

Supporting Statement for Paperwork Reduction Act Submissions
Opportunity Zones
OMB Number 2501-XXXX

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitates the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authoring the collection of information.**

Per the Executive Order on Establishing the White House Opportunity and Revitalization Council, signed December 12, 2018, HUD is to lead interagency efforts to support the Opportunity Zone Initiative. Additionally, HUD is responsible for supporting the Council workstreams of “Economic Development” and “Measurement”. Furthermore, the Opportunity Zone Initiative supports HUD’s responsibilities under sections 2 and 3 of the HUD Act, 42 U.S.C. § 3531-32, to assist the President in achieving maximum coordination of the various federal activities which have a major effect upon urban community, suburban, or metropolitan development; to develop and recommend to the President policies for fostering orderly growth and development of the Nation’s urban areas; and to exercise leadership, at the direction of the President, in coordinating federal activities affecting housing and urban development.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for new collections, indicate the actual use the agency has made of the information received from the current collection.**

This is a new information collection. The information will be collected and analyzed by HUD’s Office of Policy Development and Research. The purpose of this information collection is to 1.) In the event it is suspected that a grantee is falsely claiming to be conducting activities within an Opportunity Zone in order to obtain preference, this information will allow us to more easily verify or disprove the claim. And 2.) This collection will provide important data regarding which Opportunity Zones HUD’s grant funds are being expended in, the average percentage of a grant award expended within an OZ, and the nature of the project being funded.

- 3. Technology applied to the collection:**

This form may be completed entirely electronically. The form will be attached to the SF-424 on grants.gov. Certain fields of the form (indicated in attached copy) will be auto populated from information submitted on the 424. The form may be submitted along with the SF-424 or sent by email.

- 4. Duplication of Effort:**

Information collected is unique and does not duplicate any similar information or method. In developing this information collection, HUD and other agencies have built upon the experience with programs in relevant policy areas that are administered by multiple agencies, including Promise Zones, the Choice Neighborhoods, Promise Neighborhoods, Byrne Criminal Justice Innovation programs and Rural Development programs.

5. Impact on Small Business and Small Entities:

These information collections have no impact on small businesses or other entities.

6. Consequence of Less Frequent Collection:

Collection of this information is necessary, as without it, HUD would have no way of verifying grantees are conducting activities within Opportunity Zones. Additionally, HUD would have no way of collecting important data the Agency needs to make future decisions on grant awards targeted to Opportunity Zones.

7. Special Circumstances for Information Collection:

- requiring respondents to report information to the agency more than quarterly;
 - Respondents will need to complete the form for each grant that they are applying for and seeking opportunity zone preference points. Frequency of response may vary by applicant, based on the availability of grant opportunities and if eligibility for preference.
- 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; or **N/A**

8. Federal Register Notice and Public Comments:

A Notice was published in the *Federal Register*, Vol. 84, No.197 pages 54629 and 54630 on Thursday, October 10, 2019, to solicit comments on the Opportunity Zones information collection. HUD only received one public comment, in which the constituent indicated appreciation and support for the implementation of the form.

9. Payment/Gifts to Respondents:

No payments or gifts are provided to respondents for any of these information collections.

10. Assurances of Confidentiality:

Assurance of confidentiality is neither provided nor needed for any of these information collections.

There is no assurance of confidentiality provided to the respondent for this information collection. The system has been certified by the government standard to handle confidential information. The Freedom of Information Act 5 USC §552, is a federal freedom of the information law that requires the full or partial disclosure of previously unreleased information and documents controlled by the United States government upon request.

11. Questions of a Sensitive Nature:

No sensitive questions are being asked for any of these information collections.

12. Estimate of Annual Burden Hours for Information Collection:

The chart below outlines the burden associated with the form, Opportunity Zone Grant Certification Form. For Opportunity Zone grantees, the burden hours per response total 12 minutes. The total burden hours are estimated at 333.12 hours.

Information Collection	Number of respondents	Frequency of response	Responses per annum	Burden hour per response	Annual burden hours	Hourly cost per response	Annual Cost
Certification for OZ Preference Form	737.00	2.26	1,665.62	.20	333.12	\$36.28	\$12,085.59
Total	737.00	2.26	1,665.62	.20	333.12	\$36.28	\$12,085.59

Source: Bureau of Labor Statistic, Occupational Employment Statistic (May 2018)
https://www.bls.gov/oes/current/oes_stru.htm

13. Cost Burden of Information Collection:

There are no start-up or additional costs to the respondents other than those reported in Item 12 above in the Burden Cost Column.

14. Annualized Cost to 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
Certification for OZ Preference Form	737.00	2.26	1,665.62	0.08	133.24	\$39.96	\$5,324.27
Total	737.00	2.26	1,665.62	0.08	133.24	\$39.96	\$5,324.27

Annual Cost Per Response is calculated at a GS-12 Step * with the approximate salary of government employee involved in the review and subsequent monitoring of the applicants.

The maintenance of this form requires approximately one-quarter of full-time equivalent position, plus part-time engagement from other participating federal agencies. Review of information collected using this instrument will require 5 minutes of each federal agency who receives the form in the submitted grant and technical assistance application. This level of effort is estimated to cost an average of \$660 annually.

15. Changes or Adjustments to OMB Form 83-I:

N/A

16. Publication of Information Collection Results:

HUD does not anticipate publishing the results of this information collection.

17. Expiration Date:

The OMB approval number and date will appear on the HUD-prescribed forms.

18. Exceptions to Certification Statement:

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