

## 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> <b>Office of the Deputy Assistant Secretary for Economic Development</b>		2. OMB Control Number: a. <b>2506-0153</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 checked="" 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 checked="" 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 checked="" type="checkbox"/> No 6. Requested expiration date: a. <input checked="" type="checkbox"/> Three years from approval date      b. <input type="checkbox"/> Other (specify)	
Title: <b>Brownfields Economic Development initiative (BEDI)</b>			
8. Agency form number(s): (if applicable)  HUD 40123, Brownfields Economic Development Application; SF-LLL- Disclosure of Lobbying Activities SF-424- Application for Federal Assistance; SF-424 Sup- Survey for Ensuring Equal Opportunities; HUD-40122- State Certifications Related to Nonentitlement; HUD-96010- Logic Model; HUD-2880- Applicant/Recipient Disclosure Update Report; HUD-2991-Certification of Consistency with Consolidated Plan; SF 1199A- Direct Deposit Sign Up Form; HUD 27054 LOCCS Voice Response System Access Authorization HUD 27054A- LOCCS Access Authorization Security Form; SF 425-A- Federal Financial Report; HUD 27061- Racial & Ethnic Data Reporting Form; HUD 60002- Economic Opportunity for Low & Very Low-Income Persons In Connection with Assisted Projects; Federal Funding Accountability & Transparency Act (FFATA) Subrecipient Reporting; Federal Awardee Performance & Integrity Info. System Reporting (FAPIS); Consolidated Annual Performance Evaluation Report (CAPER) January 13, 2011, Vol. 76			
9. Keywords: Economic development, grants, brownfields			
10. Abstract: BEDI is designed to help local governments redevelop brownfields, defined in the NOFA as abandoned, idled, or underutilized real property, including industrial and commercial facilities, where expansion or redevelopment is complicated by the presence or potential presence of environmental contamination.			
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. Not-for-profit institutions      g. <input checked="" type="checkbox"/> State, Local or Tribal Government		12. Obligation to respond: (mark primary with "P" and all others that apply with "X") a. Voluntary b. <input checked="" type="checkbox"/> Required to obtain or retain benefits c. Mandatory	
13. Annual reporting and recordkeeping hour burden: a. Number of respondents      38 b. Total annual responses      38 Percentage of these responses collected electronically      100% c. Total annual hours requested      1,260 d. Current OMB inventory      2,000 e. Difference (+,-)      -740 f. Explanation of difference: A decrease in the number of applicants/grantees. 1. Program change: 2. Adjustment:		14. Annual reporting and recordkeeping cost burden: (in thousands of dollars) a. Total annualized capital/startup costs      \$0.00 b. Total annual costs (O&M) c. Total annualized cost requested      \$0.00 d. Total annual cost requested e. Current OMB inventory 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. <input checked="" type="checkbox"/> Application for benefits      e. <input checked="" type="checkbox"/> Program planning or management b. Program evaluation      f. Research c. General purpose statistics      g. Regulatory or compliance d. Audit		16. Frequency of recordkeeping or reporting: (check all that apply) a. <input checked="" type="checkbox"/> Recordkeeping      b. <input type="checkbox"/> Third party disclosure c. <input checked="" type="checkbox"/> Reporting: 1. <input checked="" type="checkbox"/> On occasion      2. <input type="checkbox"/> Weekly      3. <input type="checkbox"/> Monthly 4. <input type="checkbox"/> Quarterly      5. <input checked="" type="checkbox"/> Semi-annually      6. <input checked="" 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 checked="" type="checkbox"/> No		18. Agency contact: (person who can best answer questions regarding the content of this submission) Name: Nikki Bowser Phone: 202-402-4395	

## 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 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:

Date:

*Robert Duncan*  
X Associate DAS for Economic Development

*12/30/2010*

Signature of Senior Officer or Designee:

Date:

Colette Pollard, Departmental Reports Management Officer  
Office of Investment Strategies, Policy, and Management, Office of the Chief Information Officer

## 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.

ANSWER: Information is gathered to demonstrate the quality of the proposed project or activities, and the applicant's capacity and commitment to use the BEDI funds in accordance with the purposes of the Section 108(q), Title I of the Housing and Community Development Act of 1974.

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.

ANSWER: First, the information collected through the annual one-time application is essential so that HUD staff may determine the eligibility, qualification, and capability of applicants to implement HUD's Brownfields Economic Development Initiative (BEDI) program purpose. The BEDI program collects information from eligible units of local government referred to as entitlement and non entitlement communities. Information is used to score and rank all incoming eligible applications to determine which applicants will receive BEDI funding.

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.

ANSWER: All applicants are required to submit applications via grants.gov.

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.

ANSWER: Each funded application is funded under a new appropriation act. Information collected is unique to that program year. Reviewers will only consider information submitted for the current year's competition. Electronic letter of credit information is only submitted once and government wide data is only submitted as required (example- Sec 3, FAPIIS and FFATA).

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1) describe any methods used to minimize burden.

ANSWER: The collection of information does not impact small businesses or other small entities. Only the applicant is required to submit information on behalf of third party partners.

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.

ANSWER: Without the application information collection, reviewers would not be able to evaluate the capacity and commitment to carry out BEDI activities and make funding decisions. Post award information is required by law to be collected. Program specific post award information is governed by 42USC53304(e). Under the HUD Reform Act, discretionary funds must be awarded on a competitive basis. Without collecting this information funds could not be awarded.

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 on a semi- annual basis;
- 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;

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- 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.

ANSWER: There are no special circumstances that require information collection to be conducted in the manner listed in 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), 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.

ANSWER: The Notice hasn't been published at this time.

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

ANSWER: Information collections does not involve any payment or gifts to respondents other than to grants to grantees.

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

ANSWER: No confidentiality is promised.

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.

ANSWER: No requests are made for information of a sensitive nature.

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.
- ANSWER: See table below:

<u>Submissions</u>	<u># of Responses</u>	<u>Annual Burden Hours</u>	<u>Total</u>	<u>Annualized Cost @ \$8/hour</u>
Applicants	25	40	1,000	\$8,000
Grantees	13	20	260	\$2,080
Total	38			\$10,080

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

Signature of Senior Officer or Designee:

Date:

Colette Pollard, Departmental Reports Management Officer  
Office of Investment Strategies, Policy, and Management, Office of the Chief Information Officer

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.

ANSWER: There are no additional costs other than those shown in #12.

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.

ANSWER: Annualized Cost to Federal Government- Grant Administration

See Table Below:

Submissions	# of Responses	Annual Burden Hours	Total	Annualized Cost @ \$36/hour
Applicants	25	40	1,000	\$36,000
Grantees	13	20	260	\$9,360
Total	38			\$45,360

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

ANSWER: There has been a decrease in the number of applicants and grantees.

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.

ANSWER: Only the awarded applicants anticipated project outcomes will be published on BEDI website

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.

ANSWER: Expiration date for OMB approval will be displayed.

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

ANSWER: There are no exceptions to the certification statement.

**B. Collections of Information Employing Statistical Methods**

ANSWER: None

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