

**Supporting Statement for Paperwork Reduction Act Submissions  
(2 Year Expenditure Deadline Waiver Request)  
(OMB# 2506-0206)**

**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.

This information collection is being conducted by CPD Office of Block Grant Assistance to assist the Administrator of HUD in determining, as required by section 904(c) under Title IX of the Disaster Relief Appropriations Act, 2013 (Public Law 113-2, enacted January 29, 2013), whether to grant extensions of the 24-month expenditure deadline for grantees (Entitlement communities, States and units of general local governments) receiving funds under the 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 Office of Management and Budget authorized HUD to grant extensions of the expenditure deadline within certain parameters for grantee activities where it is impracticable for grantees to expend activity funds within the 24-month period and achieve program missions. The “CDBG-DR Expenditure Deadline Extension Request Template (P.L. 113-2 Grantees Only)” will serve as a vehicle for standardizing the information submitted by grantees to HUD. The Department derived the majority of fields in this template from information required by OMB for the Department’s request for authority to grant extensions. Due to the time-sensitive nature of the Department’s review, the template will ensure grantees provide all the information necessary for the Department to evaluate an activity for an extension in an expeditious manner.

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 CDBG-DR Expenditure Deadline Extension Request Template can be submitted to the HUD community planning development (cpd) specialist (either field office or Headquarters) electronically (via email) as long as the CDBG-DR Expenditure Deadline Extension Request Template accompanied by a letter requesting the waiver with the grant official’s authorized signature. This process reduces the burden on grantees by allowing them to submit 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.

This information is not collected anywhere else, as it relates to a requirement unique to this supplemental disaster relief appropriations law.

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.

The collection burden to small cities have been minimized by allowing the “CDBG-DR Expenditure Deadline Extension Request Template to be filed electronically via email. 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.

If this collection does not occur, the Department will have difficulty in collecting the information necessary to review and approve waivers of the expenditure deadline for recovery activities in an expeditious manner. If the Department is unable to use this template, grantees may face the risk of not receiving a waiver for an activity and face the recapture of the CDBG-DR funds associated with the activity by the Department.

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;

No other special circumstances would cause this information collection to be conducted in a manner that would impose one of the additional requirements identified under this item.

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

No other special circumstances would cause this information collection to be conducted in a manner that would impose one of the additional requirements identified under this item.

- requiring respondents to submit more than an original and two copies of any document;  
No other special circumstances would cause this information collection to be conducted in a manner that would impose one of the additional requirements identified under this item.

- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

No other special circumstances would cause this information collection to be conducted in a manner that would impose one of the additional requirements identified under this item.

- 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;

No other special circumstances would cause this information collection to be conducted in a manner that would impose one of the additional requirements identified under this item.

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

No other special circumstances would cause this information collection to be conducted in a manner that would impose one of the additional requirements identified under this item.

- 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

No other special circumstances would cause this information collection to be conducted in a manner that would impose one of the additional requirements identified under this item.

- 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.

No other special circumstances would cause this information collection to be conducted in a manner that would impose one of the additional requirements identified under this item.

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.

HUD published a notice describing the Paperwork Reduction Act Submission in the *Federal Register* on June 26, 2018, for 60 days, vol 83 page 29814.

- 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.

Staff consulted with grantees 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. These consultations

were conducted on an individual basis upon the submission of the CDBG-DR Expenditure Deadline Extension Request Template.

- 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.

Staff consulted representatives of those from whom information from those who must compile records should occur at least once every 3 .These consultations were conducted on an individual basis upon the submission of the CDBG-DR Expenditure Deadline Extension Request Template.

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

Not applicable. No payment or gifts are provided to any respondents for any information.

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

24 CFR 570.508 of the CDBG regulations states that grantees shall provide citizens with reasonable access to records regarding the past use of CDBG funds, consistent with applicable State and local laws regarding privacy and obligations of confidentiality.

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.

The information collection request does not include any sensitive questions.

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.

<b>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>2 Year Expenditure Deadline Waiver Request</b>	25.00	1.00	25.00	4.00	100.00	\$25.43*	\$2,543.00

\*2018 GS-11/Step 1

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.

No other costs than stated in #12 above.

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.

<b>Information</b>	<b>Number of</b>	<b>Frequency of</b>	<b>Responses</b>	<b>Burden</b>	<b>Annual</b>	<b>Hourly</b>	<b>Annual</b>
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Collection	Respondents	Response	Per Annum	Hour Per Response	Burden Hours	Cost Per Response	Cost
2 Year Expenditure Deadline Waiver Request	25.00	1.00	25.00	4.00	100.00	\$25.43*	\$2,543.00

\*2018 GS-11/Step 1

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

Because over time, the amount of grantees that would need a 2 year extension shrunk.

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 collected is not for statistical use nor does the collection uses statistical methods.

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 of the information collection.

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

There are no exceptions to the signed certification.

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