Supporting Statement for Paperwork Reduction Act Submissions
Semi-Annual Labor Standards Enforcement Report
Local Contracting Agencies (HUD Programs)
(OMB #2501-0019)

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.

   All Federal agencies administering programs subject to Davis-Bacon wage provisions are required by Department of Labor (DOL) regulations (29 CFR Part 5, Section 5.7(b)) to submit a report of all new covered contracts/projects and all enforcement activities each six months. In order for HUD to comply with this requirement, it must collect contract and enforcement information from state and local agencies that administer HUD-assisted programs subject to Davis-Bacon requirements. HUD requires that such agencies complete and submit a Semi-annual Labor Standards Enforcement Report each six months. Respondents and HUD must retain a copy of the Semi-annual Labor Standards Enforcement Report in their files for at least 3 years.

   This collection is not related to the Patient Protection and Affordable Care Act (PPACA, PL 111-148 and 111-152) or Affordable Care Act.

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.

   The information collected is used by HUD to compile a report to DOL required by DOL regulations at 29 CFR 5.7(b). HUD consolidates the data collected from respondents and submits the data to DOL in its report.

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.

   The information collection form (HUD-4710) is available on-line in a Word-fillable format and may be transmitted to HUD 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.

   The information that will be collected from respondents is not available to HUD from existing data sources.

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

   The information collection does not adversely impact small businesses or other small entities.

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.

   HUD would be in violation of DOL regulations relating to semi-annual reporting requirements governing all Federal agencies administering programs subject to Davis-Bacon prevailing wage rates.

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;
     requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

     Not applicable

   - requiring respondents to submit more than an original and two copies of any document;
     requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

     Not applicable

   - 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;

     Not applicable

   - requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

     Not applicable

   - 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

Not applicable

- 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.

  Not. applicable

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.

   The agency's notice announcing this collection of information appeared in the Federal Register on Friday, December 9, 2016, (Volume 81, Page 89128). No comments were received.

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

   There are no 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.

    There is no assurance of confidentiality provided to respondents.

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.

    There are no questions of a sensitive nature related to this information collection.

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.

Estimated Burden Hours and Cost to Respondents

Estimated Number of Respondents:	4,500.00
Frequency of Response (per annum):	2
Total Number of Responses:	9,000.00
Burden Hours per Response (including Recordkeeping):	2
Total Annual Burden Hours:	18,000.00
*Cost per Hour:	$35.74
Total Annual Cost:	$643,320.00

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Semi-Annual Labor Standards Enforcement Report - Local Contracting Agencies (HUD Programs) HUD4710 & HUD4710-i	**4,500**	**2**	**9,000**	**2**	**18,000**	**$35.74**	**$643,320.00**
Total	**4,500**	**2**	**9,000**	**2**	**18,000**	**$35.74**	**$643,320.00**

***Estimated cost based on GS-13, Step 1, hourly base rate.**

13. Provide an estimate of the total annual cost burden to respondents or record keepers 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 I, 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.

There are no additional capital or start-up costs. There are no total operation and maintenance purchases of service components required for collecting this information.

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.

Number of Respondents:	9,000.00
Staff Hours per Response:	.25
Total Annual Burden:	2,250.00
*Cost per Hour:	$35.74
Total Annual Cost:	$80,415.00

*Estimated cost based on GS-13, Step 1, hourly rate.

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

This is an extension of a currently approved collection, the hourly rate changed to reflect the 2017 current pay scale.

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.

The information gathered from this collection will not be published by HUD.

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 avoid displaying the expiration date for this information collection.

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

There are no exceptions to the Certification Statement identified in item 19 of the OMB 83-1. The certification provisions identified in items a through j have been satisfied within this supporting statement; therefore, there are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

There are no statistical methods used in this collection.