

Supporting Statement for Paperwork Reduction Act Submissions
Congressional Earmark Grants
OMB #2506-0179

A. Justification

1. Why is the information necessary? Identify the 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 Department of Housing and Urban Development administers congressionally mandated grants known as earmarks. These projects are identified in HUD's annual appropriation of funds and in the conference report or congressional record accompanying the appropriation. Grantees are required to comply with 24 CFR Part 84 or Part 85, as applicable. This information is collected in order to make grant funds available to entities that have directed to receive funds by Congress. The Department does not anticipate any new applications for these grants in the near future, but administers approximately 450 open grants, for which semi-annual reports are required.

2. What information is to be collected? From whom? How is it collected? How will the information be used; for what purpose and by whom. How has it been used in the past?

HUD's Office of Policy Development and Coordination and its Environmental Officers in the field use this information to make funds available to entities directed to receive funds appropriated by Congress. This information is used to collect, receive, review and monitor program activities through applications, semi-annual and close-out reports. The information that is collected is used to assess performance. The information collected includes the grantees' contact information, the amount of money spent during six month intervals during the grant period and what the grantee has accomplished during six month intervals during the grant period of performance and what the grantee has accomplished by the end of the grant. Grantees are units of state and local government, nonprofits and Indian tribes. Respondents are initially identified by Congress and generally fall into two categories: Economic Development Initiative-Special Project (EDI-SP) grantees and Neighborhood Initiative (NI) grantees. The agency has used the application, semi-annual reports and close-out reports to track grantee performance in the implementation of approved projects. From the application, contact information, the nature of the project, the area where the project is taking place, the budget for the grant and architectural drawing and land site plans are collected along with project progress through semi annual reports.

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

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

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

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.

Applications are generally submitted electronically, through grants.gov. Semi-annual and reporting forms and other forms are generally submitted in paper form. Electronic submission of these latter forms will be possible with the establishment of a Department-wide “back end” information system for grants management. In an effort to reduce reporting burdens, the Department is able to accept reports in PDF format, through email submissions by grantees.

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

Each funded project is a new program and the information collected is unique to that program.

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.

The information collected does not impact small businesses or other 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.

All information collected is used to carefully consider applications for funding and grantee project implementation. If HUD collects less information, or collected information less frequently, the Department would be unable to determine the eligibility of applicants or the extent to which grantees are carrying out projects consistent with the approved application for those funds. Without the information collection, recipients would be unable to apply for funds, report progress, request funds or closeout grants.

7. Explain any special circumstances requiring:

- response more than quarterly; **There is no special circumstance for this item.**
- response in fewer than 30 days; **There is no special circumstance for this item.**
- more than an original and two copies of any document; **There is no special circumstance for this item.**
- retain records for more than three years (*other than health, medical, government contract, grant-in-aid, or tax records*); **There is no special circumstance for this item.**
- statistical surveys not designed to produce results that can be generalized to the universe of study; **There is no special circumstance for this item.**
- statistical data classification not been approved by OMB; **There is no special circumstance for this item.**
- 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 **There is no special circumstance for this item.**
- respondents to submit proprietary trade secret, or other confidential information. **There is no special circumstance for this item.**

There are no special circumstances within this standard that require collection of information under the circumstances outlined above.

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.

HUD published a notice in the Federal Register to solicit public comment on June 16, 2017 in Vol 82, page 27719, No comments.

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

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.

No assurances of confidentiality are involved because no confidential information is collected. Information collected does not contain private information. Information on forms such as the direct deposit forms are sent to Accounting for processing.

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

No such information is required to be reported.

12. Estimate public burden:
 - number of respondents,
 - frequency of response (*if a respondent provides multiple documents at one time, consider that a single response*),
 - average total responses annually
 - average 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.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Grant closeout documents SF-425	450.00	2.00	900.00	0	0	0	\$0

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.

The estimates of the total annual cost burden to respondents or record keepers resulting from this collection of information are included in Item 12.

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

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Grant closeout documents SF 425	450.00	2.00	900.00	.50	450.00	\$49.96	\$22,482.00

It takes approximately 30 minutes to process a form, that includes reading the material sent to us, analyzing it and then processing the form that has been received.

GS-13 step 4 Average salary \$49.96 per hour * ½ hour to process *900 responses = \$22,482

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 are fewer grants because no new appropriations was passed since 2010. Some grants have closed, therefore there are a fewer number of grantees completing paperwork. No other grants have been appropriated for the Congressional Earmark Program. HUD forms, 27053, 27054, 27056 and SF 424 are no longer being used.

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

Information collected will not be published.

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

HUD will display the expiration date for OMB approval for this information collection.

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

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

HUD does not request an exception to the certification of this information collection.