

**Supporting Statement for Paperwork Reduction Act Submissions**  
**Race and Ethnic Data Collection**  
**OMB: 2535-0113**

**A. Justification**

1. Authority: HUD Regulations 24 CFR 1.6 - Nondiscrimination in Federally Assisted Programs of the Department of Housing and Urban Development -Effectuation of Title VI of the Civil Right Act of 1964; *Federal Register* Notice (62 FR 58782-58790) published on October 30, 1997; and Office of Management and Budget (OMB) Bulletin No. 00-02 –Provisional Guidance on Aggregation and Allocation of Data on Race for Use in Civil Rights Monitoring and Enforcement.

Based on the Department of Housing and Urban Development’s (HUD) Title VI Regulations (24 CFR 1.6), HUD requires all recipients of funding to maintain and submit racial and ethnic data so HUD may determine whether federally assisted programs are in compliance with Title VI data collection requirements. HUD must offer individuals, who are responding to agency data requests for race, the option of selecting one or more of five racial categories. HUD must also treat ethnicity as a category separate from race, and change the terminology for certain racial and ethnic groups.

2. Under Title VI of the Civil Right Act of 1964, no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance from the Department of Housing and Urban Development. Title VI requires all recipients of HUD funding to maintain and submit this data during program monitoring and compliance reviews to ensure compliance with nondiscrimination requirements of Title VI.

This collection of information provides that all HUD programs comply with OMB guidelines on reporting aggregating data on race and ethnicity.

3. HUD’s automated systems have been modified to conform to the latest requirements of the Title VI regulations. The E-Grants electronic data system is the primary system for collection of this information.
4. This collection of information is not being duplicated.
5. This collection of information does not have an impact on small businesses or other small entities.
6. The racial and ethnic data of HUD funded recipients must be available to the Department to show:
  - (1) the actual beneficiaries of HUD’s programs and activities;
  - (2) the extent to which members of minority groups are beneficiaries of HUD’s federally assisted programs.
7. There are no special circumstances that require this collection of information to be conducted in a manner that is inconsistent with the guidelines in 5 CFR 1320.6. This includes:
  - 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 (N/A); or
  - 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).
8. Notice of this collection of information was published in the *Federal Register* on December 4, 2018, Vol. 83 Page 62599. No comments were received.
9. There are no payments or gifts provided to respondents in this collection of information.
10. There are no assurances of confidentiality provided in this collection of information. The information requested under this collection is protected and held private in accordance with 5 U.S.C. 552 (Freedom of Information Act), and (Privacy Act of 1974). A Privacy Threshold Analysis was approved by the Department.
11. The collection does not contain information of a sensitive nature about sexual behavior or attitudes, religious beliefs, or private matters.
12. Estimated Burden

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
HUD - 27061 Race and Ethnic Data Reporting Form	4,100.00	1.00	4,100.00	0.50	2,050.00	\$20.88	\$42,804.00
Total	4,100.00	1.00	4,100.00	0.50	2,050.00	\$20.88	\$42,804.00

The annual burden is calculated at the hourly rate of a nonprofit Executive Director position who would complete the form. This data is taken from [payscale.com](https://www.payscale.com/research/US/Job=Executive_Director/Salary) at [https://www.payscale.com/research/US/Job=Executive\\_Director/Salary](https://www.payscale.com/research/US/Job=Executive_Director/Salary).

13. There is no additional cost burden to respondents.
14. Estimated Cost to the Federal Government.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
HUD -27061 Race and Ethnic Data Reporting Form	4,100.00	1.00	4,100.00	0.50	2,050.00	\$39.96	\$81,918.00
Total	4,100.00	1.00	4,100.00	0.50	2,050.00	\$39.96	\$81,918.00

The cost is calculated at the hourly rate of a GS-12 staff member in the Washington D.C. area and additional operating expenses to review the responses. Data is taken from the Office of Personnel Management and the table with Washington-Baltimore-Arlington locality pay.

15. This is a reinstatement with change, of a currently approved collection. Information on this form has been changed. The five racial categories section has been amended slightly.
16. The results of this collection of information will not be published.

17. The OMB approval number and expiration date will be displayed on the form.

18. There are no exceptions to the certification statement identified in Item 19 of OMB 83-I.

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

The collection of information will not be used for statistical purposes.