

**Supporting Statement for Paperwork Reduction Act Submissions
Coronavirus Aid, Relief, and Economic Security (CARES) Act Reporting
Information Collection Request
OMB# 2535-0123**

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 Coronavirus Aid, Relief, and Economic Security (CARES) Act grants that exceed \$150,000 in the 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 reinstatement of multiple currently approved Information Collection Request (ICRs) referencing existing Office of Management and Budget (OMB) control numbers 2506-0133, 2506-0089, and 2506-0077, 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 requirement is outlined in Section 15011 of the CARES Act and is listed in response to question 1 above.

For the referenced Community Planning and Development (CPD) Programs; Community Development Block Grants (CDBG), Emergency Solutions Grants (ESG), Housing Opportunities for Persons with AIDS (HOPWA); this information is currently reported to the programs annually by each recipient after their fiscal year-end under currently approved ICRs. This reinstatement will modify the reporting frequency for those grantees that receive CARES Act funding above the \$150,000 threshold from annually to quarterly. CDBG is already authorized to collect the required reporting data on a quarterly basis under its existing ICR.

For the referenced Public and Indian Housing (PIH) programs, a new reporting portal is under development and when operational, will enable collection capabilities that are compliant with CARES Act Requirements. This will be a new collection effort once implemented under existing OMB control number 2535-0123.

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 CPD's program offices. This approach is purposefully being used to minimize any increase in the burden placed on program recipients regarding this effort.

PIH does not currently have sufficient systems in place to carry out the collection requirements outlined in the CARES Act. To remedy this, a new data capture mechanism is being created for this process in the form of a reporting portal.

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 assessment found that the information available today is not being captured at the required level of detail (activity level) and/or at the frequency (quarterly) specified in the CARES Act, and therefore this collection effort would not result in any duplication of efforts. For the Community Planning and Development (CPD) programs that currently capture the required information annually (ESG, HOPWA), this collection request would enable them to capture this information quarterly to satisfy the reporting requirements laid out in the CARES Act.

The reporting portal currently in development for PIH is a net new reporting capability and will not create any duplicate efforts.

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 collection of information 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.

- 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 60 days was published in the Federal Register on 10/05/2021, Volume 86, Pages 54995-54996. Comments were received but did not materially affect the information contained in the information collection request.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration 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. The Privacy Act of 1974 provided privacy protection to respondents.

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	4	4,836	78.5	379,626	35.16	13,347,650.16
ESG	2,360	4	9,440	12.75	120,360	39.96	4,809,585.60
HOPWA (HUD-40110-C)	128	4	512	41	20,992	25.35	532,147.20
HOPWA (HUD-40110-D)	116	4	464	55	25,520	25.35	646,932.00
IHBG	792	4	3,168	1	3,168	25	79,200.00
TBRA/Op Fund	1,230	4	4,920	2	9,840	35.16	345,974.40
TOTAL	5,835	4	23,340		559,506		\$19,761,489.36

***Please note:** The CPD programs (CDBG, ESG, and HOPWA) in the table above reference existing ICRs under control numbers 2506-0113, 2506-0089, and 2506-0077. The PIH programs (IHBG, TBRA, Op Fund) will leverage the existing ICR under control number 2535-0123 to implement a new reporting portal.

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 currently.

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

For the CPD programs, this is a reinstatement of currently approved ICRs with the only change being the increase in reporting frequency from annual to quarterly via existing reporting systems. The PIH portal in development will create a new reporting capability. Both efforts are being made to facilitate compliance with CARES Act legislative 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 any required reporting to the Pandemic Response Accountability Committee or Congress.

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.
