U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

WASHINGTON, DC 20410-5000



OFFICE OF PUBLIC AND INDIAN HOUSING

Mr. Tyler Glotfelty OMB Desk Office Office of Management and Budget New Executive Office Building Washington, DC 20503

Dear Mr. Glotfelty:

HUD requests an emergency clearance of an Information Collection Request (ICR) under the Paperwork Reduction Act (PRA). HUD is requiring PHAs submit SF-425s for each grant provided to PHAs from the \$685 million of Supplemental Operating Funds in the Coronavirus Aid, Relive, and Economic Security Act (CARES Act), and to submit supporting documentation for the drawdown of funds. Due to national impact of the coronavirus on HUD and Public Housing Agency operations, and in compliance with the requirements of 5 CFR \$1320.13, this letter requests an information collection for certain information related to the obligation of CARES Act supplemental Operating Funds. This action is essential for HUD to validate that PHAs obligated their CARES Act funds for eligible uses in accordance with program requirements as outlined in Notices PIH 2020-07, PIH 2020-24, and a notice completing departmental clearance.

On March 27, 2020, the CARES Act provided over \$2 trillion in emergency assistance and health care to individuals, families and businesses affected by the COVID-19 pandemic, and emergency appropriations to support Executive Branch agency operations during the COVID-19 pandemic. The CARES Act provided \$685 million of supplemental Operating Funds to PHAs. HUD issued guidance (Notices PIH 2020-07 and PIH 2020-24) on the eligible uses of this supplemental funding, financial management requirements, and other program requirements. The later notice extended the period of performance for CARES Act supplemental Operating Funds to December 31, 2021, due to the ongoing pandemic. HUD is requiring PHAs submit the SF-425 annually until all funds are expended in conformance with 2 CFR 200.328 and 200.344. PHAs that obligated their funds by the deadline but cannot expend the funds until after April 30, 2022 must submit supporting documentation to HUD to obtain HUD's approval before drawing down funds. The supporting documentation will establish that the drawdown is for eligible expenses related to obligations incurred during the period of performance. This emergency PRA relates to both the SF-425 and the supporting documentation related to drawdowns.

HUD requests an emergency approval for this information collection, to comply with the Federal Financial Reporting requirements of 2 CFR Part 200, and to ensure future drawdowns of CARES Act supplemental Operating Funds are limited to only obligations incurred during the period of performance for eligible activities. The Notice proposed for immediate publication in the Federal Register for 7 days, explains the collections and invites public comments.

Following approval of the emergency request, HUD will complete the normal OMB review process and post the 60-Day and 30-Day Federal Register Notices. Future renewals of this ICR will not reference the CARES Act supplemental Operating Funds or the COVID-19 crisis.

In summary, the expedient approval of this emergency processing is necessary to meet OMB reporting requirements and to ensure PHAs obligated the funds for eligible activities on a timely basis. Per 5 CFR 1320.13(a), this information is needed quickly to ensure appropriate use of Cares Act supplemental Operating Funds and to reduce the PHA's financial duress for their actions taken to prevent, prepare for, and respond to coronavirus, including to maintain normal operations during the period the program was impacted by the 2019 coronavirus.

Thank you for your consideration and assistance.

Sincerely,

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General Deputy Assistant Secretary