

Department of the Treasury
Information Collection Request – Supporting Statement A

Emergency Rental Assistance Program Grantee Survey
OMB No. – 1505-0268

A. Justification

1. Circumstances necessitating the collection of information

Justification for Emergency Processing:

On December 27, 2020, the President signed the Consolidated Appropriations Act, 2021 (the “Act”). Division N, Title V, Section 501(a)(1) of the Act provides \$25 billion for the U.S. Department of the Treasury (Treasury) to make payments to States (defined to include the District of Columbia), U.S. Territories (Puerto Rico, U.S. Virgin Islands, Guam, Northern Mariana Islands, and American Samoa), Indian tribes or tribally designated housing entities, as applicable, the Department of Hawaiian Homelands, and certain local governments with more than 200,000 residents (collectively the “eligible grantees”) to provide financial assistance and housing stability services to eligible households.

Treasury is seeking approval for a one-time brief on-line survey of ERA grantees to capture summary information on the utilization of federal ERA grant assistance to date in order to better understand the pace and characteristics at the local level. The survey seeks information on grantee’s current and planned rental assistance programming, plans for launching their ERA program, program activities to date, and their preferences regarding technical assistance to be provided by Treasury.

Due to the need to gather important grantee-level program information to help inform our reporting process and the types of assistance Treasury may provide to the grantee in implementing their project. Treasury requests emergency processing and approval on March 15, 2021 to be able to make the survey available online for grantees on March 16. Given the inability to seek public comment during such a short timeframe, Treasury requests a waiver from the requirement to publish notice in the Federal Register seeking public comment.

ERA Grantee Survey

Treasury developed the ERA Grantee Survey to capture summary information on the utilization of federal ERA grant assistance to date. The survey also asks questions to facilitate technical assistance for the recipients’ implementation of the ERA program.

2. Use of the data

The information reported will allow Treasury capture summary information on the utilization of federal ERA grant assistance to date in order to understand the pace and characteristics at the local level. The survey seeks information on grantee’s current and planned rental assistance

programming, plans for launching their ERA program, program activities to date, and their preferences regarding technical assistance to be provided by Treasury.

The ERA grantee survey will be open to 100% of the eligible audience. The potential universe of respondents includes 740 governmental entities that have received ERA grants categorized as shown in the table below.

The survey will be voluntary, and we estimate that at least 60 percent of the grantees will respond within the requested response period. To encourage grantees to respond, we plan to send a follow-up email note to grantees that have not responded as of 6 days prior to the due date, reminding them to respond by the deadline.

ERA Grantee Category	Number of ERA Grantees
Local government agencies	382
State + District of Columbia government agencies	51
Tribal government agencies	302
Territory government agencies	5
TOTAL	740

3. Use of information technology

Treasury will administer the survey using existing and widely available technology including email as well as an online web form.

4. Efforts to identify duplication

This information does not overlap with any other data collected under any other information collections at Treasury. Furthermore, the information collection is tailored to leverage data that already exists and require only additional data as necessary.

5. Impact on small entities

The survey will minimally affect small entities. However, Treasury will attempt to minimize burden on small entities to the greatest extent practicable.

6. Consequences of less frequent collection and obstacles to burden reduction

This would be a one-time data collection. Treasury will collect only the information needed at this early point in the program to capture summary information on the utilization of federal ERA grant assistance to date in order to understand the pace and characteristics at the local level. The grantees will submit a limited amount of information that should be readily available to them in the ordinary course of business.

7. Circumstances requiring special information collection

There are no special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

8. Solicitation of comments on information collection and justification for expedited processing pursuant to 5 C.F.R. § 1320.13

This ICR is being submitted under emergency clearance procedures in order to expedite the provision of technical assistance of their programs and to understand their utilization of the ERA funds received to date. As such, advance public notice and comment is not possible.

9. Provision of payments to respondents

No payments or gifts are provided to respondents.

10. Assurance of confidentiality

Information collected will be kept confidential to the extent appropriate and consistent with the Freedom of Information Act and other applicable laws.

11. Justification of sensitive questions

No sensitive questions will be asked of ERA grantees.

12. Estimate of the hour burden of information collection.

The recipient payment information form, and ERA survey burden estimate is as follows:

Reporting	# Respondents	# Responses Per Respondent	Total Responses	Hours per response	Total Burden in Hours	Cost to Respondent (\$47.50 per hour*)
ERA survey	740	1	740	1 hour	740	\$35,150
Total	740		740		740	\$35,150

* Bureau of Labor Statistics (BLS), U.S. Department of Labor, Occupational Outlook Handbook, Accountants and Auditors, on the Internet at <https://www.bls.gov/ooh/business-and-financial/accountants-and-auditors.htm> (visited December 30, 2020). In 2019, the median pay for accounts and auditors was \$34.40/hour. To account for the fully-loaded employer cost of employee compensation, the median pay is increased by 38%, resulting in a fully-loaded wage rate of \$47.50. According to BLS’s Employer Cost for Employee Compensation from September 2020 (released on December 17, 2020: <https://www.bls.gov/news.release/pdf/ecec.pdf>), employers provided 38% of total employee compensation in the form of non-wage compensation (i.e., benefits such as paid leave, health insurance, etc.) for state and local government workers.

13. Estimated total annual cost burden to respondents

This would be a one-time data collection. There are no annualized capital/startup costs for the recipients to provide the information via the online form.

14. Estimated cost to the federal government.

As this is a new COVID relief program being implemented by Treasury in response to emergency circumstances, Federal costs have not been estimated yet.

15. Reasons for change in burden

This collection of information does not reflect a change in any previous burden.

16. Plans for tabulation, statistical analysis and publication

Treasury does not plan to implement statistical analysis on this data or to publish.

17. Display of the expiration date for OMB approval

Treasury plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Exceptions to submission requirements

There are no exceptions to the submission requirements.

Part B. Describe the use of statistical methods such as sampling or imputation.

This collection does not employ statistical methods.