

## Supporting Statement for Paperwork Reduction Act Submissions

### A. Justification

#### 1. Why is the information necessary?

In June of 2013, President Obama issued a Climate Action Plan (CAP) that is comprised of actions to reduce the amount of energy consumed and greenhouse gases emitted by Americans. As part of the CAP, the Treasury Department, USDA, and HUD have been charged with installing 100 megawatts of renewable energy capacity by 2020 within federally assisted housing stock. HUD currently does not collect the necessary information to support an initiative of this kind.

Currently, there is no vehicle available to allow program partners to make a public commitment toward the Administration's Federal Renewable Energy Target. For owners or managers of federally assisted housing (including Public Housing Authorities) to make a pledge, they must provide the amount of on-site capacity they have already installed or intend to install by 2020. The information collected will make these organizations eligible for technical assistance funds.

#### 2. What information is to be collected?

Organization information, the type of federally assisted properties that organization owns/manages, the type and amount of renewable energy the organization intends to install or has already installed, and who the renewable energy will serve.

From whom?

Organizations (owners or managers of federally assisted housing) contact that make a voluntary public commitment to the Administration's Federal Renewable Energy Target.

How is it collected?

The form will be available for download on the HUD Exchange Renewable Energy website, and can be submitted electronically.

How will the information be used; for what purpose and by whom.

The information will be used by HUD to track progress towards the Administration's goal of 100 mW of on-site renewable energy on federally-assisted rental housing by 2020. Submission of this information will also make organizations eligible to receive HUD Community Compass technical assistance to develop and/or implement renewable energy projects.

How has it been used in the past?

n/a

#### 3. Is the information submitted electronically? If not, why?

Yes, the information is submitted electronically.

Will it ultimately be managed in an automated system? Identify the system.

The information will be collected in an excel document or other computerized database after electronic submission.

Describe whether, and to what extent, the collection of information is automated (item 13b1 of OMB form 83-i).

The form will be hosted on a website (described above) and submitted electronically. Manual electronic submission is required yearly for voluntary participants.

Under the Government Paperwork Elimination Act (GPEA), the public must be provided with the option of responding electronically. If that is not feasible, explain why. This must be addressed.

The public is provided with the option of responding electronically.

4. Is this information collected elsewhere? Review current information collection packages for potential consolidation.

The HUD PD&R survey (OMB Control No. 2528-0301) collects information about existing installations, but does not inquire about future targets.

5. Does the collection of information impact small businesses or other small entities (item 5 of OMB form 83-i)? Describe any methods used to minimize burden.

This form does not impose a significant burden on small entities.

6. Why can't the information be collected less frequently – or not at all?

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

The collection is necessary to track the progress of the Administration's Federal Renewable Energy Target. The initial commitment form is required only once.

7. Explain any special circumstances requiring:

- response more than quarterly;
- response in fewer than 30 days;
- more than an original and two copies of any document;
- retain records for more than three years (*other than health, medical, government contract, grant-in-aid, or tax records*);
- statistical surveys not designed to produce results that can be generalized to the universe of study;
- statistical data classification not been approved by OMB;
- a pledge of confidentiality that is not supported by 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
- respondents to submit proprietary trade secret, or other confidential information.

There are no circumstances requiring deviation from 5 CFR 1230.6.

8. Date and page number of the *Federal Register* notice (provide a copy) soliciting comments and public input. Summarize any public comments and describe response to comments. Describe all efforts to consult with persons outside the agency to obtain their input.

Published in the federal register on June 22, 2015, page 35667; vol 80, no comments have been received

9. Explain any payments or gifts to respondents, other than remuneration of contractors or grantees.

This information collection does not involve any payments or gifts to respondents.

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

The form does not request any confidential information from eligible organizations.

11. Justify any questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private.

The form does not request information of a sensitive nature.

12. Estimate public burden:

$$\begin{array}{ccccccc} \text{Number of Respondents} & \times & \text{Annual Response} & \times & \text{Hours per Response} & = & \text{Burden Hours} \\ 50 & & 1 & & .5 & & 25 \end{array}$$

Read the complete instructions on the form 83i. **Explain how the burden was estimated.** Generally estimates should not include burden hours for customary and usual business practices;

- if this collection uses more than one form, provide **separate estimates for each form** and aggregate the hour burdens in item 13 of OMB Form 83i; and
- 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 13.

We estimate that approximately 50 organizations will complete this form once, with a progress check annually until 2020. We estimate that this form should take no more than 30 minutes to complete.

13. Estimate of the average, annual cost beyond the cost of hour burden shown in Items 12. Read the complete instructions on the form 83i.

This information collection does not result in any additional cost burden to respondents.

14. Estimate annualized costs to HUD of collecting the information, including processing the information.

There will not be any additional cost to the Federal Government as a result of this information collection beyond the usual personnel costs to verify eligibility and track commitments.

15. Explain any program changes or adjustments reported in items 13 and 14 of the OMB Form 83i.

Also explain any other changes/revisions to the information collection.

There is no anticipated change in burden, this is a new collection.

16. If the information will be published, outline plans for tabulation and publication.

Unless requested otherwise, responding organizations' commitments may be highlighted in public announcements, which may include the organization name and the amount of renewable energy commitments pledged.

17. Explain any request to not display the expiration date.

This information collection is not seeking approval to not display the expiration date for OMB approval of the information collection.

18. Explain each exception to the certification statement identified in item 83i-19.

This includes, specifically, providing the required information to respondents:

- The OMB control number and expiration date;
- Why the information is being collected;
- Use of the information;
- Burden estimate;
- Nature of response (voluntary, required for a benefit, or mandatory);
- Nature and extent of confidentiality; and
- The requirement to display currently valid OMB control number.

Even if no forms are used to collect the information, respondents must be provided this information.  
Be prepared to explain how this requirement is met.

There are no exceptions to the certification statement identified in Item 19 of OMB Form 83-1.