

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION
Community Development Block Grant Recovery Program

A. Justification

1. This submission is to request to revise the currently approved emergency information collection for the reporting burden associated with information that Community Development Block Grant Recovery (CDBG-R). Grantees will report in the Integrated Disbursement and Information System (IDIS), the Recovery Act Management and Performance System (RAMPS), and on federalreporting.gov for CDBG-R-assisted activities, recordkeeping requirements, and reporting requirements, which will enable HUD to track program progress. This submission is limited to the reporting burden under the CDBG-R program, which is covered by OMB control number 2506-0184.

Need for the Information Collection

This request identifies the estimated reporting burden associated with information that CDBG-R grantees will report in IDIS, RAMPS, and on federalreporting.gov for CDBG-R-assisted activities, recordkeeping requirements, and reporting requirements. Grantees are encouraged to update their accomplishments in IDIS, RAMPS, and federalreporting.gov frequently and are required to report on a quarterly basis. In addition, grantees are required to retain records necessary to document compliance with statutory and regulatory requirements, Executive Orders, applicable OMB Circulars, and determinations required to be made by grantees as a determination of eligibility. The information required for any particular activity is generally based on the eligibility of the activity and which of the three national objectives (benefit low- and moderate-income persons; eliminate/prevent slums or blight; or meet an urgent need) the grantee has determined that the activity will address.

2. This request identifies the estimated reporting burden associated with additional information that CDBG-R grantees will report in IDIS, RAMPS, and on federalreporting.gov for CDBG-R-assisted activities. The information required for any particular activity is generally based on the eligibility of the activity and which of the three national objectives (benefit low- and moderate-income persons; eliminate/prevent slums or blight; or meet an urgent need) the grantee has determined that the activity will address. Grantees provide information in IDIS, RAMPS, and on federalreporting.gov that documents the outputs obtained from individual activities, and the performance measurement data will enable HUD to report on the outcomes that result from the use of CDBG-R funds.

The respondents are CDBG grantees that received CDBG grant funding in Fiscal Year 2008 in accordance with the principles of 42 U.S.C. 5306 (metropolitan cities, urban counties, Insular Areas, states, and nonentitlement counties in Hawaii). They are required to report on the CDBG-R-eligible activities they carry out (such as acquisition of real property, homeowner rehabilitation, clearance, public improvements, and public services) and how those activities met one of the three national objectives listed in Item 2. Grantees are required to report to HUD on these requirements 10 days after each calendar

quarter, beginning on July 10, 2009. Grantees are also required to make the information identified in paragraph 2 of item 1 above publicly available by posting it on a website.

3. IDIS is an electronic system that grantees use to report information to HUD on their use of regular CDBG funds, and to prepare and submit requests for drawdowns of funds from their lines of credit. IDIS has been modified to permit reporting on CDBG-R assisted activities separately from those assisted with regular CDBG funds. Grantees can input information about their CDBG-R-assisted activities, including accomplishments, into IDIS on an on-going basis throughout their program year. Grantees are required to report on their CDBG-R assisted activities on a quarterly basis, and this information must also be reported on grantees' websites. Grantees can generate reports from IDIS to more readily inform constituents of how CDBG-R funds are used, and HUD can easily access the information in IDIS for management and oversight purposes. Because this is a one-time allocation, it would not be feasible or economically sound to create an electronic system for this program.

RAMPS is an electronic system that will be used to manage information to demonstrate grantee compliance with the National Environmental Policy Act (NEPA) as required by Section 1609 of the Recovery Act. Grantees are required to enter environmental information for each CDBG-R activity in RAMPS on a quarterly basis.

Federalreporting.gov is a government-wide system that will be used to collect data on job creation and retention as required by Section 1512 of the Recovery Act. Grantees are required to enter job creation/retention information for each CDBG-R activity on federalreporting.gov on a quarterly basis.

4. Some of the information (such as job/creation retention, environmental review) that will be entered into IDIS may also be entered into RAMPS and on federalreporting.gov.
5. Not applicable because no small entities are impacted as State and local governments are not considered small entities.
6. If no records are collected on this aspect of the program, program performance/regulatory compliance will not be able to be determined. The American Recovery and Reinvestment Act precludes a less frequent information collection. More importantly, the information being collected is the minimum necessary to implement the statute and achieve its stated purposes and objective. Section 1512 of the Recovery Act requires that not later than 10 days after the end of each calendar quarter, each recipient that received recovery funds from a federal agency shall submit a report to that agency that contains: (1) the total amount of recovery funds received from that agency; (2) the amount of recovery funds received that were expended or obligated to projects or activities; and (3) a detailed list of all projects or activities for which recovery funds were expended or obligated, including the name of the project or activity; a description of the project or activity; an evaluation of the completion status of the project or activity; an estimate of the number of jobs created and the number of jobs retained by the project or activity; and for infrastructure investments made by State and local governments, the purpose, total cost, and rationale of the agency for funding the infrastructure investment with funds made available under the Recovery Act and name of

the person to contact at the agency if there are concerns with the infrastructure investment. Not later than 30 calendar days after the end of each calendar quarter, each agency that made Recovery Act funds available to any recipient shall make the information in reports submitted publicly available by posting the information on a website. Grantees' agreements with subrecipients or units of general local government must contain a special contract condition requiring them to comply with the reporting requirements established for CDBG-R funding.

7. This information is being collected in a manner consistent with the guidelines in 5 CFR 1320.6.
8. HUD published a notice describing the Paperwork Reduction Act Submission in the Federal Register on August 14, 2009, for 60 days, and no comments were received. .
9. No payment or gift to respond is allowed.
10. Reports on the expenditure of CDBG-R funds must be made available to the public via www.hud.gov/recovery and grantees' websites; therefore, no assurances of confidentiality are offered. Sensitive, individual-level information is not disclosed in these reports.
11. The information does not include any question of a sensitive nature, such as sexual orientation and attitudes, religious beliefs, and other matters that are commonly considered private.
12. A representative from each of the 1,196 eligible respondents will be required to report quarterly on their expenditure of CDBG-R funds. The estimated hour burden is 153,088

According to the Recovery Act, CDBG-R allocations are based on the formula used by the regular CDBG program. Using this formula resulted in a total of 1,196 grantees (metropolitan cities, urban counties, states, non-entitlement counties in Hawaii, and Insular Areas) that are eligible to receive CDBG-R funds.

Estimates of public burden have been derived through program staff experience, and are shown in the table below:

Submission Documents	Number of Respondents	Responses Per Year	Total Annual Responses	Hrs per Response	Total Hours
Reporting Requirements American Recovery and Reinvestment Act	1,196	4	4,784	32	153,088

Respondents' average annualized cost: $\$21 \times 4,784 = \$100,464.00$

13. There are no additional costs to respondents.

14. Estimates of annualized costs to the Federal government (clerical and professional staff time):

Review each quarterly report ($\$34.30 \text{ per hr.} \times 1 \text{ hr.} \times 1,196$) = \$41,023.

15. This is a revision of the new collection that was submitted to OMB for emergency processing that was approved by OMB on April 17, 2009, and expires on October 31, 2009. This submission includes recordkeeping and quarterly reporting only. The application portion and associated forms are no longer necessary.

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

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

18. No exceptions.