Supporting Statement for Paperwork Reduction Act Submissions

CDBG – Disaster Recovery 2-year Expenditure Deadline Waiver Request under P.L. 113-2

A. Justification

1. Circumstances that make the collection of information necessary.

This information collection is being conducted by CPD Office of Block Grant Assistance to assist the Administrator of HUD in determining, as required by section 904(c) under Title IX of the Disaster Relief Appropriations Act, 2013 (Public Law 113-2, enacted January 29, 2013), whether to grant waivers of the twenty-four month expenditure deadline for grantees (Entitlement communities, States and units of general local governments) receiving funds under the Act.

2. How the information is used

The Office of Management and Budget authorized HUD to grant waivers of the expenditure deadline within certain parameters for grantee activities where it is impracticable for grantees to expend activity funds within the twenty-four month period and achieve program missions. The "CDBG-DR Expenditure Deadline Waiver Request Template (P.L. 113-2 Grantees Only)" will serve as a vehicle for standardizing the information submitted by grantees to HUD. The Department derived the majority of fields in this template from information required by OMB for the Department's request for authority to grant waivers. Due to the time-sensitive nature of the Department's review, the template will ensure grantees provide all the information necessary for the Department to evaluate an activity for a waiver in an expeditious manner.

3. Improved technology.

The template can be submitted to the HUD grant manager (either field office or Headquarters) electronically (via email) as long as the template is accompanied by a letter requesting the waiver with the grant official's authorized signature.

4. Efforts to identify duplication.

This information is not collected anywhere else, as it relates to a requirement unique to this supplemental disaster relief appropriations law.

5. Burden to small business or small entities.

There will be no impact on small businesses or other small entities. Only entitlements, States and units of local governments have received grants under P.L. 113-2.

6. Consequences if information is collected less frequently.

If this collection does not occur, the Department will have difficulty in collecting the information necessary to fairly review and approve waivers of the expenditure deadline for recovery activities in an expeditious manner. If the Department is unable to use this template, grantees may face the risk of not receiving a waiver for an activity and face the recapture of the CDBG-DR funds associated with the activity by the Department. Without standardizing the requested information, the Department may receive different information from grantees requesting waivers and may not be able to provide waivers fairly and in a timely manner.

7. Special circumstances

No other special circumstances would cause this information collection to be conducted in a manner that would impose one of the additional requirements identified under this item.

8. Public Notice.

HUD published a notice describing the Paperwork Reduction Act Submission in the Federal Register on December 23, 2014 for 30 days, and no comments were received.

9. Payment or gifts.

Not applicable. No payment or gifts are provided to any respondents for any information.

Signature of Senior Officer or Designee:

X Colette Pollard, Departmental Reports Management Officer, Office of the Chief Information Officer Date:

10. Assurance of Confidentiality

24 CFR 570.508 of the CDBG regulations states that grantees shall provide citizens with reasonable access to records regarding the past use of CDBG funds, consistent with applicable State and local laws regarding privacy and obligations of confidentiality.

11. Questions of a Sensitive Nature.

The information collection request does not include any sensitive questions.

12. Annual Reporting and Recordkeeping Burden

The following table demonstrates burden hours, established based on HUD's estimates of grantees requesting waivers of the expenditure deadlines. Based on the number of grantees that are expected to need extensions, HUD estimates 102 total responses, equaling a burden for grantees of 2,448 hours, and at an assumed rate of \$24.34** per hour, the total cost would be \$59,584.32. The hour burdens were estimated by past experience of HUD staff working with grantees on similar individual requests.

CDBG-DR 2- year Expenditure Deadline Waiver Request under P.L. 113-2							
Description of Information Collection	Number of Respondents	Number of Responses	Total Number of Responses	Hours Per Response	Total Hours	Cost Per Response	Total Cost
CDBG-DR Expenditure Deadline Waiver Request Template (P.L. 113-2 Grantees Only)	34	3	102	24	2,448	\$584.16	\$59,584.32
TOTAL PAPERWORK BURDEN	34	3	102	24	2,448	\$584.16	\$59,584.32

**GS 11, step 1 (2014 OPM tables)

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

It is estimated that HUD will receive 102 responses, and that it will take HUD staff 16 hours on average to review and complete each response.

102 (responses) x 8 (hours to review documentation) x 34.69^{**} (per hour) = 28,307.04 is the estimate of total cost to the Federal government to complete the expenditure waiver review.

**GS 13, step 1 (2014 OPM tables)

15. Explanation of Program Changes / Adjustments

There are no program changes or adjustments being reported.

16. Publication of Results

The information collected is not for statistical purposes and does not use statistical methods. Individual extension approvals will be published in the Federal Register and will include information identifying the activity(ies) for which an extension is being granted, the date of the new deadline, and the amount of funds subject to the extension. The template data will not be published.

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

The Office of Community Planning and Development is <u>not</u> 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.