**Supporting Statement for Paperwork Reduction Act Submissions**

**A. Justification**

1. Why is this 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/authorizing the collection of information.

The Line of Credit Control System (LOCCS) is HUD’s computerized cash management and disbursement system developed to assist the Chief Financial Officer (CFO) in planning, accounting, and evaluating HUD disbursements within specific grant funded programs, including Public and Indian housing programs. LOCCS is HUD’s primary vehicle for achieving cash management savings through the use of electronic wire-transfer of payments to grant recipients of HUD program funds. This ensures that payments are made in a timely manner, but not in excess of the grant recipient’s cash needs. By responding quickly to a grantee’s payment needs, grantees will not request funds in excess, or advance, of their required program outlays.

The Voice Response System (VRS) allows the grant recipient to requisition grant funds via a touch-tone telephone. The VRS uses a text-to-speech synthesizer to prompt the grantee for data such as User ID, Password, Voucher Number, Grant Number, Budget Line Item Code(s), and Amount Requested. Requisitions made through VRS are automatically entered into LOCCS, thereby eliminating the requirement for voucher submission and data entry by Program/Field Office personnel in order to release funds to the grant recipient. At the end of the phone request, the recipient knows whether LOCCS will automatically pay the request, deny the request, or require HUD Program/Field Office staff to approve/reject the payment request.

The applicable Form HUD-50080 will be prepared by the grantee before calling LOCCS/VRS with the drawdown request, and will be used as a prompt for entering the information through the touch-tone pad and for confirming information that is spoken back by the VRS simulated voice.

2. How is this information to be used?

The grant recipients fill in the voucher form with the information needed to request a drawdown of grant funds. Each PIH program area makes available a voucher request form pre-printed with the standard program-specific information needed to make a drawdown of funds for that program. Although the primary function of the voucher request form is to facilitate the VRS grant drawdown process, the forms also serve as an internal control feature – providing the grantee with a hardcopy record of the HUD advances made to a particular program, and serving as a historical record of the specific budget line item for which the grantee has requested funds.

1. Describe whether, and to what extent, the collection of information is automated (item 13b1 of OMB form 83-i). Also describe any consideration of using information technology to reduce burden.

The LOCCS/VRS is an automated system, which includes the latest technology and provides the grantee with a fast, reliable method to request/obtain grant funds.

1. Is this information collected elsewhere? If so, why cannot any similar information already available be used or modified.

There will be no duplication of information. There is no similar information already available, which could be used or modified for this purpose.

5. Does the collection of information impact small businesses or other small entities (item 5 of OMB form 83-i)? Describe any methods used to minimize burden.

We have minimized the burden on small public and Indian housing agencies by automating the voucher request form.

1. 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 information is provided by the grantees prior to drawdown of grant funds. If this information were not provided, grantees could not access the VRS and obtain grant funds to implement various programs for which Congress has appropriated Federal dollars.

7.Explain any special circumstances requiring:

1. respondents to report information more than quarterly;
2. a written response in fewer than 30;
3. more than an original and two copies of any document;
4. respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
5. a statistical survey not designed to produce results than can be generalized to the universe of study;
6. the use of a statistical data classification that has not been reviewed and approved by OMB;
7. 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
8. respondents to submit proprietary trade secret, or other confidential information. Special circumstances that require the collection of information in a manner inconsistent with the guidelines in 5 CFR 1320.6 are:

The frequency of the requests is at the option of the grantee. The VRS will accept a request for funds from a grantee on a daily basis. A recipient using good cash management practices will request funds close to the payment date for their bills. Therefore, the frequency of request will depend upon the type of program being administered.

1. Identify the date and page number of the *Federal Register* notice (and provide a copy) soliciting comments on the information. Summarize public comments and describe actions taken by the agency in response to these comments. Describe all efforts to consult with persons outside the agency to obtain their views.

HUD published a Federal Register Notice, Volume 75, Page 41509, on July 16, 2010, which allowed the public a 60-day comment period on this information collection. The comment period ended September 17, 2010. No public comments were received.

1. Explain any payments or gifts to respondents, other than remuneration of contractors or grantees.

No decisions were made to provide any payment or gifts to respondents.

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

No assurances of confidentiality are provided.

1. Justify any questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private.

No sensitive questions are asked.

12. Estimate public burden: number of respondents, frequency of response, annual hour burden. Read the complete instructions on the form 83i. Explain how the burden was estimated. Generally estimates should not include burden hours for customary and usual business practices;

1. if this collection uses more than one form, provide separate estimates for each form and aggregate the hour burdens in item 13 of OMB Form 83i; and
2. 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.

Estimated reporting burdens:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Grant Program | Form  50080-XXXX | Number of Respondents\* | Frequency of Responses (drawdowns annually per program) | Hours Per Response | Burden Hours |
| Capital Fund | 50080-CFP |  | 56,876 | .15 | 8,531.4 |
| Resident Opportunities and Supportive Services (ROSS) | 50080- NN, RSDE, RSDF, SC |  | 8,400 | .15 | 1,260 |
| Public Housing Technical Assistance | 50080-PHTA |  | 134 | .15 | 20.1 |
| Hope VI | 50080-URP |  | 46 | .15 | 6.9 |
| Family Self-Sufficiency | 50080-FSS |  | 0 | .15 | 0 |
| Indian Housing Block Grant | 50080-IHBG |  | 7,290 | .15 | 1,093.5 |
| Indian HOME | 50080-HOMI |  | 10 | .15 | 1.5 |
| Traditional Indian Housing Development | 50080-TIHD |  | 510 | .15 | 76.5 |
|  |  | **4,746** | **73,266** |  | **10,990** |

\* The total number of respondents for all forms included in this collection is 4,746. This represents the number of PHAs, tribes, TDHEs (tribally designated housing entities), non-profit organizations and other non-PHA entities receiving funds under Office of Public and Indian Housing programs and accounts for PHA consolidations. Many of these respondents are represented in multiple program categories and have multiple grants within each program area.

Estimated annual cost to respondents is $370,241, based on financial or administrative staff spending nine minutes for each payment voucher for all programs at an administrative, fully loaded hourly rate of $21.63 for the total of 17,117 burden hours associated with this collection.

13. Estimate of the annual cost to respondents or recordkeepers (do not include the cost of hour burden shown in Items 12 and 14). Read the complete instructions on the form 83i.

No additional costs for respondents.

14. Estimate annualized costs to the Federal government.

There are no estimated annualized costs provided for the Federal government. Collection of this information is part of normal operations associated with disbursement, management, and accounting of federal funds.

15 . Explain any program changes or adjustments reported in items 13 and 14 of the OMB Form 83i.

This information collection was revised to remove several obsolete forms that are no longer required. Forms 50080-MTW, AP, C, CB-CR, CBG, HSS, RMBD, RSDM, YAP, and UYC are obsolete and does note need to be continued. These forms are no longer necessary.

The adjustments are reflected in the accurate assessment of current program activity.

16. If the information will be published, outline plans for tabulation and publication.

This information will not be published.

17. Explain any request to not display the expiration date.

No request is made not to display the expiration date.

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

There are no exceptions to the certification statement in item 19.

# B. Collections of Information Employing Statistical Methods