

**Supporting Statement for Paperwork Reduction Act Submissions  
(Disaster Recovery Grant Reporting System)  
(OMB# 2506-0165)**

**A. Justification**

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

*a. CDBG Disaster Recovery (CDBG-DR)*

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 Southern Floods supplemental appropriation (P. L. 114-113) provides funding for disaster recovery efforts resulting from major floods in South Carolina and Texas. The appropriation directs the Department to address these efforts in areas of greatest unmet need. The Department has added seven new grants under P. L. 114-113 to the portfolio currently overseen by the Disaster Recovery and Special Issues Division in the Office of Block Grant Assistance. In addition, 13 new grants were awarded for National Disaster Resilience (NDR) under P. L. 113-2, bringing the total number of grants awarded to 47 under the P. L. 113-2 appropriation. These revisions update the previously approved DRGR PRA information collection to account for the increase in burden hours associated with these new CDBG-DR grants.

Congress has appropriated funds for CDBG disaster recovery since September 18, 2001. CDBG-DR statutes are located here: <https://www.hudexchange.info/cdbg-dr/cdbg-dr-laws-regulations-and-federal-register-notices/>

*b. Neighborhood Stabilization Program (NSP1, NSP2 & NSP3)*

The Neighborhood Stabilization Program (NSP) was established for the purpose of stabilizing communities that have suffered from foreclosures and property abandonment. On July 21, 2010, President Obama signed the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank Act”) into law (Public Law 111-203). This law provides \$1 billion of formula grant funding for the redevelopment of foreclosed upon and abandoned homes to be allocated under the terms of Title XII, Division A, Section 2 of the American Recovery and Reinvestment Act (“Recovery Act”) and by the formula factors provided in Title III of Division B of the Housing and Economic Recovery Act of 2008 (Public Law 110-289) (“HERA”). In 2008, HERA provided for an initial round of formula funding to regular State and entitlement Community Development Block Grant (“CDBG”) grantees through the Neighborhood Stabilization Program (“NSP1”). The Recovery Act provided for a neighborhood stabilization grant competition open to state and local governments, as well as non-profit groups and consortia that may include for-profit entities (“NSP2”). The Dodd-Frank Act is the third round of Neighborhood Stabilization Funding (“NSP3”).

Although NSP funds are otherwise to be considered CDBG funds, HERA, the Recovery Act and the Dodd-Frank Act make substantive revisions to the eligibility, use, and method of distribution of NSP3 funds. For NSP1 and NSP3, grantees are required to submit substantial amendments to their consolidated plans to secure funding they are entitled to under the formulas.

The applicable section of the Dodd-Frank Act, Recovery Act and HERA are attached to this submission. These statutes, along with the Housing and Community Development Act of 1974, mandate and/or authorize the collection of data in this submission. NSP statutes are located here: <https://www.hudexchange.info/nsp/nsp-laws-regulations-and-federal-register-notices/>

*c. NSP3 Technical Assistance Grants*

Authorized under the section 1497 of the Wall Street Reform and Consumer Protection Act of 2010 (Pub. L. 111-203, approved July 21, 2010) (“NSP3”), NSP3 Technical Assistance (TA) provides \$20 million to organizations that are experienced and successful in providing program, technical, planning, financial, and organizational capacity building assistance, or consulting in such areas as community development, affordable housing, organizational management, financing and underwriting, construction and rehabilitation management, landbanking, project management and strategic planning. NSP3-TA follows these key objectives: (1) improve grantees' ability to assess conditions in the affordable segment of their local housing market consistent with the jurisdiction's Consolidated Plan and Analysis of Impediments; (2) improve grantees' ability to design and appropriately implement neighborhood stabilization programs based upon an accurate assessment of the affordable segment of their local housing market; (3) increase organizational capacity to leverage private and public dollars; and (4) improve grantees understanding of and compliance with statutory and regulatory requirements. Teams of providers with a broad range of complementary skills and expertise, working collaboratively, were selected through a competitive process.

*d. Rural Capacity Building and Section 4 programs*

Rural Capacity Building for Community Development and Affordable Housing: Through the funding of national organizations with expertise in rural housing and community development, the Rural Capacity Building (RCB) Program enhances the capacity and ability of local governments, Indian tribes, housing development organizations, rural Community Development Corporations (CDCs), and rural Community Housing Development Organizations (CHDOs), to carry out community development and affordable housing activities that benefit low- and moderate-income families and persons in rural areas.

Funds may be used under the RCB program to provide capacity building support across the following three eligible activity categories:

1. Training, education, support, and advice to enhance the technical and administrative capabilities of rural housing development organizations, CDCs, CHDOs, local governments, and Indian tribes, including the capacity to participate in consolidated planning, as well as in fair housing planning and Continuum of Care homeless assistance efforts that help ensure community-wide participation in assessing area needs; consulting broadly within the community; cooperatively planning for the use of available resources in a comprehensive and holistic manner; and assisting in evaluating performance under these community efforts and in linking plans with neighboring communities in order to foster regional planning;
2. Loans, pass-through grants, development assistance, predevelopment assistance, or other financial assistance to rural housing organizations, CDCs, CHDOs, local governments, and Indian tribes to carry-out community development and affordable housing activities that benefit low-income or low- and moderate-income families and persons, including the acquisition, construction, or rehabilitation of housing for low-income or low- and moderate-income families and persons, and community and economic development activities that create jobs for low-income persons; and;
3. Such other activities as may be determined by the grantees in consultation with the Secretary or his or her designee.

The original authorizing statute for the RCB program is the Consolidated and Further Continuing Appropriations Act, 2012, Pub. L. 112-55. The statute link is <http://uscode.house.gov/statutes/pl/112/55.pdf>.

Section 4: The Capacity Building for Affordable Housing and Community Development Program, also known as the Section 4 program, was originally authorized under Section 4 of the HUD Demonstration Act of 1993 (Pub. L. 103-120, 107 Stat. 1148, 42 U.S.C. 9816 note), as amended. The program enhances the capacity and ability of community development corporations (CDCs) and community housing development organizations (CHDOs) to carry out community development and affordable housing activities that benefit low-income persons. The Section 4 program allows for the same three eligible activity categories detailed above for the RCB program.

The authorizing legislation and amendments list five eligible grantees: The National Community Development Initiative (now called Living Cities), Local Initiatives Support Corporation (LISC), The Enterprise Foundation (now called Enterprise Community Partners), Habitat for Humanity International (Habitat) and YouthBuild USA. In recent appropriation acts, Congress has limited the number of eligible grantees to LISC, Habitat and Enterprise Community Partners.

The original authorizing statute for the Section 4 program is HUD Demonstration Act of 1993, Section 4, Public Law 103-120, 107 Stat. 1148, 42 U.S.C 9816 note. The statute link is <http://uscode.house.gov/statutes/pl/103/120.pdf>.

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

*a. CDBG Disaster Recovery*

Grantees (cities, counties, and states that have received program grants) describe their recovery needs, develop action plans, drawdown funds, report performance, and submit the information to their assigned HUD office for formal review. 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 HQ can work with the data to produce required reports to Congress. HUD HQ uses this data for program management purposes such as risk analysis, remote monitoring, and to respond to inquiries.

*b. Neighborhood Stabilization Program*

The respondents are formula grantees (states and units of local governments) under NSP1 and NSP3 and competitively selected grantees under NSP2 and NSP-TA. To comply with regulations, NSP1 and NSP3 grantees must submit substantial amendments to their annual action plans or abbreviated plans to receive NSP funds. Substantial amendments will be reviewed by HUD for compliance with requirements set forth in the combined NSP formula notice.

HUD requires all NSP grantees to collect information on the activities undertaken with NSP funds. HUD collects this information from recipients through the Disaster Recovery Grant Reporting System (DRGR). HUD Headquarters will use the information collected through DRGR to track compliance with NSP's statutory commitment and expenditure requirements and to generate the OMB prescribed quarterly reports. Program management reports are generated by DRGR to provide data on the status of each NSP recipients' commitment and disbursement of NSP funds. For NSP2, HUD will use this data to compile quarterly and annual reports to be posted on [www.recovery.gov](http://www.recovery.gov) and [www.hud.gov/recovery/](http://www.hud.gov/recovery/). HUD HQ uses DRGR data for program management purposes such as risk analysis, remote monitoring, and to respond to inquiries.

c. *Neighborhood Stabilization 3 - Technical Assistance*

NSP3-TA awardees are competitively selected. Non recurring pre-award information collections include applications and accompanying material. Post-award documentation includes the sub-grant award and executive compensation information as required by the Federal Funding Accountability and Transparency Act of 2006 (Public Law 109-282), and grant agreements. NSP TA awardees will be required to report to the Government Technical Representatives no less than quarterly unless otherwise specified in the cooperative agreement. As part of this required report to HUD, award recipients will update the Disaster Recovery Grant Reporting (DRGR) system with actual outputs and data related to outcomes achieved, and a narrative explanation of any disparity between projected and actual results. HUD Headquarters will use the information collected through DRGR to track compliance by the technical assistance providers with NSP TA's statutory commitment and expenditure requirements, and with the goals of technical assistance stated in the NSP TA Notice of Funding Availability [Docket No. FR-5499-N-01].

d. *Rural Capacity Building and Section 4 programs*

Grantees (national housing and community development non-profits) describe the capacity building needs of proposed beneficiaries, develop action plans, drawdown funds, report performance, and submit the information to their assigned HUD office for formal review. 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 HQ can work with the data to produce required reports to Congress. HUD HQ uses this data for program management purposes such as risk analysis, monitoring, and to respond to inquiries.

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

Yes, the information is submitted electronically.

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

No, the information is not collected elsewhere.

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

While some small communities have received CDBG disaster recovery grants, the economic impact of this information collection effort should be small. Currently, active CDBG DR and NSP grantee users are mostly state, local, or tribal governments. Some non-profit NSP2 grantees and

approximately ten NSP technical assistance providers also use DRGR for reporting and draw down of funds.

6. 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. For disaster recovery and NSP2, 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.

For NSP1 and NSP3, HUD considered configuring DRGR for less frequent reporting but concluded that the risks of not maintaining up to date program information were too high in regards to program performance and possible fund recapture.

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 than quarterly; **N/A**
  - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; **N/A**
  - requiring respondents to submit more than an original and two copies of any document; **N/A**
  - requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years; **N/A**
  - in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study; **N/A**
  - requiring the use of a statistical data classification that has not been reviewed and approved by OMB; **N/A**
  - 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 **N/A**
  - requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law. **N/A**

There are no special circumstances that require: responses 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; statistical surveys not designed to produce results than 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.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.
- Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported.
  - Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.

Published in the Federal Register on September 21, 2016; FR-5910-N-15 (p.64964). No comments were received.

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

No payment or gift is provided to respondents.

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

This issue does not pertain to the data stored in DRGR. However, access to the system is restricted to ensure that only authorized users are entering 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. 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.

None

12. Provide estimates of the hour burden of the collection of information. The statement should:
- indicate 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 burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices;

- if this request covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I; 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.

*a. Disaster Recovery*

- The system has approximately 114 open CDBG-DR grants in DRGR, including all grants awarded under P. L. 114-113 and P. L. 113-2. The summary information and table below include both one-time only and recurring submission reporting burden calculations.
- The calculation of cost burden for CDBG-DR grantees takes into account the size of the grantee based on amount of funds received. Grantees have been divided between average-sized (less than \$100M) and large (over \$100M).
- HUD requires each grantee to report their performances to the system quarterly. Some grantees have more than one open grant under different appropriation rules. Such a grantee must make one submission per grant per quarter.
- 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,
- 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 16. A copy of the estimation calculation worksheet is attached.
- Cost figures are estimated based on local staff earning the equivalent of a GS-11 hourly rate.
- All numbers are rounded to the nearest dollar.

One-time only submissions:

The one-time only pre- and post-award submissions for the 20 new DRSI grants awarded under P. L. 114-113 and P. L. 113-2 include standard forms, DRGR Action Plan, and required financial control documentation. Total hours are estimated at 905 at a cost of \$22,625.

CDBG-DR								
	Description of Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Non-	PRE-AWARD							



<b>recurring</b>	<b>SUBMISSION REQUIREMENTS</b>								
	Published Action Plan	7	1	7	40	280	\$25.00	\$7,000.00	
	SF 424	0	0	0	0	0	\$0.00	\$0.00	
	Procurement, Financial Controls and DOB documentation	7	1	7	6	42	\$25.00	\$1,050.00	
	Performance and Financial Projections	7	1	7	8	56	\$25.00	\$1,400.00	
	<b>POST-AWARD</b>								
	Grant Agreement (HUD 40092)	20	1	20	1	20	\$25.00	\$500.00	
	Grantee's Written Agreements	20	1	20	5	100	\$25.00	\$2,500.00	
	DRGR Activation, Activity Set-Up and Completion	20	1	20	20	400	\$25.00	\$10,000.00	
	<b>Description of Information Collection</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Responses Per Annum</b>	<b>Burden Hour Per Response</b>	<b>Annual Burden Hours</b>	<b>Hourly Cost Per Response</b>	<b>Annual Cost</b>	
	<b>REPORTING (Annual)</b>								
<b>Recurring</b>	Average Sized Grants Online Quarterly Reporting via DRGR	87	4	348	9	3,132	\$25.00	\$78,300.00	
	Large Grants Online Quarterly Reporting via DRGR	27	4	108	57	6,156	\$25.00	\$153,900.00	
	Average-sized grants online voucher submissions	87	61	5,307	0.22	1,168	\$25.00	\$29,189.00	
	Large-sized grants online voucher submission	27	947	25,569	0.37	9,460.53	\$25.00	\$236,513.25	
	<b>TOTAL PAPERWORK BURDEN</b>	<b>309</b>	<b>--</b>	<b>31,413</b>	<b>--</b>	<b>20,814.07</b>	<b>\$25.00</b>	<b>\$520,351.75</b>	

Recurring submissions:

Recurring submissions include quarterly progress reports and voucher submissions. For average-sized grants, the Department estimates 13 minutes (.22 hours) needed per voucher. CDBG-DR grantees process approximately 61 vouchers per year. This requires a record keeping and reporting burden of approximately 13 hours per grantee, per year (61 vouchers x .22 hours = 13 hours). Larger CDBG-DR grantees take approximately 22 minutes (.37 hours) for each voucher and submit an average of 947 vouchers per year, resulting in approximately 350 burden hours per year, per grantee (947 vouchers x .37 hours = 350 hours). Therefore, all CDBG-DR grantees

collectively spend an estimated 10,629 hours (1,168 + 9,461) submitting vouchers in the DRGR system for a total estimated annual voucher submission cost of \$265,702 (\$29,189 + \$236,513).

Average-sized grantees spend an estimated 9 hours on each QPR, for a total of 3,132 hours. Large grantees spend an estimated 57 hours per QPR for a total of 6,156 hours. Therefore, all grantees collectively spend an estimated 9,288 hours (3,132 + 6,156) per year submitting QPR data in DRGR. Total annual QPR submissions cost an estimated \$232,200 (\$78,300 + \$153,900).

*b. Neighborhood Stabilization Program*

- There are currently 617 open NSP grants in DRGR. The following table demonstrates the estimated paperwork burden for recurring submissions.
- HUD requires each grantee to report their performances to the system quarterly. Some grantees have more than one open grant under different appropriation rules. Such a grantee must make one submission per grant per quarter.
- 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,
- 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 16. A copy of the estimation calculation worksheet is attached.
- Cost figures are estimated based on local staff earning the equivalent of a GS-11 hourly rate.
- All numbers are rounded to the nearest dollar.

Recurring submissions:

For the 617 open NSP grants in the DRGR system, the Department estimates 11 minutes per voucher submission. NSP grantees process approximately 38 vouchers per year. This requires a record keeping and reporting burden of approximately 4,220 hours for an annual voucher submission cost of \$105,507.

NSP grantees spend an estimated 4 hours per QPR submission, for a total of 9,872 hours for a total annual QPR submission costs \$246,800.

	Description of Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
<b>Recurring</b>	<b>REPORTING (Annual)</b>							
	Online Quarterly Reporting via DRGR	617	4	2,468	4.00	9,872.00	\$25.00	\$246,800.00
	DRGR voucher submissions	617	38	23,446	0.18	4,220.28	\$25.00	\$105,507.00
	<b>TOTAL PAPERWORK BURDEN</b>	<b>1,234</b>	<b>42</b>	<b>25,914</b>	<b>4.18</b>	<b>14,092.28</b>	<b>\$25.00</b>	<b>\$352,307.00</b>

c. *NSP3 Technical Assistance Grants*

- There are currently 12 open NSP3-TA grant in DRGR. The following table demonstrates the estimated paperwork burden for recurring submissions.
- Submissions include work plans and drawdown vouchers. Each TA providers enters approximately five TA work plans per year and 38 drawdown vouchers per year.
- Cost figures are estimated based on local staff earning the equivalent of a GS-11 hourly rate.
- All numbers are rounded to the nearest dollar.

For the 12 NSP3-TA average-sized grants, the Department estimates TA providers enter five work plans per year at eight hours per TA work plan for a total of 480 hours over the course of a year. Total annual QPR submission costs approximately \$12,000.

For the 12 NSP3-TA average-sized grants, the Department estimates 11 minutes per voucher. Grantees process approximately 38 vouchers per year. Total burden hours for all grantees over the course of the year is estimated at 456, for a total annual submission cost of \$2,052.

<b>Neighborhood Stabilization Program 3 - Technical Assistance</b>								
	Description of Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
<b>Recurring</b>	TA work plan submissions	12	5	60	8.00	480	\$25.00	\$12,000.00
	DRGR voucher submissions	12	38	456	0.18	82	\$25.00	\$2,052.00
	<b>TOTAL PAPERWORK BURDEN</b>	<b>12</b>	<b>43</b>	<b>516</b>	<b>8.18</b>	<b>562</b>	<b>\$25.00</b>	<b>\$14,052.00</b>

e. *Rural Capacity Building and Section 4 programs*

- The system has 16 open grants in DRGR including all projected grants to be awarded through the FY2016 RCB and Section 4 NOFAs.
- HUD requires each RCB and Section 4 grantee to report their performances to the system semi-annually for each grant award.
- Submissions include drawdown vouchers and semi-annual performance reports (in the QPR Module). There may be multiple line items included in each voucher and several activities reported on within a QPR. Drawdown vouchers are usually submitted on a monthly basis.,
- Since these grantees are National Non-Profits and often staffed by mid-career individuals, the cost figures are estimated based on local staff earning the equivalent of a GS-13 base hourly rate.
- All numbers are rounded to the nearest dollar.

One-time only submissions:

The one-time non-recurring submissions include DRGR activation and account setup, plus creation of the original Action Plan. Total hours are estimated at 112 at a cost of \$3,920.

Recurring submissions:

Rural Capacity Building and Section 4								
	Description of Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Non-recurring	DRGR Activation and Account Setup	8	1	8	2.00	16	\$35.00	\$560.00
	Action Plan Setup and Submission	8	1	8	12.00	96	\$35.00	\$3,360.00
	Description of Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Recurring	Action Plan Revisions	16	2	32	0.50	16	\$35.00	\$560.00
	Semi-Annual Report Submission	16	2	32	8.00	256	\$35.00	\$8,960.00
	Voucher Submission	16	12	192	0.25	48	\$35.00	\$1,680.00
	<b>TOTAL PAPERWORK BURDEN</b>	<b>64</b>	<b>18</b>	<b>272</b>	<b>22.75</b>	<b>432</b>	<b>\$35.00</b>	<b>\$15,120.00</b>

Grantees have shown a need to revise their Action Plans to provide implementation updates prior to semi-annual report submission. The Department estimates that each Action Plan revision will take 30 minutes and will occur two times a year. Grantees are estimated to spend 16 hours per year on Action Plan revisions. The Total costs for all grantees for Action Plan revisions is \$560.

Recurring submissions include semi-annual progress reports and voucher submissions. For grantees, the Department estimates 15 minutes needed per voucher with grantees processing approximately 12 vouchers per year. This requires a record keeping and reporting burden of approximately 3 hours per grantee, per year. Therefore, all grantees collectively spend an estimated 48 hours submitting vouchers in the DRGR system for a total estimated annual voucher submission cost of \$1,680.

Grantees spend an estimated 8 hours on each semi-annual report, for a total of 256 hours. Total annual semi-annual report submissions cost an estimated \$8,960.

f. *Total burden hours*

The following table summarizes the total burden hours required across programs and estimated costs related to this collection.

	Number of Respondents	Frequency of Response	Responses Per Annum <sup>1</sup>	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
<b>TOTAL PAPERWORK BURDEN</b>	1,631	1,125	58,115	N/A	35,900.35	Varies	\$901,830.75

1. The sum of total responses per annum from the four programs in this collection: 31,413 + 25,914+516+272=58,115.

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 cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;
  - If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
  - generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The Disaster Recovery Grant Reporting (DRGR) system does not have any additional costs associated with this collection.

14. Provide estimates of 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), and 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 in a single table.

*a. Disaster Recovery, NSP, and NSP3-TA*

The hourly rate by which the cost is calculated and rounded to the nearest dollar is \$30/hr (GS-12). The total cost to the government for working with the data is estimated to total approximately \$1,135,683 based on 37,856 hours. System development and maintenance costs are not included in these estimates.

*b. Rural Capacity Building and Section 4 programs*

The hourly rate by which the cost is calculated is \$30/hr. The total cost to the government for working with the data is estimated to total approximately \$45,000 based on 150 hours. System development and maintenance costs are not included in these estimates.

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

- 20 new CDBG-DR grants have been added to the system since the last PRA submission.
- 18 new NSP grants have been added to the system since the last PRA submission.
- 2 new TA grants have been added to the system since the last PRA submission.
- 8 new Rural Capacity Building and Section 4 grants have been added to the system since the last PRA submission.

The DRGR system is updated regularly (at least once per year). A description of DRGR updates are located here: <https://www.hudexchange.info/programs/drgr/>. Reporting requirements are expected to be substantively the same.

16. For collection of information whose results will be published, outline plans for tabulation 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.

Each quarter HUD prepares reports from the data system that highlights the uses of funds and accomplishments of grantees. A synthesis of these reports is presented to Congress.

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.

HUD is not seeking approval to not display the expiration date for OMB approval.

18. Explain each exception to the certification statement identified in item 19.  
No exceptions are requested.

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**B. Collections of Information Employing Statistical Methods**