
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 Charles Bien, Acting Director, Office of Environment and Energy	Date:
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Signature of Senior Officer or Designee: X Office of the Chief Information Officer	Date:
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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.

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) approve 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). This revision adds a new certification, number 3 in part 2, to explicitly call out the stated requirement to foster better compliance.

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 respondents are HUD recipients who are required to submit form HUD-7015.15. The purpose of the information collection is to document statutory and regulatory compliance by HUD recipients on form HUD-7015.15, which is submitted to HUD (or the State for certain State-administered funds) for approval for funds to be released to the recipient.

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 may propose rulemaking that would permit recipients to electronically submit form HUD-7015.15 including allowing the use of electronic signatures on the form. 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. The submission of the form electronically with electronic signatures may be possible in the future as HUD makes progress in developing a departmental-wide system and protocol that would permit electronic submissions of environmental certifications made by HUD recipients.

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.

Notice of Proposed Information Collection for public comment was published in the Federal Register on January 27, 2011 (76 FR 4933) [copy attached]. 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.

Estimates (annualized hours burden) are 18,785 respondents, 1 frequency of response, 0.6 hours per response = 11,271 hours. Estimates (annualized costs) are \$338,130 = \$ 30 per hour x 11,271 hours. The recipient's costs are eligible project costs chargeable to the HUD grant. This is the same information that was provided in 2001 and is still current.

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. This is the same information that was provided in 2001 and is still current.

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 \$415,800, because this cost is considered a project expenditure chargeable to HUD grants. This is the same information that was provided in 2001 and is still current.

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

There are no changes or adjustments.

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.

Not applicable.

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 applicable.

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

Not applicable.

B. Collections of Information Employing Statistical Methods

This is not applicable.

Attachments to Form OMB 83-I:

For item #1: Legal and Administrative Requirements:

a. Revised Form HUD-7015.15, "Request for Release of Funds and Certification."

b. 24 CFR Part 58, "Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities," e-CFR Data is current as of August 18, 2011

<http://edocket.access.gpo.gov/2011/pdf/2011-1803.pdf>

For item #8: Federal Register

a. Notice of Proposed Information Collection: Comment request (76 FR 4933) January 27, 2011.