

**Supporting Statement for Paperwork Reduction Act Submissions**  
**HUD-Administered Small Cities Program Performance Assessment Report**  
**OMB Control Number 2506-0020**

**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.*

Title I of the Housing and Community Development Act of 1974, as amended, established the Community Development Block Grant (CDBG) Program. The Program has two components – an entitlement component for metropolitan cities and urban counties and a non-entitlement component for small cities and rural areas. The Omnibus Budget Reconciliation Act of 1981 gave states the opportunity to assume administration of the entitlement component. Section 104(e) of the Housing and Community Development Act (HCDA) of 1974 require that each grantee must submit a performance and evaluation report to HUD.

Forty-nine states (including Puerto Rico) administer the nonentitlement, or State, CDBG program. The State of New York assumed administration of its State CDBG program in Fiscal Year 2000, leaving only the State of Hawaii administered by HUD. HUD is statutorily required to administer the nonentitlement component (commonly known as the “Small Cities Program”) in any state which does not assume administration of the program. However, if any of the states currently administering the State CDBG program should decide not to administer the program, the allocation for that state would be equally divided among the remaining states.

An extension without change of a currently approved collection is requested for the annual performance assessment report, submitted by the grantees in the Small Cities program enabling HUD to track program progress. Approximately 40 localities under the jurisdiction of the HUD-administered program (those funded prior to New York’s takeover of its Small Cities program) require only 4 hours (reduced from 8 hours) to complete the Performance Assessment Report. Since each of the localities have completed the expenditure of their original HUD grant, all Small Cities Programs are being funded with Program Income.

Because the state administers the non-entitlement CDBG funding in New York, HUD does not accept applications for annual funding competitions.

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.*

HUD Form 4052 is the Performance Assessment Report (PAR) which grant recipients are required to submit on an annual basis to report on program progress. HUD is statutorily required to monitor program participants for timely program progress and failure to have an approved reporting format would hamper HUD's ability to carry out this responsibility. The three Small Cities program grantees in Hawaii are required to follow the reporting requirements from the CDBG Entitlement program and are covered by the OMB approval (2506-0077) for that program.

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.*

There are currently no information collection technologies uniformly available which would reduce the reporting burden on all affected units of general local government. The information collection requirements have been reduced to the minimum necessary to meet statutory requirements. The program phased out in 2006 and so automating the form is not beneficial at this point.

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.*

No duplication of effort is caused by this information collection request since this is the only reporting method that exists for the small cities program.

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 of information 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.*

The information to be collected under this request is not available through any other source and is the only method of reporting for this information. Without this report HUD could not track the program for program and financial compliance.

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 often 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 that 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; or **N/A**
- requiring respondents to submit proprietary trade secrets, 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**

*HUD is statutorily required to collect information necessary to evaluate program progress and compliance on an annual basis and there are no special circumstances.*

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 on 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 may preclude consultation in a specific situation. These circumstances should be explained.

This information collection request is not inconsistent with 5 CFR 1320.6. HUD Field Offices dealing with affected units of general local government have not been advised of any problems or controversy regarding the use of these forms or the collection of information.

This notice was published in Federal Register, Volume 84 No. 22890 on May 20, 2019 for 60 days and no comments were received.

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

No payment or gifts were provided to respondents.

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

The information collected under this request does not include information on individuals. No assurances of confidentiality have been given.

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 for approval 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.
- 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 Instrument</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>
HUD-4052	40.00	1.00	40.00	4.00	160.00	\$31.50	\$5,040.00
<b>Total</b>							

13. Provide an estimate for 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 and 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 collections 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.

There are no additional costs to the respondent.

14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

Annualized Cost to the Federal Government

Information Collection Instrument	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
HUD-4052	40.00	1.00	40.00	2.00	80.00	\$41.12	\$3,289.60
<b>Total</b>							

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

**\*\*This is an extension without change of a currently approved collection. The decrease in the number of hours reflects that the program has phased out and grantees do not require as much time to complete the Program Assessment Report. Most grants are complete and closed out. Since there are so few active grants and respondents must only report on program income the time for reporting has also decreased. The hourly cost to the Government is based on calculating a GS-12s hourly rate in the field times the hours to review the Performance Assessment Report.**

*16. For collections 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 its collection use statistical methods and will not be published.

*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.*

We are not seeking approval to not display the expiration date for OMB.

*18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.*

There are no exceptions to the signed certification