

Supporting Statement for Paperwork Reduction Act Submissions Line of Credit System Request (LOCCS)/eLOCCS (2577-0166)

A. Justification

1. **Why is this 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/authorizing the collection of information.**

The Line of Credit Control System Request (LOCCS/eLOCCS) is authorized under Sections 102 & 103 of the HUD Reform Act of 1989. The act and was enacted to ensure accountability, transparency, and a level playing field in the grants process at the Department. This information collection is necessary to request payment of grant funds or designate an appropriate official. This This package provides a means for Grant recipients to receive payments. LOCCS is HUD's primary grant and subsidy disbursement system for the most of HUD programs. Organizations and individuals have access to these grants through an internet version of LOCCS called eLOCCS, where authorized Business Partners can access, manage, and drawdown grant funds.

The Business Partner Registration and Secure Systems Registration are independent of LOCCS 27054E Registration. However, the user needs a Secure System ID in order to complete the HUD-27054E for and registration. LOCCS is HUD's primary vehicle for grant recipients to achieving HUD program funds through the approval of HUD-27054E LOCCS. Grantees (all new or reinstated user who need to access eLOCCS) will need to complete the LOCCS HUD-27054E form, have it notarized, send the original HUD-27054E LOCCS Access Authorization form (with the original signature and notary seal) via U.S. Mail to the Program Office for review. This ensures that payments are made in a timely manner, but not in excess of the grant recipient's cash needs. By responding quickly to a grantee's payment needs, grantees will not request funds in excess, or advance, of their required program outlays.

2. How is this information to be used?

Grantees have access to their profile, which is accessed from the eLOCCS Main Menu. This profile displays Business Partner address, phone, user email, approving official information, HUD-27054E authorization and Secure Systems roles. The payment Voucher Selection screen, which is accessed from the Main Menu, allows the grantee to draw down on a voucher by putting a check mark in the box next to the grant number of selection. eLOCCS is implementing Single Sign-On solution under Secure Systems, where Grant recipients will be recognized and authenticated based on a Secure System ID, and will no longer separately Sign-in to eLOCCS.

HUD-27054E LOCCS Access Authorized Form: <http://portal.hud.gov/hudportal/documents/huddoc?id=27054E.pdf>

3. **Describe whether, and to what extent, the collection of information is automated (item 13b1 of OMB form 83-i). Also, describe any consideration of using information technology to reduce burden.**

External Business Partners and Grantees access LOCCS through an internet version called eLOCCS which provides the grantee with a fast, reliable method to request/obtain grant funds.

4. Is this information collected elsewhere? If so, why cannot any similar information already available be used or modified.

There will be no duplication of information. There is no similar information already available, which could be used or modified for this purpose.

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.**

There is no impact to 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.**

The information is provided by the grantees prior to drawdown of grant funds. If this information were not provided, grantees could not access LOCCS and obtain grant funds to implement various programs for which Congress has appropriated Federal dollars.

7. Explain any special circumstances that would cause an information to be collected in a manner:

- requiring respondents to report information to the agency more than quarterly;
Not Applicable
- 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;
Not Applicable
- 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 the study;
Not Applicable
- requiring the use of 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. respondents to report information more than Identify the date and page number of the *Federal Register* notice (and provide a copy) soliciting comments on the information. Summarize public comments and describe actions taken by the agency in response to these comments. Describe all efforts to consult with persons outside the agency to obtain their views.

HUD published a Notice of Proposed Information Collection for Public Comments in the *Federal Register*, Volume 82; No. 116; Page 27859, on June 19, 2017. The public was given until August 18, 2017, to submit comments on the proposed information collection. HUD received no comments on this proposed collection.

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

A Privacy Act Statement is included on each information collection instrument to assure confidentiality in collecting this information. This payment system will require that the latest security features be installed to deter fraudulent payments. Only a limited number of authorized officials will have access to the system for updating purposes.

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

No sensitive questions are asked.

12. **Estimate public burden: number of respondents, frequency of response, annual hour burden. 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.**

The total number of respondents for all forms included in this collection is 7,685. This represents the number of PHAs, tribes, TDHEs (tribally designated housing entities), non-profit organizations and other non-PHA entities receiving funds under Office of Public and Indian Housing programs. Many of these respondents are represented in multiple program categories and have multiple grants within each program area.

Information Collection	Number of Respondents	Frequency of Responses (drawdowns annually per program)	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost per Response	Annual Cost
Capital Fund 50080-CFP	3,100.00	15.00	46,500.00	.25 hours	11,625.00	26.26	305,272.50
Operating Fund 50080-OFND	3,100.00	12.00	37,200.00	.25 hours	9,300.00	26.26	244,218.00
Resident Opportunities and Supportive Services (ROSS) SC 50080-SC	330.00	12.00	3,960.00	.25 hours	990.00	26.26	25,997.40
Public Housing Technical Assistance 50080-PHTA	12.00	12.00	144.00	.25 hours	36.00	26.26	945.36
Hope VI 50080-URP	50.00	12.00	600.00	1 hour	600.00	26.26	15,756.00
Family Self-Sufficiency 50080-FSS	700.00	12.00	8,400.00	.25 hours	2,100.00	26.26	55,146.00

Indian Housing Block Grant 50080-IHBG	361.00	12.00	4,332.00	.25 hours	1,083.00	26.26	28,439.58
Traditional Indian Housing Development 50080-TIHD	32.00	12.00	384.00	.25 hours	96.00	26.26	2,520.96
	7,685.00		101,520.00		25,830.00		678,295.80

***Frequency of Responses is the total number of AMPs (7,100) multiplied by the total annual drawdowns (12 months).**

The estimated annual cost to respondents is \$678,295.80. This assumes a financial or administrative staff individual, at an hourly rate of \$26.26. (2017 General Pay Schedule, GS10, Step1), spends fifteen minutes completing each applicable 50080 forms and entering the information on that form in the eLOCCS for each submission. [25,830 burden hours x \$26.26 hourly rate = \$678,295.80 annual cost to respondents.]

13. There is no additional cost to respondents.

14. There is no cost to the Federal government.

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

Form HUD-50080-HOMI is removed from 2577-0166 as the form is no longer needed by ONAP grantees. OCFO confirmed that there are no funds remaining to be disbursed for the Indian HOME program for which HUD-50080-HOMI was used. Forms HUD-50080-NN, HUD-50080 RSDE and HUD-50080 RSDF have been removed. These grants are closed. The removal of these forms has resulted in a reduction of 11,134 burden hours.

Changes: On April 17, 2017, The Voice Response System (VRS) was converted to a Business Partner Registration Secure Systems, Line of Credit Control System (eLOCCS) for both the user and their Approving Official. This new Secure Systems assist the Office of Chief Financial Officer (OCFO) in planning, accounting, and evaluating HUD disbursements within specific grant funded programs, including Public and Indian housing programs. Grantees (all new or reinstated user who need to access eLOCCS) will need to complete the LOCCS HUD-27054E form, have it notarized, send the original HUD-27054E LOCCS Access Authorization form (with the original signature and notary seal) via U.S. Mail to the Program Office for review.

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

This information will not be published.

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

No request is made not to display the expiration date.

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

There are no exceptions to the certification statement in item 19.

B. Collections of Information Employing Statistical Methods

