



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

OFFICE OF THE ASSISTANT SECRETARY FOR
COMMUNITY PLANNING AND DEVELOPMENT

AUG 26 2014

Mr. Patrick Fuchs
OMB Desk Officer
Office of Management and Budget
New Executive Office Building
Washington, DC 20503

Dear Mr. Fuchs:

The Department of Housing and Urban Development (HUD) is seeking emergency review of the Paperwork Reduction Act (PRA) requirements contained in the Community Planning and Development (CPD) "Community Development Block Grant – National Disaster Resilience (CDBG-NDR) Notice of Funding Availability (NOFA)". This Notice of Paperwork Submission for applicants to request review of the most impacted and distressed threshold responses the NOFA (copy enclosed), proposed for immediate publication explains the burden of the collection invites public comments.

Under Public Law 113-2, Congress provided \$16 billion for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas resulting from a major disaster declared pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.) due to Hurricane Sandy and other eligible events in calendar years 2011, 2012, and 2013. This amount was reduced to \$15.2 billion due to sequestration in Fiscal Year 2013. Of this amount, \$998,108,000 will be made available under this NOFA.

In accordance with the CDBG-NDR NOFA requirements, during the first 45 days after publication of this NOFA, any potential Applicant may provide HUD a single written request with its "most impacted and distressed" and "unmet needs" threshold responses for one or more potential target areas. HUD will review these requests and respond to confirm or reject whether the information provided for each area meets the thresholds and provide specific reasons for any rejection. Phase 1 applications will be due 180 days after NOFA publication. HUD will score Phase 1 applications, and select qualifying applicants to submit a Phase 2 application. CDBG-NDR recipients will be required to administer awarded funds in the Disaster Recovery Grant Reporting (DRGR System), which will enable HUD staff to review budgets and accomplishments and allows grantees to draw grant funds from Treasury.

HUD has determined that to respond to the urgent recovery needs of communities affected by these eligible major disasters, a collection of information is needed prior to the expiration of time periods established under the PRA. Not only is this information collection essential to HUD's mission to create strong, sustainable, inclusive communities and quality affordable homes for all, the information collection is required by Public Law 113-2. That statute provides that the "Secretary shall allocate to grantees... based on the best available data," which at this stage in recovery must be collected from applicants.

The immediate collection of data is essential to the provision of assistance for recovery needs that date as far back as 2011. Congress has declared that disasters “disrupt the normal functioning of governments and communities, and adversely affect individuals and families with great severity.” (42 U.S.C. 5121(a)).


The Department anticipates the NOFA will be published in late August 2014, thus rendering it impossible to comply with the standard PRA Collection review timeline before “most impacted and distressed” and “unmet needs” threshold responses are submitted to HUD for review. HUD cannot reasonably comply with the PRA’s normal procedures without delaying allocation of critical assistance, which would aggravate the public harm caused by the disaster.

This emergency processing is requested to ensure the Department can accept 45-day threshold responses submitted by CDBG-NDR Applicants according to the requirements of the Paperwork Reduction Act with the shortened timeline directed by the Secretary. Recurring quarterly reporting and voucher submissions for CDBG-NDR recipients will be included as part of a revision to the existing DRGR PRA Collection (OMB # 2506-0165). Because Phase 1 and Phase 2 applications will not be due until well after the 60 day period expires for this emergency PRA approval, HUD will seek review of the PRA requirements for Phases 1 and 2 Applications under the CDBG-NDR NOFA as well as post- award requirements according to the standard review timeline.

In compliance with the requirements of 5 CFR 1320.13, this letter requests emergency processing within 14 days from the date of the Federal Register publication of the Notice of Submission of Proposed Information Collection to OMB.

Thank you for your consideration in this matter.

Sincerely,



Clifford Taffet
General Deputy Assistant Secretary
for Community Planning and Development