

**SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION**  
**Community Development Block Grant Recovery Program**

**A. Justification**

This submission is to request an extension of this currently approved information collection for the reporting burden associated with information that Community Development Block Grant Recovery (CDBG-R) grantees report in the Integrated Disbursement and Information System (IDIS), the Recovery Act Management and Performance System (RAMPS), and on [federalreporting.gov](http://federalreporting.gov) for CDBG-R-assisted activities, recordkeeping requirements, and reporting of CDBG-R assisted activities as they are completed and closing out the CDBG-R program. This submission is limited to the reporting burden under the CDBG-R program, which is covered by OMB control number 2506-0184.

Need for the Information Collection

1. This request identifies the estimated reporting burden associated with information that CDBG-R grantees are reporting in IDIS, RAMPS, and on [federalreporting.gov](http://federalreporting.gov) for CDBG-R-assisted activities, recordkeeping requirements, and reporting of CDBG-R assisted activities as they are completed and closing out the CDBG-R program. Grantees are encouraged to update their accomplishments in IDIS, RAMPS, and [federalreporting.gov](http://federalreporting.gov) frequently and are required to report on a quarterly basis in accordance with Section 1512 of the American Recovery and Reinvestment Act of 2009 (the Recovery Act). In addition, in accordance with 24 CFR 570.506, grantees are required to retain records necessary to document compliance with statutory and regulatory requirements, Executive Orders, applicable OMB Circulars, and determinations required to be made by grantees as a determination of eligibility.
2. This request identifies the estimated reporting burden associated with additional information that CDBG-R grantees are reporting in IDIS, RAMPS, and on [federalreporting.gov](http://federalreporting.gov) for CDBG-R-assisted activities. The information required for any particular activity is generally based on the eligibility of the activity and which of the three national objectives (benefit low- and moderate-income persons; eliminate/prevent slums or blight; or meet an urgent need) the grantee has determined that the activity will address. Grantees provide information in IDIS, RAMPS, and on [federalreporting.gov](http://federalreporting.gov) that documents the outputs obtained from individual activities, and the performance measurement data will enable HUD to report on the outcomes that result from the use of CDBG-R funds.

The respondents are CDBG grantees that received CDBG grant funding in Fiscal Year 2008 in accordance with the principles of 42 U.S.C. 5306 (metropolitan cities, urban counties, Insular Areas, states, and nonentitlement counties in Hawaii) that have not completed the carrying out of CDBG-R assisted activities and/or have not closed out their CDBG-R program grants. The Recovery Act required that all CDBG-R funds be expended by September 30, 2012. Funds not expended by this date would be recaptured and returned to the Treasury. However, not all CDBG-R assisted activities were

physically complete because new activities were added over time when grantees amended their 2008 substantial amendments to add such activities because previously identified activities came in under budget, were identified as imprudent, or did not meet the purposes of the Recovery Act. Once CDBG-R assisted activities meet a national objective and are physically complete, grantees may proceed in closing out their CDBG-R programs. HUD expects grantees to be ready to begin closing out their grants by March 31, 2013. Grantees are required to report on the CDBG-R-eligible activities that are in progress but not completed (such as infrastructure improvements, acquisition of real property, homeowner rehabilitation, public improvements, and public services) and how those activities met one of the three national objectives. In addition, grantees are also required to make the information identified in this paragraph publicly available by posting it on a website. CDBG-R grantees that have completed all CDBG-R assisted activities and are closing out their CDBG-R grants must also prepare and submit to HUD their final report in [federalreporting.gov](http://federalreporting.gov), a CDBG-R Closeout Checklist, Grant Closeout Agreement, and a Federal Financial Report (SF 425) to local HUD Field Offices.

3. IDIS is an electronic system that grantees use to report information to HUD on their use of regular CDBG funds, and to prepare and submit requests for drawdowns of funds from their lines of credit. IDIS has been modified to permit reporting on CDBG-R assisted activities separately from those assisted with regular CDBG funds. Grantees can input information about their CDBG-R-assisted activities, including accomplishments, into IDIS on an on-going basis throughout their program year. Grantees are required to report on their CDBG-R assisted activities on a quarterly basis, and this information must also be reported on grantees' websites. Grantees can generate reports from IDIS to more readily inform constituents of how CDBG-R funds are used, and HUD can easily access the information in IDIS for management and oversight purposes. Because this was a one-time allocation, it would not have been feasible or economically sound to create an electronic system for this program.

RAMPS is an electronic system that is used to manage information to demonstrate grantee compliance with the National Environmental Policy Act (NEPA) as required by Section 1609 of the Recovery Act. Grantees are required to enter environmental information for each CDBG-R activity in RAMPS on a quarterly basis.

[Federalreporting.gov](http://federalreporting.gov) is a government-wide system that is used to collect data on job creation and retention as required by Section 1512 of the Recovery Act. Grantees are required to enter job creation/retention information for each CDBG-R activity on [federalreporting.gov](http://federalreporting.gov) on a quarterly basis.

4. Some of the information (such as job/creation retention, environmental review) that will be entered into IDIS may also be entered into RAMPS and on [federalreporting.gov](http://federalreporting.gov).
5. Not applicable because no small entities are impacted as State and local governments are not considered small entities.

6. If no records are collected on this aspect of the program, program performance/regulatory compliance will not be able to be determined. The Recovery Act precludes a less frequent information collection. More importantly, the information being collected is the minimum necessary to implement the statute and achieve its stated purposes and objective. Section 1512 of the Recovery Act requires that not later than 10 days after the end of each calendar quarter, each recipient that received recovery funds from a federal agency shall submit a report to that agency that contains: (1) the total amount of recovery funds received from that agency; (2) the amount of recovery funds received that were expended or obligated to projects or activities; and (3) a detailed list of all projects or activities for which recovery funds were expended or obligated, including the name of the project or activity; a description of the project or activity; an evaluation of the completion status of the project or activity; an estimate of the number of jobs created and the number of jobs retained by the project or activity; and for infrastructure investments made by State and local governments, the purpose, total cost, and rationale of the agency for funding the infrastructure investment with funds made available under the Recovery Act and name of the person to contact at the agency if there are concerns with the infrastructure investment. Not later than 30 calendar days after the end of each calendar quarter, each agency that made Recovery Act funds available to any recipient shall make the information in reports submitted publicly available by posting the information on a website. Grantees' agreements with subrecipients or units of general local government must contain a special contract condition requiring them to comply with the reporting requirements established for CDBG-R funding. Grantees that have not completed their CDBG-R assisted activities are required to continue to report this information.
7. This information is being collected in a manner consistent with the guidelines in 5 CFR 1320.6.
8. HUD published a notice describing the Paperwork Reduction Act Submission in the Federal Register on December 14, 2012, vol 77, page 74491 for 60 days, and no comments were received.
9. No payment or gift to respond is allowed.
10. Reports on the expenditure of CDBG-R funds must be made available to the public via [www.hud.gov/recovery](http://www.hud.gov/recovery) and grantees' websites; therefore, no assurances of confidentiality are offered. Sensitive, individual-level information is not disclosed in these reports.
11. The information does not include any question of a sensitive nature, such as sexual orientation and attitudes, religious beliefs, and other matters that are commonly considered private.
12. A representative from each of the 200 remaining respondents will be required to report quarterly on their expenditure of CDBG-R funds. The estimated hour burden is 25,600.

According to the Recovery Act, CDBG-R allocations are based on the formula used by the regular CDBG program. Using this formula resulted in a total of 1,167 grantees

(metropolitan cities, urban counties, states, non-entitlement counties in Hawaii, and Insular Areas) that are eligible to receive CDBG-R funds. However, approximately 200 grantees will have incomplete activities and/or have not closed out their CDBG-R grants.

Estimates of public burden have been derived through program staff experience, and are shown in the table below:

| <b>Submission Documents</b>                                   | <b>Number of Respondents</b> | <b>Responses Per Year</b> | <b>Total Annual Responses</b> | <b>Hrs per Response</b> | <b>Total Hours</b> |
|---|------------------------------|---------------------------|-------------------------------|-------------------------|--------------------|
| Reporting Requirements American Recovery and Reinvestment Act | 200                          | 4                         | 800                           | 32                      | 25,600             |

Respondents' average annualized cost:  $\$21 \times 800 = \$16,800$

13. There are no additional costs to respondents.
14. Estimates of annualized costs to the Federal government (clerical and professional staff time):
 

Review each quarterly report ( $\$34.30 \text{ per hr.} \times 1 \text{ hr.} \times 200$ ) =  $\$6,860$ .
15. This is a revision of the new collection that was submitted to OMB and approved on January 31, 2010, and expires on January 31, 2013. This submission includes recordkeeping, quarterly reporting, and CDBG-R program closeout. The application portion and associated forms are no longer necessary.
16. The results of this collection of information will not be published for statistical use.
17. No approval is sought to not display the expiration date for OMB approval of the information collection.
18. No exceptions.