

## A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that require the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Department of Housing and Urban Development administers congressionally mandated grants known as earmarks. These projects are identified in HUD's annual appropriation of funds and in the conference report or congressional record accompanying the appropriation. Grantees are required to comply with 24 CFR Part 84 or Part 85, as applicable. This information is collected in order to make grant funds available to entities that have directed to receive funds by Congress. There have been no earmarks appropriated under the HUD appropriations since FY2010; therefore, the Department does not anticipate any new applications for these types of grants. At this time, the HUD Congressional Grants Division administers approximately 1,400 open grants, for which semi-annual reports are required.

2. Show how, by whom, and for what purpose the information is to be used. Except for a new collection, show the actual use the agency has made of the information received from the current collection.

HUD's Congressional Grants Division and its Environmental Review Officers in the HUD field offices use this information to make funds available to entities directed to receive funds appropriated by Congress. This information is used to collect, receive, review and monitor program activities through applications, semi-annual and close-out reports. The information that is collected is used to assess performance. Grantees are units of state and local government, nonprofits and Indian tribes. Respondents are initially identified by Congress and generally fall into two categories: Economic Development Initiative-Special Project (EDI-SP) grantees and Neighborhood Initiative (NI) grantees. The agency has used the application, semi-annual reports and close-out reports to track grantee performance in the implementation of approved projects.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technical collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision of adopting that means of collection. Also, describe any consideration of using information technology to reduce the burden.

Applications are generally submitted electronically, through grants.gov. Semi-annual and reporting forms and other forms are generally submitted in paper form. Electronic submission of these latter forms will be possible with the establishment of a Department-wide "back end" information system for grants management. In an effort to reduce reporting burdens, the Department is able to accept reports in PDF format, through email submissions by grantees.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in 2 above.

Each funded project is a new program and the information collected is unique to that program.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe the methods used to reduce the burden.

The information collected does not impact small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is or is not conducted less frequently, and any technical or legal obstacles to reducing the burden.

All information collected is used to carefully consider applications for funding and grantee project implementation. If HUD collects less information, or collected information less frequently, the Department would be unable to determine the eligibility of applicants or the extent to which grantees are carrying out projects consistent with the approved application for those funds. Without the information collection, recipients would be unable to apply for funds, report progress, request funds or closeout grants.

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 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 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 prove that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances within this standard that require collection of information collection under the circumstances outlined above.

8. This information collection was announced in the Federal Register, Volume 79; Page 660, on 01/06/2014. In response to the Proposed Information Collection HUD received submissions no comments.

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

Information collection does not involve any payments or gifts to respondents.

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

No assurances of confidentiality are involved.

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.

No such information is required to be reported.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- Show 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 burdens, and explain the reasons for the variance. General 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 burdens estimates for each form and aggregate the hour burden in Item 13 of OMB Form 83-1.
- 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 14.

Form HUD-27053

Respondents	Responses Per Annum	Total Responses	Hrs. Per Response	Total Hours	Hourly Rate	Total Cost Per Annum
1400	1	1400	.5	700	\$33.50	\$23,450

Form HUD-27054

Respondents	Responses Per Annum	Total Responses	Hrs. Per Response	Total Hours	Hourly Rate	Total Cost Per Annum
700	1	700	.25	175	\$33.50	\$5,862.50

Form HUD-27056

Respondents	Responses	Total	Hrs. Per	Total	Hourly	Total Cost
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	Per Annum	Responses	Response	Hours	Rate	Per Annum
200	1	200	.25	50	\$33.50	\$1,675

Total:  $\$1675 + \$5862.50 + \$23450 = \$30,987.50$

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 estimates of the total annual cost burden to respondents or recordkeepers resulting from this collection of information are included in Item 12.

14. Provide estimates of the 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), 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 into a single table.

It takes approximately 30 minutes to process a form, that includes reading the material sent to us, analyzing it and then processing the form that has been received.

Average Salary  $\$42/\text{hour} \times .1/2\text{hour to process} \times 2500 \text{ forms} = \$52,500$

Administrative Assistant

Opening and distribution of the form

Average salary  $\$25.00/\text{hr} \times 1/4\text{hour to open mail and deliver} \times 2500 \text{ forms} = \$15,625.$

$\$52,500 + \$15,625 = \$68,125.$

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

There are fewer grants because no new appropriations have taken place since 2010. Some grants have closed, therefore there are a fewer number of grantees completing paperwork.

Changes in the number of burden hours and grantees completing the form are due to not including the standard forms totals as directed by OMB. Estimates in the annualized cost to the federal government were calculated using the average salary of a specialist analyzing the forms and the salary of support staff to assist.

16. For collections of information whose results will be published, outline plans for tabulations, 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.

No information collected will 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 Department is not seeking such approval.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

The Department is not seeking any exceptions.