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## 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.

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Signature of Program Official:

X

Date:

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Signature of Senior Officer or Designee:

X  
Wayne Eddins, Departmental Reports Management Officer,  
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.

Title I of the Housing and Community Development Act of 1974, as amended, established the Community Development Block Grant (CDBG) Program. The Program has two components – an entitlement component for metropolitan cities and urban counties and a non-entitlement component for small cities and rural areas. The Omnibus Budget Reconciliation Act of 1981 gave states the opportunity to assume administration of the entitlement component.

Previously to Fiscal Year 2000, 49 states (including Puerto Rico) administered the nonentitlement, or State, CDBG program. The State of New York assumed administration of its State CDBG program in Fiscal Year 2000, leaving only the State of Hawaii administered by HUD. HUD is statutorily required to administer the nonentitlement component (commonly known as the “Small Cities Program”) in any state which does not assume administration of the program. However, if any of the states currently administering the State CDBG program should decide not to administer the program, the allocation for that state would be equally divided among the remaining states.

A reinstatement, with change, of previously approved information collection for which approval has expired, is requested for the annual performance assessment report submitted by the grantees in the Small Cities program enabling HUD to track program progress. Approximately 40 localities remain under the jurisdiction of the HUD-administered program (those funded prior to New York’s takeover of its Small Cities program). Since each of the localities have completed the expenditure of their original HUD grant, all of the Small Cities Programs are being funded with a Program Income.

Because the state administers the non-entitlement CDBG funding in New York, HUD does not accept applications for annual funding competitions.

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.

HUD Form 4052 is the Performance Assessment Report (PAR) which grant recipients are required to submit on an annual basis to report on program progress. HUD is statutorily required to monitor program participants for timely program progress and failure to have an approved reporting format would hamper HUD’s ability to carry out this responsibility. The 3 Small Cities program grantees in Hawaii are required to follow the reporting requirements from the CDBG Entitlement program and are covered by the OMB approval (2506-0077) for that program.

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.

There are currently no information collection technologies uniformly available which would reduce the reporting burden on all affected units of general local government. The information collection requirements have been reduced to the minimum necessary to meet statutory requirements. The program phased out in 2006 and so automating the form is not beneficial at this point.

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.

No duplication of effort is caused by this information collection request since this is the only reporting method that exists for the small cities program.

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.

Small businesses nor other small entities are impacted by this information collection request.

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.

The information to be collected under this request is not available through any other source and is the only method of reporting for this information. Without this report HUD could not track the program for program and financial compliance.

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.

HUD is statutorily required to collect information necessary to evaluate program progress and compliance and there are no special circumstances.

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.

This information collection request is not inconsistent with 5 CFR 1320.6. HUD Field Offices dealing with affected units of general local government have not been advised of any problems or controversy regarding the use of these forms or the collection of information. This notice was published in Federal Register on November 22, 2011, Volume 76 , page 72211 for 60 days .

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

No payment or gifts were provided to respondents.

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

The information collected under this request does not include information on individuals. No assurances of confidentiality have been given.

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 information collection request does not include any sensitive questions.

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.

Estimated burden of collection:

Form 4052	No. of Respondents	Frequency of Response	Hours per Response	Total Hours	Cost per Hour	Total Cost
	40	1	4	160	\$31.00	\$4,960

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.

There are no additional costs to the respondent.

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.

Annualized Cost to the Federal Government:

No. of Responses	Hours per Response	Total Hours	Cost per hour	Total Cost
40	2	80	\$31.94	\$2,555.20

15. Explain the reasons for any program changes or adjustments reported in Items 13 and 14 of the OMB Form 83-I.
- \*\*This is a request for an extension of a currently approved collection. The decrease in the number of applicants reflects that the program has phased out and most grants have closed under the HUD-Administered CDBG Program. The number of respondents using Form 4052 is based on the most current information available on the number of open/active grants. Most grants are completed and closed out, the number of respondents has decreased. Since there are so few active grants and respondents only have to report on program income the number has decreased.**

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.

The information collected is not for statistical use nor does its collection use statistical methods and will not be published.

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.

We are not seeking approval to not display the expiration date for OMB.

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

There are no exceptions to the signed certification

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