

Department of the Treasury
Information Collection Request – Supporting Statement

Homeowner Assistance Fund
OMB No. 1505-0269

Part A. Justification

1. Circumstances necessitating the collection of information

On March 11, 2021, the President signed the American Rescue Plan Act of 2021 (the “Act”), Pub. L. No. 117-2. Title III, Subtitle B, Section 3206 of the Act established the Homeowner Assistance Fund and provides \$9.961 billion for the U.S. Department of the Treasury (Treasury) to make payments to States (defined to include the District of Columbia, Puerto Rico, U.S. Virgin Islands, Guam, Northern Mariana Islands, and American Samoa), Indian tribes or tribally designated housing entities, as applicable, and the Department of Hawaiian Home Lands (collectively the “eligible entities”) to mitigate financial hardships associated with the coronavirus pandemic, including for the purposes of preventing homeowner mortgage delinquencies, defaults, foreclosures, loss of utilities or home energy services, and displacements of homeowners experiencing financial hardship after January 21, 2020, through qualified expenses related to mortgages and housing.

Section 3206(c)(1) requires the eligible entities to use the funds for the purpose of preventing homeowner mortgage delinquencies, defaults, foreclosures, loss of utilities or home energy services, and displacements of homeowners experiencing financial hardship after January 21, 2020, through qualified expenses related to mortgages and housing. Section 3206(e)(1) provides that not later than 45 days after March 11, 2021, the Secretary shall pay each eligible entity. To date, eligible entities have generally received 10% of their allocations.

Acceptance of Award Terms Form

An eligible entity that elects to receive payment under the Homeowner Assistance Fund must complete and sign a form that will indicate its agreement to the award terms, including the requirement for Treasury to reallocate funds pursuant to section 3206(e)(2). Treasury does not have rulemaking authority with respect to this program, so it must obtain the agreement of eligible entities to require them to comply with these provisions.

Recipient Payment Information Form

In order to ensure proper payment by Treasury, each eligible entity must supply basic identifying and bank routing information. This information should be readily available to officials completing the form.

Notice of Funds Request Form

In the event Treasury staff or the entities themselves cannot make the deadline to begin making payments within 45 days of legislation, this form will be used so entities can notify Treasury of their request to apply at a later date.

Assurances of Compliance with Title VI of the Civil Rights Act of 1964

As a condition of receipt of federal financial assistance from Treasury, eligible entities under the HAF program are required to provide assurances pursuant to 31 C.F.R. § 22.5 that they will comply with the requirements of Title VI of the Civil Rights Act of 1964 and Treasury's Title VI implementing regulations, which prohibit discrimination on the basis of race, color, or national origin in all programs or activities receiving federal financial assistance.

Grantee Plan Templates

Eligible entities must complete either the Homeowner Assistance Fund Plan or Homeowner Assistance Fund Plan For Participants With Allocations Under \$5M, as well as the Sample Term Sheets. These documents are essential planning and implementation forms designed to ensure statutory compliance and the tailoring of discretionary program policies to each jurisdiction's needs. The completion of this process is a prerequisite to an eligible entity receiving the remainder of its funds and, accordingly, the delivery of urgently needed assistance to homeowners.

Compliance Reports

Treasury will collect from each eligible non-tribal recipient a one-time Interim Report that will provide Treasury with high-level information on obligations, spending, and the number of households impacted by the program.

2. Use of the data

The information reported will allow Treasury to ensure proper payments to the eligible entities.

Further, the information will permit Treasury to confirm an eligible entity has engaged in appropriate planning and adopted implementation policies that will ensure compliance with legal requirements and facilitate the most effective use of program funds. These confirmations will include the eligible' entity's (i) completion of appropriate outreach activities to determine the jurisdiction's relative needs for assistance to meet mortgage loan, utility, and property charge (e.g. taxes; condominium fees; common area assessments) expenses; (ii) that assistance will be awarded in a fair, equitable, and effective manner to meet such needs; (iii) appropriate focus on ensuring the delivery of assistance to socially disadvantaged individuals, including affirmative efforts to increase awareness and access to homeowners with limited English proficiency; (iv) adoption of meaningful performance metrics to ensure program effectiveness; and (v) cognizance of budgetary restraints.

3. Use of information technology

Treasury will manage the submission process with the use of existing and widely available technology such as a web portal and e-mail.

4. Efforts to identify duplication

The information collections are under new statutory mandates. The information is not known to 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 that is necessary.

5. Impact on small entities

This collection of information will minimally affect small entities. However, Treasury will attempt to minimize burden on small entities to the greatest extent practicable. Note the Template captioned “Homeowner Assistance Fund Plan For Participants With Allocations Under \$5M” has been developed specifically for this purpose.

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

Treasury will collect only the information required to make any payments to the eligible entities. The eligible entities will submit a limited amount of information that should be readily available to the entity in the ordinary course of business. If the eligible entities are unable to provide their completed Templates, Treasury would not be able to make payment to those eligible entities of their remaining allocations of HAF Funds.

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

On August 12, 2021, Treasury published a notice in the Federal Register at 86 FR 44478, soliciting public review and comment for a 60-day period.

Treasury received 1 comment from an Independent Living Specialist, who thanked Treasury for the guidance on HAF and ERA. The commentor requested that Treasury and other Federal Agencies consider “spend downs” required to be eligible for benefits, such as Medicaid and SSDI, when determining payback options. Additionally, the commentor noted that obtaining benefit paperwork is difficult while Federal and State Agencies are working remotely. The commentor recommended using prorated repayment based on current employment and benefits.

Treasury would like to thank the commentor for these thoughtful insights. Based on the comments, Treasury will review and follow-up if there are applicable feedback or questions.

Separately, Treasury intends to do public commenting on the quarterly reports.

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 eligible entities.

12. Estimate of the hour burden of information collection.

The estimated burden for collecting and reviewing the Recipient Payment Information, Notice of Funds Request Form, Acceptance of Award Terms forms, Title VI Assurances, HAF Plan Templates, and the Interim Report, are as follows:

Reporting	# Respondents	# Responses Per Respondent	Total Responses	Hours per response	Total Burden in Hours	Cost to Respondent (\$47.50 per hour*)
Acceptance of Award Terms Form	651	1	651	0.25 (15 minutes)	163	\$7,743
Notice of Funds Request Form	651	1	651	0.25 (15 minutes)	163	\$7,743
Recipient Payment Information Form	651	1	651	0.25 (15 minutes)	163	\$7,743
Title VI Assurances	651	1	651	.50 (30 minutes)	326	\$15,486

Term Sheet	651	1	651	1 hour	651	\$30,923
HAF Plan Templates	651	1	651	2 hours	1,302	\$61,845
Interim Report	651	1	651	2 hours	1,302	\$61,845
Total	651	7	4,557	Varies	4,070	\$193,328

* 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

There are no annualized capital/startup costs for the eligible entities to provide the information in the form or certification.

14. Estimated cost to the federal government.

There will be no annualized capital/start-up costs for the government to receive this information. The below table reflects the estimated time for a GS-13, Step 1 to review the information collected.

Collection Instrument	Number of Responses	Average Review Time per Response (in hours)	Total Time to Review (in hours)	Average Hourly Wage Rate ¹	Total Annual Government Cost
Homeowner Assistance Fund Compliance Reporting and Recordkeeping	2,604	40	104,160	\$49.68	\$5,174,668
Total	2,604		104,160		\$5,174,668

¹GS-13 wage rate from the 2021 GS-pay scale table for Washington-Baltimore-Arlington, DC-MD-VA-WV-PA, https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2021/DCB_h.pdf ,

15. Reasons for change in burden

The changes since the previous approval include the burden increases of 1,302 hours associated with performing compliance reporting, including the one-time Interim Report.

16. Plans for tabulation, statistical analysis, and publication

Treasury plans to publish the data for disbursements.

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.