

Supporting Statement for Paperwork Reduction Act Submissions
Closeout Instructions for Community Development Block Grant Programs (CDBG)
OMB #2506-0193

Justification

1. Why is the information necessary?

This information collection is being conducted by HUD's Community Planning and Development Office of Block Grant Assistance (CPDOBGA) to assist HUD in determining, as required by Section 104 (e) of the Housing and Community Development Act of 1974 (HCDA), and outlined in Subpart I (for States) and Subpart J (for entitlements) of the CDBG regulation, whether Grantees, (Entitlement communities, States and units of general local governments) have carried out eligible activities and its certifications in accordance with the statutory and regulatory requirements governing State CDBG, CDBG-R, Disaster Recovery, Neighborhood Stabilization Program (NSP) 1, NSP2 and NSP 3 grants prior to closing the grant allocation.

The submission of the HUD 7082 – *Funding Approval Form* is necessary as the form is the Grant Agreement between the Department of Housing and Urban Development (HUD) and the Grantee and is made pursuant to the authority of the HCDA, as amended, (42 USC 5301 et seq.). HUD will make the funding assistance as specified to the grantee upon execution of the Agreement. We request the paperwork approval because the funding approval form is a vehicle for standardizing the agreements between HUD and each of its grantees.

2. What information is to be collected?

Section 104(e)(1) of the HCDA requires HUD to make reviews and audits as necessary or appropriate to determine if applicable administrative and program requirements have been completed by the grantee before a grant may be closed. The HUD field office will prepare and send a closeout package that includes a transmittal letter, grant closeout agreement, grantee closeout certification and a closeout checklist to the grantee via email or standard mail, and is a vehicle for standardizing the agreements between HUD and each of its grantees.

Transmittal letter- HUD will prepare a closeout notification to inform the grantee regarding grant closeout.

Grant closeout agreement- HUD will prepare a Grant Closeout Agreement for the grantee's signature, acknowledging the completion of the grant, certifying that all requirements have been met, and setting forth any other provisions as may be determined by the parties to the grant agreement.

Grantee closeout certification – The grantee certifies that the approved grant was performed in accordance with the terms and conditions of the executed grant agreement.

Closeout checklist- The Grantee uses this closeout checklist to certify that all requirements of the grant have been completed.

The grantee is given 15 days to return the completed documentation back to the HUD field office to officially closeout the grant. The information in the closeout package will assist the Department in determining whether all requirements of the contract between the Department and the Grantee have been completed.

HUD 7082 – Funding Approval Form:

Prior to a Grantee receiving HUD Community Development Block Grant funds the HUD 7082 Funding Approval form must be reviewed, completed, and submitted to the Department.

3. Is the information submitted electronically? If not, why?

A PDF copy of the HUD 7082 Funding Approval form and the closeout package can be submitted to the HUD field office electronically (via email) if the grant closeout agreement, the certification, review checklist have the official's authorized signature. Submitting this information electronically reduces the burden of printing paperwork and manually mailing the documents.

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

No, this information is not collected elsewhere.

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

There will be no impact on small businesses or other small entities. HUD makes grants to entitlements cities and counties, States, and non-entitlement counties in Hawaii. CDBG grantees make the necessary reviews and audits to ensure that statutory and regulatory requirements governing the CDBG grants have been satisfied prior to closing a CDBG grant. Local governments receiving subgrants from the State are required to provide the State with the information the State needs to document that each proposed activity is eligible and meets a national objective and the State reports information to HUD on the use of CDBG funds in the Integrated Disbursement and Information System (IDIS) or the Disaster Recovery Reporting System (DRGR). Non-entitlements and nonprofits that are direct recipients of NSP 2 funds are responsible in implementing their NSP programs according to the requirements of the program. If they are in need of technical assistance (TA) a grantee can request TA from the HUD field office or make a request online at the NSP Resource Exchange.

To minimize the collection burden on the grantee the HUD field office will prepare the *HUD 7082 – Funding Approval Form* and the grantee will review, sign, and return the form to the HUD field office.

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.

If no records are collected CDBG program performance/regulatory compliance will not be determined. The information being collected is the minimum necessary to assist the Department in achieving an efficient and standard method to closeout CDBG grants and execute contracts in accordance with the provisions of the Grant Agreement.

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;**

The proposed request is to report annually.

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

The request asks for annual submittal of data, at least 30 days after the end of the reporting year.

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

There is no requirement to submit more than an original and two copies of any document.

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

All CDBG records must be retained for three years post grant close out per federal regulations.

- * **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;**

The information requested is not 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.

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

The information requested does not require the use of a statistical data classification that has not been reviewed and approved by OMB.

- * **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;**

The information requested does not require 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.

- * **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.**

The information requested does not require 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.

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.

HUD published a notice describing the Paperwork Reduction Act Submission in the Federal Register on July 29, 2021 (Vol.86, No.143, page 40867) for 60 days. No comments were received.

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

Not applicable. No payment or gifts are provided to any respondents for any information.

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

24 CFR 570.508 of the CDBG regulations states that grantees shall provide citizens with reasonable access to records regarding the past use of CDBG funds, consistent with applicable State and local laws regarding privacy and obligations of confidentiality.

24 CFR 570.490(c)(2) of the CDBG regulations states the State shall provide citizens with reasonable access to records regarding the past use of CDBG funds and ensure that units of general local government provide citizens with reasonable access to records regarding the past

use of CDBG funds consistent with State or local requirements concerning the privacy of personal 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.

The collection request does not include any sensitive questions.

12. Provide estimates of the hour burden of the collection of information. Provide estimates of the hour burden of the collection of information

Grant Closeout Form

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
States Total	182.00	1.00	182.00	3.00	546.00	\$41.78	\$22,811.88
Counties in Hawaii Total	3.00	1.00	3.00	3.00	9.00	\$41.78	\$376.02
Entitlement Total	1,490.00	1.00	1,490.00	3.00	4,470.00	\$41.78	\$186,756.60
Non-entitlement Total	32.00	1.00	32.00	3.00	96.00	\$41.78	\$4,010.88
Non-Profits and Quasi-public Total	20.00	1.00	20.00	3.00	60.00	\$41.78	\$2,506.80
Funding Approval Total	1,727.00	1.00	1,727.00	3.00	5,181.00	\$41.78	\$216,462.18

Funding Approval/Agreement 7082 Form

Information	Number of	Frequency	Responses	Burden	Annual	Hourly	Annual Cost
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Collection	Respondents	of Response	Per Annum	Hour Per Response	Burden Hours	Cost Per Response	
State Total	132.00	1.00	132.00	0.25	33.00	\$41.78	\$1,378.74
Counties in Hawaii Total	3.00	1.00	3.00	0.25	0.75	\$41.78	\$31.33
Entitlement Total	1,399.00	1.00	1,399.00	0.25	349.75	\$41.78	\$14,612.55
Nonentitlement Total	32.00	1.00	32.00	0.25	8.00	\$41.78	\$334.24
Nonentitlement Direct Grantees Total	32.00	1.00	32.00	0.25	8.00	\$41.78	\$334.24
Funding Approval Total	1,598.00	1.00	1,598.00	0.25	399.50	\$41.78	\$16,691.11

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

No other costs than stated in #12 above.

14. Provide estimates of annualized costs to the Federal government. Provide estimates of annualized costs to the 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
Grant Closeout/Form 7082	3,325.00	1.00	3,325.00		5,581.00	\$41.78	\$233,174.18

**GS 12, step 1 (2021 OMB tables)

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

This is a reinstatement without change however the hourly costs increased based on the 2021 FY.

16. For collections of information whose results will be published, outlined plans for tabulation and publication.

The information collected is not for statistical use nor does the collection uses statistical methods.

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.

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

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

There are no exceptions to the signed certification.