
19. Certification for Paperwork Reduction Act Submissions

On behalf of the U.S. Department of Housing and Urban Development, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9.

Note: The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320/8(b)(3), appear at the end of the instructions. The certification is to be made with reference to those regulatory provisions as set forth in the instructions.

The following is a summary of the topics, regarding the proposed collections of information that the certification covers:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities;
- (d) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) It indicates the retention periods for recordkeeping requirements;
- (g) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
 - (i) Why the information is being collected;
 - (ii) Use of the information;
 - (iii) Burden estimate;
 - (iv) Nature of response (voluntary, required for a benefit, or mandatory);
 - (v) Nature and extent of confidentiality; and
 - (vi) Need to display currently valid OMB control number;
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to collected (see note in item 19 of the instructions);
- (i) It uses effective and efficient statistical survey methodology; and
- (j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in item 18 of the Supporting Statement.

Signature of Program Official:

X

Date:

Signature of Senior Officer or Designee:

X
Lillian Deitzer, Departmental Reports Management Officer,
Office of the Chief Information Officer

Date:

Supporting Statement for Paperwork Reduction Act Submissions

National Disaster Resilience Competition (NDRC) Phase 1 and Phase 2 Applications and and Community Development Block Grant National Disaster Resilience (CDBG-NDR) Pre- and Post-Award reporting in the Disaster Recovery Grant Reporting (DRGR) system

A. Justification

1. Circumstances that make the collection of information necessary.

The Community Development Block Grant (CDBG) 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.

The recent Hurricane Sandy supplemental appropriation (P. L. 113-2) provides funding for Hurricane Sandy disaster recovery efforts and other eligible events in 2011, 2012 and 2013. The appropriation directs the Department to address these efforts in areas of greatest unmet need. 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.

2. How the information is used

NDRC Phase 1 applications will be due 180 days after publication to be specified in the NOFA. HUD will score Phase 1 applications, and select qualifying applicants to submit a Phase 2 application. In accordance with the NDRC 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. HUD will also invite a number of Phase 1 Applicants that are not invited to continue to Phase 2, but have met all thresholds, submitted a complete application, and demonstrated unmet disaster recovery needs in Phase 1 to submit an Action Plan for Disaster Recovery in accordance with an allocation Notice to be published in the Federal Register after the Phase 2 invitations are determined. Applicants awarded CDBG-NDR funding in NCRC Phase 1 and Phase 2 will use the web-based Disaster Recovery Grant Reporting (DRGR) to develop action plans, drawdown funds, report performance, and submit the information to their assigned HUD office for formal review. CDBG-NDR 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 Headquarters can use the data to produce required reports to Congress. HUD Headquarters uses this data for program management purposes such as risk analysis, remote monitoring, and to respond to inquiries.

3. Improved technology.

Requests submitted during the first 45 days after publication of the NDRC NOFA for HUD to review any potential Applicant's "most impacted and distressed" and "unmet needs" threshold responses for one or more

potential target area must be submitted to ResilientRecovery@hud.gov and include the Applicant name; name, title, email address, telephone number, and agency of a contact person employed by the Applicant to which HUD shall respond. Phase 1 and Phase 2 applications will be submitted in the Grants.gov system.

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>.

Updates to DRGR have improved security by instituting a certification system that 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. Further, the system now enables grantees to create a receipt for each Program Income (PI) transaction, budget and obligate PI funds, identify Revolving Loan Fund (RLF) activities, create PI accounts identified with development partners and activities, and requires the grantee to utilize all PI or RLF funds prior to using grant funds. The system also allows users to identify multiple revisions to each line item in a drawdown voucher once. Finally, DRGR has been enhanced to track grantee and HUD user data changes and geocode addresses entered into the Quarterly Performance Report (QPR).

4. Efforts to identify duplication.

No similar information exists. Phase 1 Applications submitted pursuant to the NDRC NOFA are unique to Resilient Disaster Recovery projects or programs to be developed by each individual Applicant.

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.

The only eligible applicants for this funding opportunity are HUD-identified local and State governments that experienced a presidentially-declared major disaster during 2011-2013. HUD-identified applicants include the District of Columbia and the Commonwealth of Puerto Rico, which are included in the definitions of "unit of general local government" and "State" in §102 of the Housing and Community Development Act of 1974, as amended (HCD Act). As such, HUD expects that such organizations should have the capacity to adhere to the NOFA requirements.

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 DRGR grantee users are state, local, or tribal governments.

6. Consequences if information is collected less frequently.

HUD cannot acquire the best available data to assess "most impacted and distressed" and "unmet needs" of local and State governments that experienced a presidentially-declared major disaster during 2011-2013, which is needed to allocate funds in accordance with P. L. 113-2.

For disaster recovery, 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.

7. Special circumstances

There are no special circumstances.

8. Public Notice.

N/A

9. Payment or gifts.

No payment or gift is provided to respondents.

10. Assurance of Confidentiality

Recipients of the assistance will collect and maintain records of information. Information on activities and expenditures of grant funds is public information and is generally available for disclosure. Recipients are responsible for ensuring confidentiality when public disclosure is not required.

This issue does not pertain to the data stored in DRGR. However, access to the system is restricted to ensure that only authorized users enter 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. Annual Reporting and Recordkeeping Burden

The following tables demonstrate the estimated paperwork burden for eligible NDRC NOFA applicants, including Phase 1 submissions due 180 days after publication of the NOFA, Phase 2 applications and pre- and post-award CDBG-NDR planning and reporting in DRGR. The total annualized burden hours in both NOFA Phases and DRGR reporting are 42,489, for a total cost of \$1,555,013. In response to comments received during the 60-day Federal Register notice for this Submission, HUD has added a new checklist for the Most-Impacted and Distressed Threshold response to the NDRC NOFA application requirements. An additional 2 hours were added to the burden hours for the Threshold response in each of Phase 1 and Phase 2.

The calculation of burden for CDBG-NDR grantees is based on the maximum number 67 grants if each eligible grantee receives either an NDRC Phase 1 or Phase 2 CDBG-NDR award. HUD requires each CDBG Disaster Recovery grantee to report their performance in DRGR quarterly. 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. Burden estimates are based on average data entry currently in DRGR.

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. Cost figures are estimated based on local staff earning the equivalent of a GS-13 salary of \$34.80/hr. The total annualized burden hours in for pre- and post-award reporting in DRGR are 4,757 for a total estimated cost of \$165,544.

Recurring submissions include quarterly progress reports and voucher submissions. For average-sized grants, the Department estimates 13 minutes needed per voucher. CDBG-DR grantees currently process approximately 19 vouchers per year. This requires a record keeping and reporting burden of approximately 4 hours per grantee, per year. Therefore, all potential CDBG-NDR grantees could collectively spend an estimated 280 hours submitting vouchers in the DRGR system for a total estimated annual voucher submission cost of \$10,184.

Average-sized grantees spend an estimated 9 hours on each QPR, for a total of 2,412 hours completing four QPRs each year. Total annual QPR submissions cost an estimated \$83,938.

Full NDRC Phase 1 Application							
Description of Information Collection	Number of Respondents	Number of Responses	Total Number of Responses	Hours Per Response	Total Hours	Cost Per Response	Total Cost
Phase 1 Threshold Determination	67	1	67	37	2,479	\$1,288	\$86,269
Factor Narratives and Attachments	67	1	67	120	8,040	\$4,176	\$279,792
SF-424	67	0	0	0	0	\$0	\$0
SF-LLL	67	0	0	0	0	\$0	\$0
HUD-2880	67	1	67	4	268	\$96	\$25,835
HUD-96011	67	1	67	0.03	2	\$1	\$67
TOTAL PHASE 1 PAPERWORK BURDEN	67	4	268	161	10,789	\$5,561	\$391,963

Full NDRC Phase 2 Application							
Description of Information Collection	Number of Respondents**	Number of Responses	Total Number of Responses	Hours Per Response	Total Hours	Cost Per Response	Total Cost
Phase 2 Threshold Determination	67	1	69	35	2,415	\$1,218	\$84,042
Factor Narratives and Attachments	67	1	67	150	10,050	\$5,220	\$349,740
SF-424	67	0	0	0	0	\$0	\$0
SF-LLL	67	0	0	0	0	\$0	\$0
HUD-2880	67	1	67	4	268	\$96	\$25,835
HUD-96011	67	1	67	0.03	2	\$1	\$67
TOTAL PHASE 2 PAPERWORK BURDEN	67	4	270	189	12,735	\$6,535	\$459,684

*Based number of hours per response at GS-13 salary of \$34.80/hr.

** Maximum if all eligible Phase 1 Applicants apply and are invited to submit Phase 2 applications

CDBG-NDR Information Collection in DRGR								
	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							
	Published Action Plan	67	1	67	40	2680	\$1,392	\$93,264
	SF 424	67	1	67	1	67	\$35	\$2,345
	Procurement, Financial Controls and DOB documentation	67	1	67	6	402	\$209	\$14,003
	Performance and Financial Projections	67	1	67	8	536	\$278	\$18,626
	POST-AWARD							
	Grant Agreement (HUD 40092)	67	1	67	1	67	\$35	\$2,345
	Grantee's Written Agreements	67	1	67	5	335	\$174	\$11,658
	DRGR Activation, Activity Set-Up and Completion	67	1	67	10	670	\$348	\$23,316
	TOTAL PRE- AND POST-AWARD PAPERWORK BURDEN	67	7	469	71	4,757	\$2,471	\$165,557
	Description of Information Collection	Number of Respondents*	Number of Responses Per Year	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	67	4	268	9	2,412	\$313	\$83,884
	Average-sized grants online voucher submissions	67	19	1,273	0.22	280	\$8	\$10,184
	TOTAL ANNUAL REPORTING PAPERWORK BURDEN	67	23	1,541	9.22	14,208	\$349	\$537,809
	TOTAL CDBG-NDR PAPERWORK BURDEN (PRE- and POST-AWARD AND REPORTING)	67	30	2,010	N/A	18,965	N/A	\$703,366

* Maximum if all eligible Phase 1 Applicants apply and are invited to submit Phase 2 applications

**Based number of hours per response at GS-13 salary of \$34.80/hr.

13. Estimate of Total Costs to Respondents

There are no additional costs to the respondents (other than the cost shown in item 12 above).

14. Estimate of Annualized Cost to Federal Government

HUD estimates 45-day threshold review and subsequent Phase 1 and Phase 2 Application review to take 8, 15 and 20 hours respectively. The total annualized cost is estimated at \$100,259. This amount is based on 2,881 hours of review at a GS-13 salary of \$34.80/hr.

15. Explanation of Program Changes / Adjustments

This is a one-time solicitation that has not been undertaken before. As such, there are no changes/adjustments.

16. Publication of Results

HUD will publish the results of the Phase 1 and Phase 2 solicitations 60 days after each respective application deadline. Phase 1 applications will be due 180 days after NOFA publication and Phase 2 applications will be due 120 days after Phase 1 winners are announced and invited to submit Phase 2 applications.

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

The Office of Community Planning and Development is not seeking to not display the expiration date for OMB approval of the information collection.

18. Explanation of Each Exception to the Certification Statement

No exceptions are made to the certification statement identified in item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

B. This collection does not employ statistical methods.