
19. Certification for Paperwork Reduction Act Submissions

On behalf of this Federal Agency, 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 be 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

Date:

Signature of Senior Officer or Designee:

X
Leroy McKinney, Departmental Paperwork Reduction Act Officer
Office of the Chief Information Officer

Date:

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification

Introduction

This submission is to request a revision of a currently approved information collection, for the reporting burden associated with information that State Community Development Block Grant (CDBG) grantees will report in the Integrated Disbursement and Information System (IDIS) for CDBG-assisted activities, recordkeeping requirements, and reporting requirements, which will enable HUD to track program progress. This revision will incorporate the additional reporting burden for grantees to report on distribution of grant funds within regulatory requirements for timeliness. The reporting burden will increase by 80 hours of the original burden under the State CDBG program, which is covered by OMB control number 2506-0085.

1. Need for the Information Collection

This request identifies the estimated reporting burden associated with information that CDBG state grantees will report in IDIS for CDBG-assisted activities, recordkeeping requirements, and reporting requirements. Grantees are encouraged to update their accomplishments in IDIS 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. Grantees are required to prepare and submit their Consolidated Annual Performance and Evaluation Reports, which demonstrate the progress grantees make in carrying out CDBG-assisted activities listed in their consolidated plans. This report is due to HUD 90 days after the end of the grantee's program year. 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. HUD is required by statute to determine on an annual basis that states have distributed funds to their units of general local government in a timely manner.

The statutory and regulatory provisions that govern the record keeping and reporting requirements for the CDBG state program are:

- 24 CFR 570.490(a) requires the retention of 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 condition of eligibility.
- 24 CFR 570.491 requires that each grantee shall submit performance and evaluation report in accordance with 24 CFR part 91, and 24 CFR 91.520 requires each grantee that has an approved consolidated plan to annually report, in a form prescribed by HUD, on the progress that it has made in carrying out its consolidated plan (which includes activities carried out under the CDBG entitlement program). The report is submitted to HUD within 90 days after the end of the grantee's program year. State grantees are required by Section 104(e) of the Housing and Community Development Act of 1974, as amended (HCDA), to submit a performance report, which is necessary for the Secretary to perform an annual review of performance, as required by that section of the law, as well as provide information necessary for HUD to report on the results of the use of funds awarded under the CDBG program. Grantees are required to input accomplishment data at least annually to comply with this annual reporting requirement, but they are also strongly encouraged to update data on accomplishments in IDIS on a quarterly basis.
- 24 CFR 570.494 requires that each grantee must meet the requirement for the timely distribution of State CDBG funds to units of general local government under their jurisdiction. The grantee must obligate and announce all of its grant to units of general local government within 15 months of the state signing its grant agreement with HUD. Recaptured funds and program income received by the state must be expeditiously expended obligated and announced to units of general local government. HUD may collect information from states to determine timely distribution.
- Section 104(e)(2) of HCDA requires HUD to perform an annual review to determine if the state grantee is distributing CDBG funds to its units of general local government in a timely manner.

2. How the information is or will be used:

This request identifies the estimated reporting burden associated with information that CDBG state grantees will report in IDIS for CDBG-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 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 funds. The revision to collect information from grantees regarding the distribution of their grant will enable HUD to determine whether grantees are distributing CDBG funds in a timely manner.

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.

IDIS is an electronic system that grantees use to report information to HUD on their use of CDBG funds, and to prepare and submit requests for drawdowns of funds from their lines of credit. Ninety percent of the reporting is generated from IDIS, ten percent from hard copy documents. Grantees can input information about their CDBG-assisted activities, including accomplishments, into IDIS on an on-going basis throughout their program year. The use of IDIS eliminates duplication of information and reduces inconsistent reporting. Grantees can generate reports from IDIS to more readily inform constituents of how CDBG funds are used, and HUD can easily access the information in IDIS for management and oversight purposes.

4. Describe efforts to identify duplication.

No duplication of effort is caused by this information collection request.

5. Impact on small businesses or other small entities.

No impact on small businesses or other small entities. CDBG state grantees provide assistance to units of general local government to carry out eligible activities. Those local governments are required to provide the grantee with the information the grantee needs to document the compliance of the activity with program requirements and to allow the grantee to report the use of funds in IDIS

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

If no records are collected on this aspect of the program, program performance/regulatory compliance will not be able to be determined. Title I 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.

State grantees are required by Section 104(e) of the HCDA to submit a performance report, which is necessary for the Secretary to perform an annual review of performance required by that section of the law, as well as providing the information to Congress, upon request. Section 104(e)(2) requires that the Secretary review whether the states have distributed CDBG funds to units of general local government in a timely manner. Failure to make such determination may result in unnecessary delays in putting appropriated funds to use as intended by Congress.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner (eight items listed that would impose additional workload burden on recipients).

There are no special circumstances that would cause this information collection to be conducted in a manner that would impose one or more of the additional requirements identified under this item.

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).

HUD published a notice describing the Paperwork Reduction Act Submission in the Federal Register on August 26, 2010, for 60 days. Additionally, a 30 day federal register notice was published on Wednesday, December 1, 2010.

9. Explain any decision to provide any payment or gift to respondents and the basis for the assurance in statute, regulation, or agency policy.

No payment or gifts are provided to any respondents for any information.

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

24 CFR 570.490(c)(2) of the CDBG regulations states that grantees shall provide citizens with reasonable access to records regarding the past use of CDBG funds, consistent with applicable State and local laws regarding privacy and obligations of confidentiality.

11. Provide additional justification for any questions of a sensitive nature.

The information collection request does not include any sensitive questions.

12. Provide estimates of the hour burden of the collection of information.

TASK	No. of Respondents	Frequency of Response (Annual)	Burden Hours per response	Total U.S. Burden Hours
Current Inventory:				
PER (Performance & Evaluation Report/IDIS)	50	1	237	11,850
Recordkeeping:				
States	50	on-going	176	8,800
Localities	3,500		26.13	91,455
Timely Distribution Form:				
States	50	1	1.5	75
TOTAL	50 plus			112,180

Description of estimation methodology:

Because of the differences between CDBG state grantees; their variations in population size and needs; the wide range of funding allocations; and the wide range of activities that may be assisted under the CDBG program, a determination was made to identify the average number of activities per year, per grantee, and use that as the basis for identifying recordkeeping and reporting burdens associated with this data collection.

13. Estimate for total annual cost burden to respondents (other than hours)

No other costs than stated in #12 above.

14. Estimates of annualized cost to the Federal Government.

(16 hours on average, to review each annual report plus 30 minutes to review each timeliness distribution form)
 $50 \times 16.5 \text{ hours} \times \$32.70^{**}(\text{per hour}) = \$26,977.$

** GS 12, step 5 (2010 OPM tables)

15. Reasons for program changes or adjustments reported in items 13 or 14

To ensure that grantees are meeting the requirement for timely distribution of State CDBG funds to their units of general local government, the grantee must submit form 40108 which will increase the burden hours by 80 hours. No program changes are being reported.

16. The information collected is not for statistical use nor does its collection use statistical methods, however, the information is provided to Congress, upon request.

17. HUD is not seeking approval to not display the expiration date for OMB approval of the information collection.

18. There are no exceptions to the signed certification.