
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 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:

X

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.

This request for OMB approval seeks clearance for information collections related to HUD's "Loan Guarantee Recovery Fund," a rule that implements Section 4 of the "Church Arson Prevention Act of 1996" (Pub. L. 104-155, approved July 3, 1996) (the Act) at 24 CFR part 573. Section 4 of the Act authorizes the Secretary of HUD to guarantee loans made by financial institutions to assist certain nonprofit organizations (organizations described in Section 501 c (3) of the Internal Revenue Code of 1996) that have had property damaged as a result of acts of arson, or terrorism.

The circumstances that make the information collection necessary:

Financial Institution Reporting

Financial institution reports are needed for the purpose of monitoring repayment activity of loans covered by HUD's Church Arson Loan Guarantee program. These institutions report the following information on a monthly basis: 1) amount of monthly payment made by borrower, 2) interest paid, 3) remaining principal, and 4) current balance.

Financial Institutions Recordkeeping

Financial records are required to be kept and maintained for the duration of the loan. Records pertaining to the loans made by financial institutions shall be held for the life of the loan guarantee. A lender with a Section 4 Guaranteed Loan shall allow HUD, the Comptroller General of the United States, and their authorized representative access from time to time to any documents, papers, or files which are pertinent to the guaranteed loan, and to inspect and make copies of such records which relate to any Section 4 Loan. Examples of records include Loan Guarantee application, copy of promissory notes, loan guarantee agreement, HUD-158 forms, HUD-718 forms.

2. Indicate how, by whom, and for what purpose the information is to be used. With the exception of a new collection, indicate the actual use for the information received from the current collection.

The recordkeeping requirements for financial institutions include providing monthly loan repayment reports. These reports track how effectively and consistently the borrower (houses of worship) repay their loans.

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.

The Church Arson Loan Guarantee program does not have an on-line electronic data reporting system. As a note, data are collected on a monthly basis through email submissions.

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.

The original Church Arson Loan Guarantee applications were based on specific and separate incidents. The reporting requirement is based on the repayment of a loan.

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.

Information collected does not impact small businesses.

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.

Without the proper information, HUD will be unable to continue to the report monitoring of the loan portfolio.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner that would require respondents to report information to the agency more than quarterly.

Data are collected on a monthly basis as a requirement of HUD's CFO.

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.

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

No payment or gifts will be given to respondents.

10. Describe any assurances of confidentiality provided to respondents and the basis for such assurances in statutes, regulations or agency policies.

Information provided by financial institutions will be confidential to the extent permitted under the rules of the Freedom of Information Act.

11. Provide additional justification for any questions of a sensitive nature, such as behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

No questions of a sensitive nature are required.

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

Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

Total burden hours: 864 Estimation of Burden hours were determined by the following formula:

Total response Hours x Hours per response = Total Burden Hours

$$432 \quad \times \quad 2 \quad = \quad 864 \text{ Burden Hours}$$

	Number of Respondents	Response Frequency	Total Responses	Hours per Response	Annual Burden	Hourly Rate	Annual Costs
Reports	18	12	216	2	432	\$25	\$10,800
Recordkeeping	18	12	216	2	432	\$25	\$10,800
Totals	36	24	432		864		\$21,600

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information (do not include the cost of any hour burden shown in Items 12 and 14).

No capital or start-up costs are anticipated.

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 expenses 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.

Estimated Annualized Cost to the Federal Government

Stages	Monthly Reports	Total Cost
# of Cases	216	
Hours	1	
Cost Per Hour	\$30	
Cost		\$6,480

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

The original subsidy has been expended. HUD will not guarantee additional loans. Therefore, HUD current role is to manage the Church Arson Guarantee portfolio by collecting data to report the status of loan payments.

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.

Information 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.

The expiration date will be displayed.

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

No exceptions to the Certification are sought.