

Supporting Statement for Paperwork Reduction Act Submissions

Disaster Recovery Grant Reporting System

1. Circumstances that make the collection of information necessary.

a. CDBG Disaster Recovery

The Community Development Block Grant Disaster Recovery (CDBG-DR) program is authorized under Title I of the Housing and Community Development Act of 1974 (HCDA), as amended. According to Section 104(e)(1) of the Act, HUD is responsible for reviewing grantees' compliance with applicable requirements and their continuing capacity to carry out their programs. Program rules are published in the Federal Register pursuant to specific appropriation acts. Under this program HUD provides supplemental CDBG funds appropriated by Congress for recovery from major disasters declared by the President of the United States. Each supplemental appropriations statute specifies the disasters or time period of disaster declarations for which funding is available. Grant funds are made available to states and units of general local government, Indian tribes, and insular areas, unless provided otherwise by supplemental appropriations statute, based on their unmet disaster recovery needs. Unless otherwise restricted by statute or provided by waiver, the funds may be used for any activity eligible under section 105(a) of the Housing and Community Development Act of 1974, as amended, that meets a national objective under section 104(b)(3) of that Act, and is related to the covered disaster. Generally, at least 50 percent of the funds must be for activities that principally benefit persons of low and moderate income. Grantees must report program progress quarterly via a web-based Disaster Recovery Grant Reporting (DRGR) system.

Congress has appropriated the following funds for CDBG disaster recovery since September 18, 2001:

Public Law 107-38, 115 Stat. 220-21, provided \$700 million
Public Law 107-117, 115 Stat. 2336, provided \$2 billion
Public Law 107-206, 116 Stat. 889-92, provided \$783 million
Public Law 108-324, 118 Stat. 1253-54, provided \$150 million
Public Law 109-148, 119 Stat. 2779-81, provided \$11.5 billion
Public Law 109-234, 120 Stat. 472-73, provided \$5.2 billion
Public Law 110-116, 121 Stat. 1343-44, provided \$3 billion
Public Law 110-252, 122 Stat. 2352-53, provided \$300 million
Public Law 110-329, 122 Stat. 3599-01, provided \$6.12 billion
Public Law 111-212, 124 Stat. 2334-35, provided \$100 million
Public Law 112-55, 125 Stat. 683, provided \$400 million

These statutes are located at:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/communitydevelopment/programs/drsi/afwa .

b. Neighborhood Stabilization Program (NSP1 & NSP3)

The Neighborhood Stabilization Program (NSP) was established for the purpose of stabilizing communities that have suffered from foreclosures and property abandonment. On July 21, 2010, President Obama signed the Dodd-Frank Wall Street Reform and

Consumer Protection Act (“Dodd-Frank Act”) into law (Public Law 111-203). This law provides \$1 billion of formula grant funding for the redevelopment of foreclosed upon and abandoned homes to be allocated under the terms of Title XII, Division A, Section 2 of the American Recovery and Reinvestment Act (“Recovery Act”) and by the formula factors provided in Title III of Division B of the Housing and Economic Recovery Act of 2008 (Public Law 110-289) (“HERA”). In 2008, HERA provided for an initial round of formula funding to regular State and entitlement Community Development Block Grant (“CDBG”) grantees through the Neighborhood Stabilization Program (“NSP1”). The Recovery Act provided for a neighborhood stabilization grant competition open to state and local governments, as well as non-profit groups and consortia that may include for-profit entities (“NSP2”).¹ The Dodd-Frank Act is the third round of Neighborhood Stabilization Funding (“NSP3”).

Although NSP funds are otherwise to be considered CDBG funds, HERA, the Recovery Act and the Dodd-Frank Act make substantive revisions to the eligibility, use, and method of distribution of NSP3 funds. For NSP1 and NSP3, grantees are required to submit substantial amendments to their consolidated plans to secure funding they are entitled to under the formulas.

The applicable section of the Dodd-Frank Act, Recovery Act and HERA are attached to this submission. These statutes, along with the Housing and Community Development Act of 1974, mandate and/or authorize the collection of data in this submission.

c. Neighborhood Stabilization Program 3 Technical Assistance (NSP3-TA)

Authorized under the section 1497 of the Wall Street Reform and Consumer Protection Act of 2010 (Pub. L. 111-203, approved July 21, 2010) (“NSP3”), NSP3 Technical Assistance (TA) provides \$20 million to organizations that are experienced and successful in providing program, technical, planning, financial, and organizational capacity building assistance, or consulting in such areas as community development, affordable housing, organizational management, financing and underwriting, construction and rehabilitation management, landbanking, project management and strategic planning. NSP3-TA follows these key objectives: (1) improve grantees' ability to assess conditions in the affordable segment of their local housing market consistent with the jurisdiction's Consolidated Plan and Analysis of Impediments; (2) improve grantees' ability to design and appropriately implement neighborhood stabilization programs based upon an accurate assessment of the affordable segment of their local housing market; (3) increase organizational capacity to leverage private and public dollars; and (4) improve grantees understanding of and compliance with statutory and regulatory requirements. Teams of providers with a broad range of complementary skills and expertise, working collaboratively, were selected through a competitive process.

2. How the information is used.

a. CDBG Disaster Recovery

¹ NSP2 and NSPTA are subject to an information request under OMB Control Number 2506-0185.

Grantees (cities, counties, and states that have received program grants) describe their recovery needs, develop action plans, drawdown funds, report performance, and submit the information to their assigned HUD office for formal review. Grantees may use the system to submit key information on funded activities such as responsible organization, beneficiary data, and grantee oversight. HUD reviews these items, approves or rejects them, and writes comments on its decisions. HUD HQ can work with the data to produce required reports to Congress. HUD HQ uses this data for program management purposes such as risk analysis, remote monitoring, and to respond to inquiries.

b. Neighborhood Stabilization Program

The respondents are formula grantees (states and units of local governments) under NSP1 and NSP3 and competitively selected grantees under NSP2 and NSP-TA. To comply with regulations, NSP1 and NSP3 grantees must submit substantial amendments to their annual action plans or abbreviated plans to receive NSP funds. Substantial amendments will be reviewed by HUD for compliance with requirements set forth in the combined NSP formula notice.

HUD requires all NSP grantees to collect information on the activities undertaken with NSP funds. HUD collects this information from recipients through the Disaster Recovery Grant Reporting System (DRGR). HUD Headquarters will use the information collected through DRGR to track compliance with NSP's statutory commitment and expenditure requirements and to generate the OMB prescribed quarterly reports. Program management reports are generated by DRGR to provide data on the status of each NSP recipients' commitment and disbursement of NSP funds. For NSP2, HUD will use this data to compile quarterly and annual reports to be posted on www.recovery.gov and www.hud.gov/recovery/. HUD HQ uses DRGR data for program management purposes such as risk analysis, remote monitoring, and to respond to inquiries.

c. Neighborhood Stabilization 3 - Technical Assistance

NSP3-TA awardees are competitively selected. Non recurring pre-award information collections include applications and accompanying material. Post-award documentation includes the sub-grant award and executive compensation information as required by the Federal Funding Accountability and Transparency Act of 2006 (Public Law 109-282), and grant agreements. NSP TA awardees will be required to report to the Government Technical Representatives no less than quarterly unless otherwise specified in the cooperative agreement. As part of this required report to HUD, award recipients will update the Disaster Recovery Grant Reporting (DRGR) system with actual outputs and data related to outcomes achieved, and a narrative explanation of any disparity between projected and actual results. HUD Headquarters will use the information collected through DRGR to track compliance by the technical assistance providers with NSP TA's statutory commitment and expenditure requirements, and with the goals of technical assistance stated in the NSP TA Notice of Funding Availability [Docket No. FR-5499-N-01].

3. Improved technology.

DRGR is a computerized, web-based data management system. As of July 2009, HUD users are able to use a single sign-on capability by entering the ID and password they use to log in their workstations. The collection of grant and project level information has been automated by DRGR. DRGR eliminates the need for respondents to submit paper reports. Once recipients are selected, they will be able to get system access by following the instructions on HUD's DRGR system website at <https://drgr.hud.gov/DRGRWeb/request.jsp>.

Last year's DRGR release (7.0) improved security by instituting a certification system where DRGR now requires users to include periodic user acceptance of "Rules of Behavior" for access to the system and certification/recertification of each DRGR user by higher-level users in DRGR.

The most recent release (7.3) enables grantees to create a receipt for each Program Income (PI) transaction, budget and obligate PI funds, identify Revolving Loan Fund activities, create PI accounts identified with development partners and activities, and will require the grantee to utilize all PI or RLF funds prior to using grant funds. It also makes improvements to drawdown vouchers by allowing users to identify multiple revisions to each line item once. There will also be enhanced functionalities such as enhanced tracking of grantee and HUD user data changes and geocoding of addresses entered into the Quarterly Performance Report (QPR).

4. Efforts to identify duplication.

DRGR is both a financial and reporting system, so data previously maintained separately in the Line of Credit Control System (LOCCS) and DRGR is now seamlessly exchanged between the two systems. When DRGR was created, HUD eliminated the previously required paper quarterly and annual reports. Grantees enter the narratives required by their funding source, data on the planned and actual use of funds, and performance projections and actuals. This information is not available elsewhere.

5. Burden to small business or small entities.

While some small communities have received CDBG disaster recovery grants in the past, the economic impact of this information collection effort should be small. Currently, active CDBG DR and NSP grantee users are mostly state, local, or tribal governments. Some non-profit NSP2 grantees and approximately ten NSP technical assistance providers also use DRGR for reporting and draw down of funds.

6. Consequences if information is collected less frequently.

For disaster recovery and NSP2, HUD requires grantees to report to HUD only as frequently as Congress requires HUD to report to Congress (House and Senate Appropriations Committees). As the recovery efforts from each disaster vary

considerably, HUD would be unable to report to Congress on the activity of any grantee not reporting to HUD on a quarterly basis.

For NSP1 and NSP3, HUD considered configuring DRGR for less frequent reporting but concluded that the risks of not maintaining up to date program information were too high in regards to program performance and possible fund recapture.

7. Special circumstances.

There are no special circumstances.

8. Public Notice.

The Notice of Funding Availability (NOFA) for Neighborhood Stabilization Program Technical Assistance and Capacity Building [Docket No. FR-5499-N-01] was published in the *Federal Register* on August 23, 2011. Comments were due September 6, 2011. No comments were received. The Federal Register Notice was published on May 9, 2012 (Vol. 77, No.90 at page. 287242). No comments were received.

9. Payment or gifts.

No payment or gift is provided to respondents.

10. Assurance of Confidentiality.

This issue does not pertain to the data stored in DRGR. However, access to the system is restricted to ensure that only authorized users are entering information into the system. Grantee users are only allowed to work with their own grant's data. A local grantee system administrator has control over who from the local staff can work on the grantee's data. With the exception of three "superusers" from the HQ program office, HUD staff cannot change local data. They can only view it and submit comments on it. The system records user logins and can track certain changes by the user who made them.

11. Questions of a Sensitive Nature. None.

12. Explanation of hour and cost burden to Grantees.

The following are general rules for all 3 programs described below in *a*, *b*, and *c*, unless otherwise stated:

- The calculation of cost burden for DRSI grantees takes into account the size of the grantee based on amount of funds received. Grantees have been divided between average-sized (less than \$100M) and large (over \$100M). All NSP grantees fit into the average-size category.

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- HUD requires each grantee to report their performances to the system quarterly. Some grantees have more than one open grant under different appropriation rules. Such a grantee must make one submission per grant per quarter.
- Submissions include drawdown vouchers and quarterly performance reports (QPR). There may be several line items included in each voucher and several activities reported on within a QPR. Vouchers from large grantees normally tend to include significantly more line items and require much greater time to process than average grantees,
- Submissions during the pre-award and post-award periods only take place once. Submissions during the quarterly reporting period continue through the life of the grant. The figures below represent submissions that will occur during the time period associated with this collection based on averages derived from FY 11. A copy of the estimation calculation worksheet is attached.
- Cost figures are estimated based on local staff earning the equivalent of a GS-11 hourly rate.

a. Disaster Recovery

The system has approximately 72 open CDBG disaster recovery grants. The table below includes recurring submission reporting time calculations.

Recurring submissions include quarterly progress reports and voucher submissions. For average-sized grants, the Department estimates 13 minutes needed per voucher. CDBG-DR grantees process approximately 19 vouchers per year. This requires a record keeping and reporting burden of approximately 4 hours per grantee, per year. Larger CDBG-DR grantees take approximately 44 minutes for each voucher and submit an average of 146 vouchers per year, resulting in approximately 106 burden hours per year, per grantee. Therefore, all CDBG-DR grantees collectively spend an estimated 2,241 hours submitting vouchers in the DRGR system for a total estimated annual voucher submission cost of \$54,016.

Average-sized grantees spend an estimated 9 hours on each QPR, for a total of 1,908 hours. Large grantees spend an estimated 57 hours per QPR for a total of 4,332 hours. Therefore, all grantees collectively spend an estimated 6,240 hours per year submitting QPR data in DRGR. Total annual QPR submission costs an estimated \$ 150,384.

CDBG Disaster Recovery								
	Description of Information Collection	Number of Respondents	Number of Responses	Total Number of Responses	Hours Per Response	Total Hours	Cost Per Response	Total Cost
	REPORTING (Annual)							
Recurring	Average Sized Grants Online Quarterly Reporting via DRGR	53	4	212	9	1,908	\$217	\$45,983
	Large Grants Online	19	4	76	57	4,332	\$1,374	\$104,401

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Quarterly Reporting via DRGR								
Average-sized grants online voucher submissions	53	19	1,013	0.22	223	\$5	\$5,371	
Large-sized grants online voucher submission	19	146	2,765	0.73	2,018	\$18	\$48,645	
TOTAL PAPERWORK BURDEN	N/A	173	4,066	N/A	8,481	N/A	\$204,400	

b. Neighborhood Stabilization Program

There are currently 577 open NSP grants in DRGR. The following table demonstrates the estimated paperwork burden for one-time only submissions such as substantial amendments and recurring submissions.

One time only submissions:

One-time only pre- and post-award submissions for the 270 new NSP3 grants, such as substantial amendments and standard forms, total an estimated 15,232 hours at a cost of \$369,272.

Recurring submissions:

For the 577 active NSP grants in the DRGR system, the Department estimates 11 minutes per voucher submission. NSP grantees process approximately 34 vouchers per year. This requires a record keeping and reporting burden of approximately 3,899 hours for an annual voucher submission cost of \$93,970.

NSP grantees spend an estimated 4 hours per QPR submission, for a total of 9,232 hours for a total annual QPR submission costs \$222,491.

Neighborhood Stabilization Program								
	Description of Information Collection	Number of Respondents	Number of Responses	Total Number of Responses	Hours Per Response*	Total Hours	Cost Per Response**	Total Cost
Non-recurring	PRE-AWARD SUBMISSION REQUIREMENTS							
	Substantial Amendment to Annual Action Plan	270	1	270	40	10,800	\$964.00	\$260,280
	SF 424	270	1	270	0.75	203	\$18.08	\$4,880

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g	POST-AWARD							
	Grant Agreement (HUD 40092)	270	1	270	1	270	\$24.10	\$6,507
	Grantee's Written Agreements	270	1	270	5	1350	\$120.50	\$32,535
	DRGR Activation, Activity Set-Up and Completion	270	1	270	10	2700	\$241.00	\$65,070
Recurri ng	REPORTING (Annual)							
	Online Quarterly Reporting via DRGR	577	4	2308	4	9232	\$96.40	\$222,491
	DRGR voucher submissions	577	38	21662	0.18	3899	\$4.34	\$93,970
	TOTAL PAPERWORK BURDEN	N/A	47	25320	N/A	28,454	N/A	\$685,733

c. Neighborhood Stabilization Program 3 - Technical Assistance

The following table demonstrates the estimated paperwork burden for one-time only and recurring submissions. The DRGR system currently has 10 open NSP3-TA grants.

Pre-award one-time only submissions for 42 applications total an estimated 1,680 hours at a cost of \$40,488. Post-award one-time only submissions for the 10 grantees awarded funds total an estimated 168 hours at a cost of \$4,037.

Historical data on voucher and QPR submissions for technical assistance grants were extremely limited at the time this collection was being assembled. Therefore, the times used to calculate NSP grant cost burden will be applied to NSP3-TA grant cost burden. For 10 average-sized grants, the Department estimates 11 minutes per voucher. Grantees process approximately 38 vouchers per year. Total burden hours for all grantees over the course of the year is estimated at 380, for a total annual submission cost of \$1,648.

10 average-sized grantees spend approximately 4 hours submitting each QPR, for a total of 120 hours over the course of a year. Total annual QPR submission costs approximately \$2,892.

Neighborhood Stabilization Program 3 - Technical Assistance								
	Description of Information Collection	Number of Respondents	Number of Responses	Total Number of Responses	Hours Per Response*	Total Hours	Cost Per Response**	Total Cost
Non-	PRE-AWARD SUBMISSION REQUIREMENTS							
	Response to NOFA	42	1	42	40	1,680	\$964.00	\$40,488
	SF 424	10	1	10	0.75	8	\$18.08	\$181

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recurring								
	POST-AWARD							
	Grant Agreement (HUD 40092)	10	1	10	1	10	\$24.10	\$241
	Grantee's Written Agreements	10	1	10	5	50	\$120.50	\$1,205
	DRGR Activation, Activity Set-Up and Completion	10	1	10	10	100	\$241.00	\$2,410
Recurring	REPORTING (Annual)							
	Online quarterly reporting via DRGR	10	4	40	4	160	\$96.40	\$3,856
	DRGR voucher submissions	10	38	380	0.18	68.4	\$4.34	\$1,648
	TOTAL PAPERWORK BURDEN	N/A	47	502	N/A	2,076	N/A	\$50,029

13. Estimate of Additional Total Costs to Respondents

The Disaster Recovery Grant Reporting (DRGR) system does not have any additional costs associated with this collection.

14. Estimate of Annualized Cost to Federal Government

The hourly rate by which the cost is calculated is \$30/hr. The total cost to the government for working with the data is estimated to be \$892,447 (year 1) and \$311,932. (subsequent annual), based on an estimated 29,508 hours (year 1) and 10,398 hours (subsequent annual). System development and maintenance costs are not included in these estimates.

15. Explanation of Program Changes / Adjustments

This collection consolidates NSP-1, NSP-3, and CDBG Disaster Recovery and NSP3-Technical Assistance grants under one "DRGR" submission. DRGR is the grant reporting system used for all of these programs. A separate collection exists for NSP2, which includes NSP-TA funded by the NSP2 appropriation.

Major functions have been added to DRGR through Release 7.3. These new functions are detailed at: http://www.hud.gov/offices/cpd/communitydevelopment/programs/drsi/pdf/drgr_7_functions.pdf.

To briefly summarize the new functions added with Release 7.0:

- Public Reports: Financial Update Dashboards provide tables detailing the amount of funds by grant, project, or activity category that have been disbursed in DRGR. While this report provides a snapshot of progress, the Quarterly Expenditure Analysis reports identifies disbursements across quarters using data from the QPRs. This allows users to examine spending trends by grants, projects, or activity categories across the life of the grants.
- Prior Period Performance Data Adjustments: DRGR was modified to check cumulative totals across all QPRs (low + mod ≤ TOTAL) rather than IN-QUARTER data. Grantees may now also enter negative numbers to correct data in prior periods, as needed.
- DRGR Security Enhancements-User Certification: DRGR is now required to include periodic user acceptance of “Rules of Behavior” by each user for access to the system and certification/recertification of each DRGR user by higher-level users in DRGR.
- DRGR Beneficiary Data: Under Release 7.0, grantees will have additional options for beneficiary data similar to IDIS. They will be able to classify activities based on whether they will have a direct or area benefit. This will be used to determine what beneficiary data will be required in the Action Plan vs. QPR.
- DRGR Area Benefit Screens: DRGR is being modified to add Census Tract and Block Group screens similar to those in IDIS so that grantees can identify the Census Tracts and/or Block Groups for activity service areas, as needed.
- DRGR Direct Benefit Screens: Grantees will now be able to input information on demographics of persons assisted under CPD-funded activities for purposes of CPD and/or FHEO monitoring. In addition, grantees will be able to input more detailed information on whether households assisted are renter or owner-occupied and whether the housing units affected are single family or multi-family units.

To summarize the new functions added with Release 7.3:

- Receipts, Revolving Loan Funds (RLF) and Program Income (PI) Accounts: Grantees will be able to create a receipt for each PI transaction, include PI funds in activity budgets and obligations, identify RLF activities, and create PI accounts for organizations allowed to retain PI. DRGR will also require the grantee to utilize all PI or RLF funds prior to using grant funds.
- Voucher Improvements: Drawdown users will be able to identify multiple revisions to each line item at once. They will be able to create PDFs of vouchers has been added. Grantee users will have comment fields to explain voucher revisions have been added and returned funds will now be able to be categorized when reassigning these funds. Vouchers rejected by LOCCS will now include the description of the rejection code to assist the user with identifying corrective action needed.

- Data Change Tracking, User Account Management, and User Certifications: Each Action Plan change relating to budgets and performance goals will be tracked so that the Quarterly Performance Reports (QPRs) will display Action Plan data as of the end date of the QPR. Activity budget change histories will be maintained with User ID and date/time each change was made and a report will be available to show these changes. DRGR will maintain historical data for each certification and a report will be available to show the history of certifications. HUD field administrative screens for certification of grantee administrative users will display the grantee name for each user. HUD field admin screens for certification of grantee admin users will be available to HQ field office managers in DRGR so they can certify grantee admin users if the CPD contact is not available. Grantee users can be associated with more than one grantee profile and HUD staff will be able to be associated with more than one HUD office. However, each user account will still need to be certified and assigned to individual grants by grantee administrative users from each grantee.
- Miscellaneous Grantee Functions: The Edit Action Plan page will now display project groupings, which can be expanded to show associated activities instead of displaying a master list of the activities. DRGR will now incorporate a method to verify the accuracy of all addresses through HUD's Geocode Service Center (GSC) As part of this process, DRGR will indicate when an address does not appear valid and allow users to make corrections. All Action Plan add/edit activity screens will now display the Grant Number, the Grantee Activity Number and Activity Title. Proposed accomplishments for all measures that have estimate in the DRGR Action Plan will be displayed in each QPR regardless of whether any accomplishments are reported that quarter. In the ADMIN module, Monitoring, Audits and Technical Assistance will now be selected at the event level (instead of the finding/topic level) so that visits and reports will display better on the QPR.

16. Publication of Results

Each quarter HUD prepares reports from the data system that highlights the uses of funds and accomplishments of grantees. A synthesis of these reports is presented to Congress.

17. Display of the Expiration date for OMB Approval of the Information Collection

HUD is not seeking approval to not display the expiration date for OMB approval.

18. Explanation of Each Exception to the Certification Statement

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No exceptions are requested.