the instructions);
- (i) It uses effective and efficient statistical survey methodology; and
- (j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in item 18 of the Supporting Statement.

Signature of Program Official:  X Richard H. Broun, Director, Office of Environment and Energy	Date:
---	-------

Signature of Senior Officer or Designee:  X Lillian L. Deitzer, Departmental Reports Management Officer, Office of the Chief Information Officer	Date:
--	-------

# Supporting Statement for Paperwork Reduction Act Submissions

## 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 revision is a result of a proposed rule -- "Amendments to HUD Environmental Regulations" -- that would update HUD's environmental regulations to implement statutory changes and make environmental compliance easier. Currently, 24 CFR Part 58, "Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities" [copy attached] requires the submission of form HUD-7015.15--"Request for Release of Funds and Certification" [copy attached]. HUD recipients use this form to certify their compliance of proposed HUD-assisted activities with the National Environmental Policy Act (NEPA), the regulations of the Council on Environmental Quality, related federal environmental laws, executive orders, and authorities, and Part 58 procedures. HUD (or the State for certain State-administered HUD grant programs) approves the certification allowing for the conditionally awarded or formula-allocated funds to be released to the recipient. Various laws that authorize this procedure are listed in 24 CFR 58.1(b).

The currently approved information collection is revised to cover two new items: (1) requests for regulatory waivers of violations of HUD environmental regulations which should be submitted in a separate letter. HUD receives about 6 requests each year; and (2) in lieu of hard copy, the voluntary use of electronic submissions and notifications, including existing environmental forms (or narrative letters). In the current approved information collection, HUD made a commitment to issue proposed regulations that would permit electronic processing and administration of form HUD-7015.15. These two new items are contained in proposed "Amendments to HUD Environmental Regulations". This revision is also a request for OMB approval of a three year extension from the expiration date.

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.

As described above under #1, the respondents for this data collection are HUD recipients who are required to submit form HUD-7015.15. Recipients use the form to certify their compliance with statutory and regulatory requirements. Recipients must submit form HUD-7015.15 to HUD for approval (or to the State for certain State-administered funds for State approval). Without such approval of the recipient's certification of compliance with federal environmental laws and authorities, HUD funds cannot be released to the recipient. HUD proposes to revise its regulations to allow the voluntary use of electronic submissions and notifications that would apply to recipients choosing to use this option in lieu of the traditional submission of form HUD-7015.15 delivered in hard copy generally by postal service. Also, HUD proposes to revise its regulations, basically to codify current procedures, for HUD approval of regulatory waivers requested by recipients whose projects proposed for HUD funding are in violation of HUD environmental procedures.

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.

As described in above item #2, HUD proposed rule would permit recipients to electronically submit form HUD-7015.15 including request for regulatory waivers. This rulemaking will also permit HUD approvals of such electronic submissions to be made electronically by HUD staff. Currently, HUD recipients submit the form HUD 7015.15 in the original. The form is screen-fillable and is available on the HUD Environmental website. In addition, e-signaturing may be possible in the future as HUD makes progress in developing a departmental-wide system and protocol.

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.

This is not applicable, because there is no similar information already available.

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.

This collection of information does not impact small businesses and other small entities.

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 not applicable, because this collection of information is a one-time certification of compliance by the HUD recipient for a site-specific HUD-assisted project or activity.

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;
  - 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 than 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 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.

There are no special circumstances mentioned above that apply to this information collection.

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 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 preclude consultation in a specific situation. These circumstances should be explained.

A notice was been published in the *Federal Register* on 9/12/2007. No comments were received by HUD.

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

This is not applicable, because HUD does not provide any payment or gifts as remuneration for this information collection. The funds awarded are on the basis of a formula-allocation or a national competition, but fund recipients must certify compliance with statutory and regulatory requirements and receive HUD approval (or State approval as appropriate) for the release of funds for proposed projects and activities.

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

The respondent's form HUD-7015.15 submitted to HUD is a public document that must also be made available upon request to any member of the public, and therefore usage of the form by the respondent provides no assurance of confidentiality under HUD environmental review procedures.

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.

The use of form HUD-7015.15 does not involve questions of a sensitive nature such as described above.

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 Item 13 of OMB Form 83-I; 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.

Burden estimate (annualized):

Collection instrument	No. of respondents	Responses per respondent	Total responses	Hrs. per response	Total burden hrs.	Cost @ \$40 per hr.

Form HUD-7015.15	18,785	1	18,785	0.6	11,271	\$450,840
Waiver requests *	6	1	1	2	12	\$ 480
TOTAL	18,791	1	18,791		11,283	\$451,320

\* Waiver requests are submitted in a separate letter.

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 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 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.

This is not applicable for these reasons: (1) generally the above listed items do not apply to this information collection; and (2) maintaining a copy of form HUD 7015.15 as part of the recipient's environmental review record is a nominal part of project costs which are eligible for reimbursement under the HUD grant.

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 estimates of annualized cost to the Federal government is the same as that stated in Items 12 for HUD recipients, namely \$451,320, because this cost is considered a project expenditure chargeable to HUD grants.

15. Explain the reasons for any program changes or adjustments reported in Items 13 and 14 of the OMB Form 83-I.

This is a revision of a currently approved collection. The revision covers two new items: (1) request for regulatory waivers of violations of HUD environmental regulations which are submitted in separate letter and in lieu of hard copy the voluntary use of electronic submissions and notifications, including existing environmental forms. The collection revision increases the total burden by +12 hours.

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 subject information is no 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.

Not seeking approval to not display the expiration date.

18. Explain each exception to the certification statement identified in item 19.

No exceptions.

---

## B. Collections of Information Employing Statistical Methods

None.