

Supporting Statement for Paperwork Reduction Act Submissions
Disaster Recovery Grant Reporting System
(OMB# 2506-0165)

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.

a. CDBG Disaster Recovery (CDBG-DR)

The Community Development Block Grant (CDBG) program is authorized under Title I of the Housing and Community Development Act of 1974 (HCDA), as amended. According to Section 104(e)(1) of the Act, HUD is responsible for reviewing grantees' compliance with applicable requirements and their continuing capacity to carry out their programs. Program rules are published in the Federal Register pursuant to specific appropriation acts. Under this program, HUD provides supplemental CDBG funds appropriated by Congress for recovery from major disasters declared by the President of the United States. Each supplemental appropriations statute specifies the disasters or time period of disaster declarations for which funding is available. Grant funds are made available to states, units of general local government, Indian tribes, and insular areas, unless provided otherwise by supplemental appropriations statute, based on unmet disaster recovery needs. Unless otherwise restricted by statute or provided by waiver, the funds may be used for any activity eligible under section 105(a) of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 *et seq.*) (HCD Act). Each funded program or activity must also meet a national objective and address a direct or indirect impact from the applicable disaster(s). Unless waived by the applicable *Federal Register* notice, at least 70 percent of the funds must be used for activities that principally benefit persons of low and moderate income. Grantees must report program progress quarterly via the web-based Disaster Recovery Grant Reporting (DRGR) system.

This update includes fifty-one (51) new Community Development Block Grant disaster recovery (CDBG-DR) grants added to the DRGR system due to the following five supplemental appropriations:

Public Law 114-223, provided \$500 million
Public Law 114-254, provided \$1.8 billion
Public Law 115-31, provided \$400 million
Public Law 115-56, provided \$7.4 billion
Public Law 115-123, provided \$28 billion
Public Law 115-254, provided \$1.6 billion
Public Law 116-20, provided \$2.4 billion

These revisions update the previously approved DRGR PRA information collection to account for the increase in burden hours associated with these fifty-one (51) new CDBG-DR grants.

Congress has appropriated funds for CDBG disaster recovery since September 18, 2001. CDBG-DR statutes are located here: <https://www.hudexchange.info/cdbg-dr/cdbg-dr-laws-regulations-and-federal-register-notices/>

b. Neighborhood Stabilization Program (NSP1, NSP2 & NSP3)

The Neighborhood Stabilization Program (NSP) was established for the purpose of stabilizing communities that have suffered from foreclosures and property abandonment. On July 21, 2010, President Obama signed the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank Act”) into law (Public Law 111-203). This law provides \$1 billion of formula grant funding for the redevelopment of foreclosed upon and abandoned homes to be allocated under the terms of Title XII, Division A, Section 2 of the American Recovery and Reinvestment Act (“Recovery Act”) and by the formula factors provided in Title III of Division B of the Housing and Economic Recovery Act of 2008 (Public Law 110-289) (“HERA”). In 2008, HERA provided for an initial round of formula funding to regular State and entitlement Community Development Block Grant (“CDBG”) grantees through the Neighborhood Stabilization Program (“NSP1”). The Recovery Act provided for a neighborhood stabilization grant competition open to State and local governments, as well as non-profit groups and consortia that may include for-profit entities (“NSP2”).¹ The Dodd-Frank Act is the third round of Neighborhood Stabilization Funding (“NSP3”).

Although NSP funds are otherwise to be considered CDBG funds, HERA, the Recovery Act and the Dodd-Frank Act make substantive revisions to the eligibility, use, and method of distribution of NSP3 funds. For NSP1 and NSP3, grantees are required to submit substantial amendments to their consolidated plans to secure funding they are entitled to under the formulas.

The applicable section of the Dodd-Frank Act, Recovery Act and HERA are attached to this submission. These statutes, along with the Housing and Community Development Act of 1974, mandate and/or authorize the collection of data in this submission.

NSP statutes are located here: <https://www.hudexchange.info/nsp/nsp-laws-regulations-and-federal-register-notices/>

c. NSP3 Technical Assistance Grants

Authorized under Section 1497 of the Wall Street Reform and Consumer Protection Act of 2010 (Pub. L. 111-203, approved July 21, 2010) (“NSP3”), NSP3 Technical Assistance (TA) provides \$20 million to organizations that are experienced and successful in providing program, technical, planning, financial, and organizational capacity building assistance, or consulting in such areas as community development, affordable housing, organizational management, financing and underwriting, construction and rehabilitation management, land banking, project management and strategic planning. NSP3-TA follows these key objectives: (1) improve grantees' ability to assess conditions in the affordable segment of their local housing market consistent with the jurisdiction's Consolidated Plan and Analysis of Impediments; (2) improve grantees' ability to design and appropriately implement neighborhood stabilization programs based upon an accurate assessment of the affordable segment of their local housing market; (3) increase organizational capacity to leverage private and public dollars; and (4) improve grantees' understanding of and compliance with statutory and regulatory requirements. Teams of providers with a broad range of complementary skills and expertise, working collaboratively, were selected through a competitive process.

d. Rural Capacity Building and Section 4 programs

Rural Capacity Building for Community Development and Affordable Housing: Through the funding of national organizations with expertise in rural housing and community development, the Rural Capacity Building (RCB) Program enhances the capacity and ability of local governments, Indian tribes, housing development organizations, rural Community Development Corporations (CDCs), and rural Community Housing Development Organizations (CHDOs), to carry out community development and affordable housing activities that benefit low- and moderate-income families and persons in rural areas.

¹ NSP2 and NSPTA are subject to an information request under OMB Control Number 2506-0185.

Funds may be used under the RCB program to provide capacity building support across the following three eligible activity categories:

1. Training, education, support, and advice to enhance the technical and administrative capabilities of rural housing development organizations, CDCs, CHDOs, local governments, and Indian tribes, including the capacity to participate in consolidated planning, as well as in fair housing planning and Continuum of Care homeless assistance efforts that help ensure community-wide participation in assessing area needs; consulting broadly within the community; cooperatively planning for the use of available resources in a comprehensive and holistic manner; and assisting in evaluating performance under these community efforts and in linking plans with neighboring communities in order to foster regional planning;
2. Loans, pass-through grants, predevelopment assistance, or other financial assistance to rural housing organizations, CDCs, CHDOs, local governments, and Indian tribes to carry-out community development and affordable housing activities that benefit low-income or low- and moderate-income families and persons, including the acquisition, construction, or rehabilitation of housing for low-income or low- and moderate-income families and persons, and community and economic development activities that create jobs for low-income persons; and;
3. Such other activities as may be determined by the grantees in consultation with the Secretary or his or her designee.

The original authorizing statute for the RCB program is the Consolidated and Further Continuing Appropriations Act, 2012, Pub. L. 112-55. The statute link is <http://uscode.house.gov/statutes/pl/112/55.pdf>.

Section 4: The Capacity Building for Affordable Housing and Community Development Program, also known as the Section 4 program, was originally authorized under Section 4 of the HUD Demonstration Act of 1993 (Pub. L. 103-120, 107 Stat. 1148, 42 U.S.C. 9816 note), as amended. The program enhances the capacity and ability of community development corporations (CDCs) and community housing development organizations (CHDOs) to carry out community development and affordable housing activities that benefit low-income persons. The Section 4 program allows for the same three eligible activity categories detailed above for the RCB program.

The authorizing legislation and amendments list five eligible grantees: The National Community Development Initiative (now called Living Cities), Local Initiatives Support Corporation (LISC), The Enterprise Foundation (now called Enterprise Community Partners), Habitat for Humanity International (HFHI) and YouthBuild USA. In recent appropriation acts, Congress has limited eligible applicants to LISC, HFHI and Enterprise Community Partners.

The original authorizing statute for the Section 4 program is HUD Demonstration Act of 1993, Section 4, Public Law 103-120, 107 Stat. 1148, 42 U.S.C 9816 note. The statute link is <http://uscode.house.gov/statutes/pl/103/120.pdf>.

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?

a. CDBG Disaster Recovery

Grantees (cities, counties, and states that have received program grants) describe their program needs, develop action plans, drawdown funds, report performance, and submit the information to their assigned HUD office for formal review. Grantees may use the system to submit key information on funded activities such as responsible organization, beneficiary data, and grantee oversight. HUD reviews these items, approves or rejects them, and writes comments on its decisions. HUD HQ can work with the data to produce required reports to Congress. HUD HQ uses this data for program management purposes such as risk analysis, remote monitoring, and to respond to inquiries.

b. Neighborhood Stabilization Program

The respondents are formula grantees (states and units of local governments) under NSP1 and NSP3 and competitively selected grantees under NSP2 and NSP-TA. To comply with regulations, NSP1 and NSP3 grantees must submit substantial amendments to their annual action plans or abbreviated plans to receive NSP funds. Substantial amendments will be reviewed by HUD for compliance with requirements set forth in the combined NSP formula notice.

HUD requires all NSP grantees to collect information on the activities undertaken with NSP funds. HUD collects this information from recipients through DRGR. HUD Headquarters will use the information collected through DRGR to track compliance with NSP's statutory commitment and expenditure requirements and to generate the OMB prescribed quarterly reports. Program management reports are generated by DRGR to provide data on the status of each NSP recipients' commitment and disbursement of NSP funds. For NSP2, HUD will use this data to compile quarterly and annual reports to be posted on www.recovery.gov and www.hud.gov/recovery/. HUD HQ uses DRGR data for program management purposes such as risk analysis, remote monitoring, and to respond to inquiries.

c. Neighborhood Stabilization 3 - Technical Assistance

NSP3-TA awardees are competitively selected. Non-recurring pre-award information collections include applications and accompanying material. Post-award documentation includes the sub-grant award and executive compensation information as required by the Federal Funding Accountability and Transparency Act of 2006 (Public Law 109-282), and grant agreements. NSP TA awardees are required to report to the Government Technical Representatives no less than quarterly unless otherwise specified in the cooperative agreement. As part of this required report to HUD, award recipients will update DRGR with actual outputs and data related to outcomes achieved, and a narrative explanation of any disparity between projected and actual results. HUD Headquarters will use the information collected through DRGR to track compliance by the technical assistance providers with NSP TA's statutory commitment and expenditure requirements, and with the goals of technical assistance stated in the NSP TA Notice of Funding Availability [Docket No. FR-5499-N-01].

d. Rural Capacity Building and Section 4 programs

Grantees (national housing and community development non-profits) describe the capacity building needs of proposed beneficiaries, develop action plans, drawdown funds, report performance, and submit the information to their assigned HUD office for formal review. Grantees may use the system to submit key information on funded activities such as responsible organization, beneficiary data, and grantee oversight. HUD reviews these items, approves or rejects them, and writes comments on its decisions. HUD HQ uses this data to produce required reports to Congress. HUD HQ uses this data for program management purposes, such as risk analysis, monitoring, marketing materials and responses to inquiries.

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.

Yes, the information is submitted electronically via HUD's Disaster Recovery Grant Reporting System (DRGR)

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

No, the information is not collected elsewhere.

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.

While some small communities have received CDBG disaster recovery grants, the economic impact of this information collection effort should be small. Currently, active CDBG DR and NSP grantee users are mostly State, local, or tribal governments. Some non-profit NSP2 grantees and approximately 10 NSP technical assistance providers also use DRGR for reporting and draw down of funds.

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.

For disaster recovery and NSP2, HUD requires grantees to report to HUD only as frequently as Congress requires HUD to report to Congress (House and Senate Appropriations Committees). As the recovery efforts from each disaster vary considerably, HUD would be unable to report to Congress on the activity of any grantee not reporting to HUD on a quarterly basis.

For NSP1 and NSP3, HUD considered configuring DRGR for less frequent reporting, but concluded that the risks of not maintaining up-to-date program information were too high regarding program performance and possible fund recapture.

7. Explain any special circumstances requiring:

- response more than quarterly; N/A
- response in fewer than 30 days; N/A
- more than an original and two copies of any document; N/A
- retain records for more than three years (other than health, medical, government contract, grant-in-aid, or tax records); N/A
- statistical surveys not designed to produce results that can be generalized to the universe of study;
- statistical data classification not been approved by OMB; N/A
- 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 N/A
- respondents to submit proprietary trade secret, or other confidential information. N/A

There are no special circumstances that require: responses more than quarterly; response in fewer than 30 days; more than an original and two copies of any document; retain records for more than three years; statistical surveys not designed to produce results than can be generalized to the universe of study; statistical data classification not been approved by OMB; 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 respondents to submit proprietary trade secret, or other confidential information.

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.

Published in the Federal Register on January 28, 2020; vol 85, page 5015. No comments were received. No other consultation with persons outside the agency was conducted.

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

No payment or gift is provided to respondents.

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

This issue does not pertain to the data stored in DRGR. However, access to the system is restricted to ensure that only authorized users are entering information into the system. Grantee users are only allowed to work with their own grant's data. A local grantee system administrator has control over who from the local staff can work on the grantee's data. Except for three "super users" from the HQ program office, HUD staff cannot change local data. They can only view it and submit comments on it. The system records user logins and can track certain changes by the user who made them. Information stored in DRGR is subject to FOIA however no PIIA is stored within DRGR.

There are no assurance of confidentiality provided or needed for this collections. The Privacy Act of 1974 provided privacy protection to respondents.

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

There are no questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private.

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.

a. Disaster Recovery

The DRGR system has 141 open CDBG-DR grants in DRGR, including the 51 grants generated by allocations under the five supplemental appropriations covered by this update and all remaining open grants from prior supplemental appropriations (see Section A.1.a). The summary information and table below include both one-time only and recurring submission reporting burden calculations. The calculation of cost burden for CDBG-DR grantees takes into account the size of the grantee based on amount of funds received. Grantees have been divided between average-sized (less than \$100M) and large (over \$100M).

HUD requires each grantee to report their performances to the system quarterly. Some grantees have more than one open grant under multiple appropriations, but HUD only requires grantees to report quarterly on each DRGR Action Plan in the system.

Submissions include drawdown vouchers and quarterly performance reports (QPR). There may be several line items included in each voucher and several activities reported on within a QPR. The QPR also includes submission of the SF-425 report and contract reporting. Vouchers from large grantees normally tend to include significantly more line items and require much greater time to process than average grantees.

Submissions during the pre- and post-award periods only take place once. Submissions during the quarterly reporting period continue through the life of the grant. The figures below represent submissions that will occur during the time period associated with this collection based on averages derived from FY18. A copy of the estimation calculation worksheet is attached.

Cost figures are estimated based on local staff earning the equivalent of a GS-11 hourly rate.

One-time only submissions:

The one-time only pre- and post-award submissions for the 51 grants generated by allocations under the seven supplemental appropriations covered by this update include the published Action Plan, standard forms, DRGR Action Plan, and required financial control documentation. Total hours are estimated at 6,630 at a cost of approximately \$175,000.

Recurring submissions:

Recurring submissions include Action Plan amendments, quarterly performance reports and voucher submissions. For average-sized grants, the Department estimates 13 minutes needed per voucher. CDBG-DR grantees process approximately 16 vouchers per year. This requires a record keeping and reporting burden of approximately 13 hours per grantee, per year. Larger CDBG-DR grantees take approximately 22 minutes for each voucher and submit an average of 202 vouchers per year. Therefore, all CDBG-DR grantees collectively spend an estimated 2,704 hours submitting vouchers in the DRGR system for a total estimated annual voucher submission cost of approximately \$71,500.

Average-sized grantees spend an estimated 9 hours on each QPR, for a total of 3,960 hours. Large grantees spend an estimated 57 hours per QPR for a total of 7,068 hours. Therefore, all grantees collectively spend an estimated 11,028 hours per year submitting QPR data in DRGR. Total annual QPR submissions cost an estimated \$290,000.

Additionally, grantees are required to amend the Action Plan if there are changes to the types of programs offered with CDBG-DR funds or if there are significant changes to the programs themselves. The Federal Register notices define what is considered a significant change. The Department estimates that grantees would amend the Action Plan at least twice per year, which also triggers an update to the Performance and Financial Projections. Based on this estimation, grantees collectively spend an estimated 4,230 hours amending the Action Plan annually. The total annual cost associated with amending the Action Plan is estimated at \$11,800.

CDBG – DR									
	Description of Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost	
Non-recurring	PRE-AWARD								
	SUBMISSION REQUIREMENTS								
	Published Action Plan	51.00	1.00	51.00	40.00	2,040.00	\$26.45	\$53,958	
	SF 424	51.00	1.00	51.00	1.00	51.00	\$26.45	\$1,348.95	
	Procurement Financial Controls and DOB documentation	51.00	1.00	51.00	60.00	3,060.00	\$26.45	\$80,937	
	Performance and Financial Projections	51.00	1.00	51.00	8.00	408.00	\$26.45	\$10,791.16	
	POST-AWARD								
	Grant Agreement (HUD 40092)	51.00	1.00	51.00	1.00	51.00	\$26.45	\$1,348.95	
Recurring	DRGR Activation, Activity Set-Up and Completion	51.00	1.00	51.00	20.00	1,020.00	\$26.45	\$26,979	
		Description of Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
	REPORTING (Annual)								
Recurring	Average Sized Grants Online Quarterly Reporting via DRGR	110.00	4.00	440.00	9.00	3,960.00	\$26.45	\$104,742.00	
	Large Grants Online Quarterly Reporting via DRGR	31.00	4.00	124.00	57.00	7,068.00	\$26 .45	\$186,948.60	
	Average-sized grants online voucher submissions	110.00	16.00	1,760.00	0.22	387.20	\$26 .45	\$10,241.44	

	Large-sized grants online voucher submission	31.00	202.00	6,262.00	0.37	2,316.94	\$26 .45	\$61,283.06
	Action Plan Amendments (includes updated Projections)	141.00	2.00	282.00	15.00	4,230.00	\$26.45	\$111,883.50
	TOTAL PAPERWORK BURDEN	729.00	Varies	9,174.00	Varies	24,592.14	\$26.45	\$650,462.10

b. Neighborhood Stabilization Program

- There are currently 397 open NSP grants in DRGR. The following table demonstrates the estimated paperwork burden for recurring submissions.
- HUD requires each grantee to report their performances to the system quarterly. Some grantees have more than one open grant under different appropriation rules. Such a grantee must make one submission per grant per quarter.
- Submissions include drawdown vouchers and quarterly performance reports (QPR). There may be several line items included in each voucher and several activities reported on within a QPR. Vouchers from large grantees normally tend to include significantly more line items and require much greater time to process than average grantees,
- Submissions during the pre-award and post-award periods only take place once. Submissions during the quarterly reporting period continue through the life of the grant.
- Cost figures are estimated based on local staff earning the equivalent of a GS-11 hourly rate.

Recurring submissions:

For the 397 open NSP grants in the DRGR system, the Department estimates 11 minutes per voucher submission. NSP grantees process approximately 38 vouchers per year. This requires a record keeping and reporting burden of approximately 3,817.73 hours for an annual voucher submission cost of \$99,143.06.

NSP grantees spend an estimated four hours per QPR submission, for a total of 8,768 hours for a total annual QPR submission costs \$231,913.60.

Neighborhood Stabilization Program								
	Description of Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
	REPORTING (Annual)							
Recurring	Online Quarterly Reporting via DRGR	548.00	4.00	2,192.00	4.00	8,768.00	\$26.45	\$231,913.60
	DRGR voucher submissions	548.00	38.00	20,824.00	0.18	3,748.32	\$26 .45	\$99,143.06
	TOTAL PAPERWORK BURDEN	1,096.00	Varies	23,016.00	Varies	12,516.32	\$26.45	\$331,056.66

c. *NSP3 Technical Assistance Grants*

- There are currently 31 open NSP3-TA grant in DRGR. The following table demonstrates the estimated paperwork burden for recurring submissions.
- Submissions include work plans and drawdown vouchers. Each TA providers enters approximately five TA work plans per year and 38 drawdown vouchers per year.
- Cost figures are estimated based on local staff earning the equivalent of a GS-11 hourly rate.

For the 31 NSP3-TA average-sized grants, the Department estimates TA providers enter five work plans per year at eight hours per TA work plan for a total of 1,248 hours over the course of a year. Total annual QPR submission costs approximately \$32,798.

For the 31 NSP3-TA average-sized grants, the Department estimates 11 minutes per voucher. Grantees process approximately 38 vouchers per year. Total burden hours for all grantees over the course of the year is estimated at 1,178, for a total annual estimated submission cost of \$3,608.

Neighborhood Stabilization Program 3 - Technical Assistance								
	Description of Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
	REPORTING (Annual)							
Recurring	TA Workplan Submissions	31.00	5.00	155.00	8.00	1,240.00	\$26.45	\$32,798
	DRGR voucher submissions	31.00	38.00	1,178.00	0.18	212.04	\$26.45	\$5,608.46
	TOTAL PAPERWORK BURDEN	62.00	Varies	1,333.00	Various	1,452.04	\$26.45	\$38,406.46

e. *Rural Capacity Building and Section 4 programs*

- The system has 26 open grants in DRGR including all projected grants to be awarded through the FY2018 RCB and Section 4 NOFAs.
- HUD requires each RCB and Section 4 grantee to report their performances in the system semi-annually for each grant award.
- Submissions include drawdown vouchers and semi-annual performance reports (in the QPR Module). There may be multiple line items included in each voucher and several activities reported on within a QPR. Drawdown vouchers are usually submitted on a monthly basis.,
- Since these grantees are National Non-Profits and often staffed by mid-career individuals, the cost figures are estimated based on local staff earning the equivalent of a GS-13 base hourly rate.

One-time only submissions:

- The one-time non-recurring submissions include DRGR activation and account setup, plus creation of the original Action Plan. Total hours are estimated at 112 at an estimated cost of \$4,200.

Recurring submissions:

Grantees have shown a need to revise their Action Plans to provide implementation updates prior to semi-annual report submission. The Department estimates that each Action Plan revision will take 30 minutes and will occur two times a year. Grantees are estimated to spend 266 hours per year on Action Plan revisions. The Total estimated costs for all grantees for Action Plan revisions is \$980.

Recurring submissions include semi-annual progress reports and voucher submissions. For grantees, the Department estimates 15 minutes needed per voucher with grantees processing approximately 12 vouchers per year. This requires a record keeping and reporting burden of approximately three hours per grantee, per year. Therefore, all grantees collectively spend an estimated 78 hours submitting vouchers in the DRGR system for a total estimated annual voucher submission cost of \$2,940.

Grantees spend an estimated eight hours on each semi-annual report, for a total of 416 hours. Total annual semi-annual report submissions cost an estimated \$15,.

f. Total Burden Hours

The following table summarizes the total burden hours required across programs and estimated costs related to this collection.

Rural Capacity and Section 4

	Description of Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Non-recurring	DRGR Activation & Account Setup	8.00	1.00	8.00	2.00	16.00	\$37.70	\$603.20
	Action Plan Setup & Submission	8.00	1.00	8.00	12.00	96.00	\$37.70	\$3,619.2
Recurring	Action Plan Revisions	26.00	2.00	52.00	0.50	26.00	\$37.70	\$980.2
	Semi-Annual Report Submissions	26.00	2.00	52.00	8.00	0.00	\$37.70	\$15,683.20
	Voucher Submission	26.00	12.00	0.00	0.25	78.00	\$37.70	\$2,940.60
Total Paperwork Burden		94.00	Varies	432.00	Varies	632.00	\$37.70	\$23,826.4

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.

DRGR does not have any additional costs associated with this collection.

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

a. Disaster Recovery, NSP, and NSP3-TA

The total cost to the government for working with the data is estimated to total approximately \$1,043,764.85. System development and maintenance costs are not included in these estimates.

b. Rural Capacity Building and Section 4 programs. The total cost to the government for working with the data is estimated to total approximately \$38,406.46. System development and maintenance costs are not included in these estimates.

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.

- 55 new CDBG-DR grants have been added to the system since the last PRA submission.
- No new NSP grants have been added to the system since the last PRA submission.
- No new NSP-3 TA grants have been added to the system since the last PRA submission.
- No new Rural Capacity Building and Section 4 grants have been added to the system since the last PRA submission.

The DRGR system is updated regularly (at least once per year). A description of DRGR updates are located here: <https://www.hudexchange.info/programs/drgr/>. Reporting requirements are expected to be substantively the same.

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

Each quarter HUD prepares reports from the data system that highlights the uses of funds and accomplishments of grantees. A synthesis of these reports is presented to Congress.

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

HUD is not seeking approval to not display the expiration date for OMB approval.

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