

**Supporting Statement for Paperwork Reduction Act Submissions  
Collection of Required Information for CARES Act Quarterly Reporting  
(OMB# 2535-xxxx)**

**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.

This information collection request will enable the U.S. Department of Housing and Urban Development (HUD) to collect from recipients of large covered funds, which are defined as CARES Act grants that exceeds \$150,000 in aggregate, the quarterly information required to be in compliance with the following requirements outlined in section 15011 of the CARES Act:

“(2) Not later than 10 days after the end of each calendar quarter, each covered recipient shall submit to the agency and the committee a report that contains

(A) the total amount of large covered funds received from the agency;

(B) the amount of large covered funds received that were expended or obligated for each project or activity;

(C) a detailed list of all projects or activities for which large covered funds were expended or obligated, including

(i) the name of the project or activity;

(ii) a description of the project or activity; and (iii) the estimated number of jobs created or retained by the project or activity.”

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.

This is a new collection, that is referencing existing OMB control numbers, with proposed modifications to help improve compliance with CARES Act requirements. This information will be reported by the grant recipients to the program offices within HUD, then aggregated with the related information already being captured today. This aggregated information will form the required quarterly reporting for CARES Act funds that HUD submits to the Pandemic Response Accountability Committee (PRAC). This requirement is outlined in Section 15011 of the CARES Act and is listed in response to question 1 above.

This information is currently reported to the programs annually by each recipient after their fiscal year-end, with the actual use of the information currently collected being part of the report submitted to the PRAC to satisfy the reporting requirements outlined in the CARES Act.

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.

This collection of information will leverage the existing information technology systems and reporting channels that are currently used by HUD's program offices. There will be new capture forms created for this process, though these quarterly reporting forms will be abbreviated versions of the annual forms currently in place. This is to ensure there are not multiple forms using the same OMB and other control numbers. This approach is purposefully being used to minimize any increase in the burden placed on program recipients regarding this effort.

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.

An assessment was performed on the information currently available. This found that the information available today is not being captured at the required level of detail and/or at the frequency specified in the CARES Act Legislation, and therefore this collection effort would not result in any duplication of efforts. For the programs that currently capture the required information annually, this collection request would enable them to capture this information quarterly in order to satisfy the CARES Act Legislation.

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.

Not applicable, as this would not have an impact on 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.

Without this effort, HUD will not be in compliance with the quarterly requirements outlined in the CARES Act. At this time, no explicit consequences for failing to meet the reporting requirements outlined in the CARES Act have been communicated.

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 than quarterly; **Not applicable.**

- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

**Not applicable, as the frequency and cadence of the established quarterly reporting timelines are outlined in the CARES Act, which is stated as 10 days after the end of the quarter. As all reporting deadlines are already established, there would not be a request with less than 30 days' notice.**

- requiring respondents to submit more than an original and two copies of any document;

**Not applicable.**

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

**Not applicable.**

- 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;

**Not applicable.**

- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

**Not applicable.**

- 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

**Not applicable.**

- requiring respondents to submit proprietary trade secret, 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.

**Not applicable.**

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

A notice requesting public comments for 7 day emergency was published in the Federal Register on TBD, Volume TBD, Number TBD, Page TBD. TBD comments were received.

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

Not applicable, as there are no payments or gifts to respondents of this collection effort.

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

There are no assurances of confidentiality provided or needed for these collections.

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, as this collection effort does not solicit any information of a sensitive nature as described above.

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 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; 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.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
CDBG	1,209	3	3,627	14.18	51,445	35.16	1,808,794
ESG	2,360	3	7,080	2.94	20,832	39.96	832,428
HOPWA	128	3	384	6.97	2,676	25.35	67,849
TOTAL	3,697	3	11,091		74,953		\$2,709,071

**\*Please note:** The table above is only reflective of the existing PRAs for CPD programs, with the total current number potential respondents across all HUD programs (based on the obligations data from USASpending.gov as of March 4, 2021) is estimated to be 5,000.

Estimated Number of Respondents:

The respondents for this information collection request are the HUD program recipients who received large covered funds provided by the CARES ACT, which is defined in the CARES Act as those who receive CARES Act Grant amounts over \$150,000.

For CPD specifically, the estimate of ~3,700 respondents used for this calculation is based on the total number of recipients currently providing this information annually. This estimation is likely much greater than the total number of recipients who will ultimately meet the large covered funds reporting threshold, which is ~1,550 recipients based on the obligations data from USASpending.gov as of March 4, 2021.

Frequency of Response:

This requested modification is to move from capturing the performance information from an annual basis to a quarterly basis, which would increase the frequency by three.

Average Hours per Response:

These values were calculated for each program based on the specific fields required for each of the performance measures, then applied to the previously submitted estimates contained in the existing PRAs (OMB Control numbers: 2506-0133, 2506-0089, 2506-0077) for each program.

Total Estimated Burdens:

The total annual burden is estimated to be \$2,709,071, which uses the estimated hourly costs provided in the existing PRAs (OMB Control numbers: 2506-0133, 2506-0089, 2506-0077) for each program.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers 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 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;

Not applicable, as there are no additional costs associated with this collection.

- 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.

Not applicable, as there are no additional costs associated with this collection.

- 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.

Not applicable, as there are no additional costs associated with this collection.

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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Not applicable, as this proposed collection uses existing processes and would be performed in conjunction with other quarterly reporting process performed today.

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

This is a new collection, that is referencing existing OMB control numbers, with proposed modifications to help improve compliance with CARES Act requirements.

16. For collection 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 obtained as a result of this collection request will be included in the required quarterly submission to the PRAC, as outlined in section 15011 of the CARES Act as “not later than 30 days after the end of each calendar quarter, the Committee, in consultation with the agency that made large covered funds available to any covered recipient shall make the information in reports submitted under paragraph (2) publicly available by posting the information on the website established under section 15010(g). “

The CARES Act further outlines the process by which information from these quarterly reports will be made available to the public through the following process:

- “The Director of the Office of Management and Budget, in consultation with the Secretary of the Treasury, the Administrator of the Small Business Administration, and the Chairperson of the Council of Economic Advisors, shall submit to the appropriate congressional committees and publicly release on the website established under section 15010(g) quarterly reports that detail the impact of programs funded through large covered funds on employment, estimated economic growth, and other key economic indicators, including information about impacted industries.”

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.

Not applicable, as HUD is not seeking approval for this.

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

Not applicable, as there are no exceptions to the certification statement from item 19