

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification

- 1. Circumstances that make the collection of information necessary.** Identify any legal or administrative or administrative requirements that necessitate the collection.

Submission of the Consolidated Plan is required for grantees who receive one or more of four formula grant programs administered by the Department of Housing and Urban Development's Office of Community Planning and Development: Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG),¹ and Housing Opportunities for Persons with AIDS (HOPWA). The requirement that grantees submit this information is in compliance with statutory provisions of the Cranston Gonzalez National Affordable Housing Act of 1990 that requires participating jurisdictions to submit a Comprehensive Housing Affordability Strategy (Section 105 (b)); the 1974 Housing and Community Development Act, as amended, that requires states and localities to submit a Community Development Plan (Section 104 (b)(4) and Section 104 (m)); and statutory provisions of these Acts that requires states and localities to submit applications and reports for these formula grant programs.

The information collection can be reviewed at:

http://hudstage.hud.gov/offices/cpd/conplan_prototype/main_menu.html

- 2. By whom, how, 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 Department and grantees that submit Consolidated Plans are the primary users of this information. With the revised collection, this information will be submitted electronically through the Integrated Disbursement and Information System (IDIS), the Office of Community Planning and Development's grants management system. The purpose of the Consolidated Plan is to provide HUD with preliminary assessment as to the statutory and regulatory eligibility of proposed grantee projects and for informing citizens of intended uses of program funds.

Grantees use consolidated planning to create a 3-5 year strategic plans for the use of their formula grant funds. The systems upgrades to IDIS, which allow grantees to submit this information electronically, will connect this planning information to the performance reporting that grantees are currently undertake. This connection enables grantees to track progress against the goals they set in the Consolidated Plan throughout each program year.

¹ The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) (P.L. 111-22) renamed ESG as "Emergency Solutions Grants." The Department is currently working on a proposed rule to revise the ESG regulations. The program and the name will remain the same until the final rule is published.

- 3. Consideration of the use of improved information technology.** 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 Department has determined that the use of improved IT systems - through upgrades to the Integrated Disbursement and Information System (IDIS), the Office of Community Planning and Development's grants management system - are being used to allow for electronic submission of this information. One-hundred percent of the reporting and record keeping requirements will be accomplished online. Forms requiring a wet signature will continue to be submitted through the mail as a paper document. The Department does not have the authorization to accept electronic signatures at this time.

- 4. Efforts to identify duplication. Why similar information cannot be used.** Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The Department has not identified other information collections that meet the statutory requirements for Consolidated Plan submission. However, where information in the Consolidated Plan has been required by other offices within the Department, grantees will be provided with that information. For example, tables in the submission template for the Consolidated Plan will be pre-populated with data that has been provided on public housing (by Public Housing Agencies) and homeless programs (by Continuums of Care).

In addition, the Department has identified duplication in the current submission template for the Consolidated Plan. The revised submission template for information collection is reorganized in a way that eliminates duplicative data entry.

- 5. Methods to minimize the burden to small businesses, if involved.** 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.

The information required is collected from State and local governments. Therefore it does not have any impact on small businesses or other small entities.

- 6. Consequences 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 requirement that grantees receiving CDBG, HOME, ESG and/or HOPWA submit a Consolidated Plan every 3-5 years (timing is at the grantee's discretion) and an Annual Action Plan every year is statutory and regulatory. The Cranston Gonzalez National Affordable Housing Act of 1990 and the 1974 Housing

and Community Development Act, as amended, are legal obstacles to reducing this information collection or making the collection less frequent. In addition, the submission of the Consolidated Plan is vital to the Department in determining the preliminary eligibility of grantee's proposed projects for each program year.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the guidelines.

- requiring respondents to report information to the agency more often 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 that 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 secrets, 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.

This collection is conducted in a manner consistent with guidelines at 5 CFR 1320.5(d)(2).

8. Consultation. 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 on 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 may preclude consultation in a specific situation. These circumstances should be explained.

HUD has conducted extensive outreach to grantees regarding enhancements to the Consolidated Plan. HUD staff have demonstrated improvements and sought feedback at grantee stakeholder

conferences and nationwide webinars. In all approximately 3,700 individuals representing grantees and other stakeholder groups have attended presentations and webinars. HUD also hosted two one-month forums on HUD Ideas in Action, an interactive website where users can post ideas and comment and vote on the ideas of others. The top vote-getting ideas from these forums are consistent with the proposed collection. The notice was posted in the Federal Register on January 31, 2012, page 4824, and no comments were received.

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

There is no offer of monetary of material value to the respondents of this information collection (localities and state grantees).

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

The Department does not make assurances of confidentiality pertaining to this information collection.

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.

There are no questions contained in this information collection regarding sensitive or private subjects.

12. Estimates of reporting and recordkeeping hour and cost burdens of the collection of information.

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 for approval 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.
- 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.

Task	Number of Respondents	Frequency of Response	Total U.S. Burden Hours
Consolidated Plan			
<i>Localities</i>			
• Strategic Plan Development	1,000	1	154,000
• Action Plan Development	1,000	1	56,000
<i>States</i>			
• Strategic Plan Development	50	1	21,150
• Action Plan Development	50	1	9,350
Performance Report			
<i>Localities</i>	1,000	1	81,000
<i>States</i>	50	1	6,300
*Abbreviated Strategy	100		8,200
Total	1,150		336,000

*Abbreviated strategy is an abbreviated plan submitted by a local jurisdiction that does not receive direct CDBG or HOME funding. An abbreviated strategy must contain sufficient information about the needs, resources, and planned activities to address the type and amount of assistance anticipated to be funded by HUD. (See 24 CFR 91.235)

A complete Consolidated Plan that contains a Strategic Plan and Annual Action Plan is submitted once every 3-5 years. An Annual Action Plan is submitted once a year. The total number of respondents is 1,150. These include 1,000 local governments and 50 states that receive direct CDBG or HOME funding and are required to submit a complete Consolidated Plan, Annual Action Plan, and Annual Performance Report. Approximately 100 jurisdictions that do not receive direct CDBG or HOME funding submit an abbreviated strategy that is appropriate to the type and amount of assistance sought from HUD. The total number of burden hours is 336,000. The following are estimates of annual costs to respondents for the preparation of a complete Consolidated Plan, Annual Action plan and Annual Performance Report:

Consolidated Plan Respondent Cost Per Site:

Localities

- Strategic Plan (\$26 per hr x 154 hrs) = \$4,004
- Annual Action Plan (\$26 per hr x 56 hrs) = \$1,456

States

- Strategic Plan (\$26 per hr x 423 hrs) = \$10,998
- Annual Action Plan (\$26 x 187 hrs) = \$4,826

Annual Performance Report Cost Per Site:

Localities (\$26 per hr x 81 hrs) = \$2,106

States (\$26 per hr x 126 hrs) = \$3,276

13. Estimates of annualized capital and start-up costs. Provide an estimate for 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).

- 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 and 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 collections 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 10/95 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 is no additional cost to respondents or record keepers for collection of this information for the elements: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component.

14. Estimates of annualized Federal Government Costs. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

Consolidated Plan and Annual Performance Report

- Number of Responses: 2,200
- Hours/response: 15
- Cost/hour*: \$34
- Total cost: \$748,000

* Estimate assumes a blended hourly rate that is equivalent to a GS-12, Step 5, Federal Government Employee

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

This revised information collection decreases burden hours and the cost of this information collection. The revisions include systems upgrades to the Integrated Disbursement and Information System (IDIS), the Office of Community Planning and Development's (CPD) grants management system, which will allow for electronic submission of Consolidated Plans, as well as a redesigned submission template. The template revisions will simplify Consolidated Plan preparation while providing clear guidance to grantees regarding an acceptable submission that meets statutory and regulatory requirements. The systems upgrades will also allow the Department to provide grantees with required Census data for the Consolidated Plan in the format required for submission. This enhancement will result in significant decrease in burden hours for grantees.

Many grantees hire consultants to prepare their Consolidated Plan every 3-5 years. The Department believes that the systems upgrades and changes being made to the submission template will allow grantees to gather the data required for this information collection without the aid of a consultant, thereby decreasing the cost of this information collection to grantees.

16. Information collections data planned to be published for statistical area. For collections 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 results of this information collection will not be published, nor will any complex analytical techniques be used.

17. Explanation for seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Department will display the expiration date for OMB approval of this information collection.

18. Exception to the certification statement. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

The Department does not request an exception to the certification of this information collection.