

# Supporting Statement A for Paperwork Reduction Act Submissions

**OMB Control Number 1084-0010**

**Terms of Clearance:** None

## **General Instructions**

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question "Does this ICR contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

## **Specific instructions**

### **Justification**

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

Public law 91-646, Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, requires each Federal agency acquiring real estate interests to provide relocation benefits to individuals and businesses displaced as a result of the acquisition. Affected individuals and businesses must prepare and file the form in order to receive benefits. According to 42 USC 4622, no payment of moving and related expense may be made unless a properly executed claim form has been received.

This justification requests approval of Claim for Relocation Payments – Residential, DI-381, and Claim for Relocation Payments – Nonresidential, DI-382, OMB Control Number 1084-0010 which expires on November 30, 2018.

These forms were originally created because of the amendments to the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Act) made by the Uniform Relocation Assistance Act of 1987, Public Law 100-17. They were revised in 2005 to more closely reflect the changes made by the Uniform Relocation Assistance and Real Property Acquisition Act final rule published January 4, 2005, by the Federal Highway Administration. Previous revisions made the forms more user-friendly; incorporated citations; revised the sections relating to certification of occupancy status (citizen or national of the United States or alien lawfully present in the United States); included a Last Resort Housing Payment indicator; space for agency payment invoice numbers; and clarified the allowable and non-allowable moving expenses sections. No changes to the forms have been made since the last submission.

- 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. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

The information required is obtained through application made by the displaced person or business to

the funding agency for determination as to the specific amount of monies due under the law. The forms, through which application is made, require specific information since the Act allows for various amounts based upon each actual circumstance. Failure to make application to the agency would eliminate any basis for payment of claims. The application forms are divided into two types, Claim for Relocation Payments – Residential (Form DI-381), and Claim for Relocation Payments – Nonresidential (Form DI-382), since legislation addresses each separately and allows separate and distinct payments.

***Claim for Relocation Payments – Residential (Form DI-381):***

- Item 1 solicits the name, address, and phone number of claimant to allow for communication and certification of occupancy status.
- Items 2 through 7, inclusive, establish a specific type of occupancy since each type receives different payments.
- Items 8 and 9 provide an indication as to volume of personal property which needs to be moved.
- Item 10 provides data to insure that all persons entitled to relocation monies are notified as to their possible benefits.
- Items 11 through 14, inclusive, provide data needed to finalize all benefit requirements.
- Item 15 is a summarized total amount obtained by completing a specific schedule pertaining to different entitlements authorized by the Act.
- Item 16 certifies the accuracy of the claimant information and requires claimants' signature(s).
- Section two certifies the agency inspection of the replacement dwelling and requires the inspecting officials' signature.

***Schedule A (Payment of Moving Costs – Residential):***

- Items 1 and 2 are used for internal control.
- Item 3 provides for a choice of payment being claimed.
- Items 4 and 5 seek actual amounts incurred for reimbursement.
- Item 6 seeks information whether a fixed payment or an actual cost move is desirable to the claimant.
- Item 7 requires claimants' signature(s).
- Section two is the internal review of claim and approval by the agency.

***Schedule B (Claim of Home Owners Replacement Housing Payment – Residential):***

- Items 1 and 2 are used for internal control.
- Item 3 establishes a specific element set for internal control.
- Item 4 establishes a specific element set forth in the law to receive a certain benefit. Item 4 seeks actual amounts incurred in purchasing a replacement home for reimbursement.
- Items 5 and 6 require the claimant to disclose if any monies have been advanced prior to this action.
- Item 7 requires claimants' signature(s).
- Section two is the internal review of the claim and the establishment of exact entitlement amount by the agency as prescribed in the Act and approval of payment.

***Schedule C (Claim of Rental Replacement Housing Payment – Residential):***

- Items 1 and 2 are used for internal control.
- Items 3 through 7, inclusive, are required to be completed in order for a computation for an amount to be paid.
- Item 8 is a choice of how the benefit is distributed.
- Item 9 requires claimants' signature(s).
- Section two is the internal review of claim and the establishment of exact amount authorized and for approval of payment.

***Schedule D (Downpayment and Incidental Expenses – Residential):***

- Items 1 and 2 are used for internal control.
- Items 3, 4, and 5 identify expenses incurred for which reimbursement is sought.
- Items 6 and 7 require disclosure of any advanced funds provided.
- Item 8 requires claimants' signature(s).
- Item 9 allows space for claimant remarks.
- Section two is the internal review of claim and establishment of exact entitlement amount authorized by law and payment approval.

***Claim for Relocation Payments – Nonresidential (Form DI-382):***

- Items 1 and 2 solicit the name, address, and phone number of the claimant or claimant's representative to allow for communication.
- Items 3 through 9, inclusive, establish the type of displacement and specific dates required for allocation of payments.
- Item 10 requests the type of claim since the Act allows for variations.
- Item 11 requests payment in accordance with the Act as to the two types of payments allowed.
- Item 12 is a summarized total amount obtained by completing a specific schedule for actual amounts authorized.
- Item 13 seeks information regarding claimant request for fixed payment in lieu of actual expenses.
- Item 14 seeks information as to whom payments are made.
- Item 15 certifies the accuracy of the claimant information and requires claimants' signature(s).
- Section two is for internal review and approval of payment by the displacing agency.

***Schedule A (Moving and Related Costs – Nonresidential):***

- Items 1 and 2 are for internal control.
- Item 3 solicits the type of move being made.
- Items 4 and 5 ask for actual amounts paid and to whom, for the moving and storage of property relating to business.
- Item 6 allows space for claimant remarks.
- Item 7 requires claimants' signature(s).
- Section two is the internal review of claim and the approval for payment.

***Schedule B (Direct Loss of Personal Property – Nonresidential):***

- Items 1 and 2 are for internal control.
- Item 3 is the claim for an amount not recovered through the sale of personal property when the sale price is deducted from the value in place, not to exceed the cost of moving the property as authorized by law.
- Item 4 allows space for claimant remarks.
- Item 5 releases title to all remaining property left after vacation to the acquiring agency and requires claimants' signature(s).
- Section two is the internal review of claim and the approval for payment.

***Schedule C (Search Expenses – Nonresidential):***

- Items 1 and 2 are for internal control.
- Item 3 requires the itemization of expenses incurred in trying to find a replacement site up to a limitation imposed by law.
- Item 4 allows space for claimant remarks.
- Item 5 requires claimants' signature(s).
- Section two is for the internal review and approval of payment by the displacing agency.

**Schedule D (Reestablishment Expenses – Nonresidential):**

- Items 1 and 2 are for internal control.
- Item 3 requires a listing of expenses that are eligible for reimbursement under the law.
- Item 4 allows space for claimant remarks.
- Item 5 requires claimants' signature(s).
- Section two is for the internal review and approval for payment by the agency.

**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 and specifically how this collection meets GPEA requirements.**

The claim forms are available electronically and are fillable, but must be printed and signed with an original signature by each claimant. Each claim for reimbursement represents the facts and conditions of an individual event and, therefore, the information is not available from any other source. The form is identified as a Government Paperwork Elimination Act transaction and is available on the internet for downloading and printing.

**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.**

The information collected involves the application for benefits from a specific source, and there is no duplication. Further, the claimant must certify, in Item 16 of the Form DI-381 and in Item 15 of the Form DI-382, that they have not filed duplicate claims.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

This collection only impacts small businesses that are being displaced as a result of Federal real estate acquisition. It does not have a significant economic impact on other small businesses or 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 is collected specifically to provide relocation benefits to individuals and businesses displaced as a result of Federal real estate acquisition. The information is collected only at the time of application for benefits. If the collection activity were not performed, affected parties would not receive appropriate compensation as authorized by Public Law 91-646.

**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.**

No. The collection is made only at the time of application for benefits.

- **Requiring respondents to prepare a written response to a collection of information in fewer**

than 30 days after receipt of it.

No.

- **Requiring respondents to submit more than an original and two copies of any document.**

No.

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

No.

- **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.**

No.

- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.**

No.

- **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.**

No.

- **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.**

No.

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 in response to the PRA statement associated with the collection over the past three years] 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.**

On April 26, 2018, the Office of the Secretary's Office of Acquisition and Property Management published in the Federal Register (83 FR 18342) a notice requesting comments from the public regarding the need for the collection of information, the accuracy of the burden estimate, ways to enhance the information collection, and ways to minimize the burden on respondents. This notice gave the public 60 days in which to comment; however, no comments were received.

In addition, bureaus engaged in consultation with a sample of 4 potential respondents. Each potential respondent was provided a sample form and asked to read the instructions, complete the form, and track the time required to complete it. These respondents provided the following comments:

Jason Kirby, 67 Kipling Street, Denver, CO 80225, 303-445-2895, completed Form DI-381 in 55 minutes.

Karen Montgomery, 2800 Cottage Way, Sacramento, CA 95825, completed Form DI-381 in 47 minutes.

Harrison Putnam, 5275 Leesburg Pike, Falls Church, VA 22041, completed Form DI-382 in 38 minutes.

Tyler Ferguson, 601 NW 8<sup>th</sup> Place, Gainesville, FL 32612, 352-582-4391, completed Form DI-382 in 60 minutes.

Based on the responses, the average time to complete the forms, rounded to the nearest minute, was 50 minutes. This includes the time for collecting, reviewing, and reporting the data. The variability in time is largely explained by different levels of complexity experienced in varying relocation situations, and is deemed representative of what others may encounter. For this reason, a simple average of these times rounded to the nearest minute was used to determine the overall expected burden.

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

Relocation payments are authorized by Public Law 91-646 as a result of Federal real estate acquisition.

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

Because this information collection involves Privacy Act system of records, DOI—02, Interior Relocation Assistance Program Records is in effect for these records.

**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.**

Not applicable. Sensitive questions are not asked.

**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.
- 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.

**a. Total Estimated Burden Hours**

Both forms are very similar in the information requested. The average time to gather the information and complete the forms was 50 minutes (0.83 hours).

Form No.	No. of Respondents	Frequency of Responses per Respondent	Total Annual Responses	Time per Response	Burden Hours
DI-381	19	1	19	0.83 hours	16
DI-382	5	1	5	0.83 hours	4
Total	24		24		20

**b. Total Estimated Annualized Cost**

Using a wage factor of \$25.39 per hour, the cost for each respondent is \$21.07, for a total cost for all 24 respondents of \$505.68.

This hourly rate of \$25.39 was derived by applying the most currently available Bureau of Labor Statistics (BLS) median wage for All Occupations, \$18.12, and multiplying it by 1.4 to derive the amount including benefits. This information is based on U.S. Department of Labor BLS online sources including the National Compensation Survey and the most recent chart available at the following URL:

[http://www.bls.gov/oes/current/oes\\_nat.htm#b-00-0000](http://www.bls.gov/oes/current/oes_nat.htm#b-00-0000).

**13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)**

- 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 [including filing fees paid]. 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.**

**a. Annualized Capital and Start-up Costs.**

Not applicable. There are no annualized capital costs or start up costs.

**b. Operations and Maintenance Costs**

Not applicable. There are no operations and maintenance costs.

**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.**

A Departmental employee spends approximately 1.5 hours conducting a review and processing the information per respondent.

The total burden hours for the Departmental bureaus to process all responses is 1.5 hours x 24 responses = 36 hours.

The total estimated labor cost to the Federal Government for the review and analysis of documentation is 36 hours x \$52.35, or \$1884.60, which includes the average nationwide hourly pay rate for Federal employees at the average grade level of GS-11 step 5 (\$34.90 derived from <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2018/general-schedule/>) multiplied by a factor of 1.5 to include the costs of benefits. Additional figures are estimates for Prepare Disbursement and for Admin/Supplies, below, yielding the total anticipated Federal burden of \$2,785.

<b>ITEM</b>	<b>Estimated Cost</b>
Review and Analyze Documentation	\$1,885
Prepare Disbursement	\$400
Admin/Supplies	\$ 500



Total	\$2,785
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**15. Explain the reasons for any program changes or adjustments in hours or cost burden.**

There is a decrease in the total burden hours. This adjustment is due to a reduction in the number of respondents as a result of reduced real estate acquisition funding levels.

**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.**

There are no plans for publication.

**17. If seeking approval to not display the expiration date for OMS approval of the information collection, explain the reasons that display would be inappropriate.**

The Department will display the OMB control number and expiration date on all forms.

**18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”**

There are no exceptions to the certification statement.