# **Supporting Statement for Paperwork Reduction Act Submissions**

Electronic Line of Credit Control System (eLOCCS) System Access Authorization Form Collection (OMB# 2535-0102)

#### A. Justification

- 1. This information collection is necessary to establish grantee access to the eLOCCS payment system. This provides Grant recipients the ability to receive payments. The attached copy of 2 CFR 200.305 prescribes the basic standard and methods under which a Federal agency will make payments to grantees.
- 2. Grant recipients provide information for the applicable HUD program with all the necessary information. They process this request for payment through the Electronic Line of Credit Control System (eLOCCS System.) Respondents submit payment requests directly to HUD. The information that is submitted is used to establish access to the eLOCCS system. This information is also used as an internal control feature that's instituted to support and safeguard Federal funds, as well as provide a service to the recipients.
- 3. eLOCCS provides a fast, reliable method for recipients to obtain Federal funding. This technology method allows the recipient to know before the end of the call whether their request will be paid, who to call if there is a problem, or if the request was not processed by the system. All requests processed by the system are paid by ACH within 48 hours. A link to the LOCCS Program Area Codes is on the instructions page of the HUD-27054E form.
- 4. Each request for funds distribution is unique. Only the identifying elements are duplicated to establish access. Similar information already available cannot be used or modified for use for the purposes described in Item 2 above, because this access form serves as an access agreement between HUD and the grantee.
- 5. There is no impact to small entities. In addition, the HUD-27054E form is only two pages and takes a few minutes to complete, therefore there is minimal burden for entities of any size.
- 6. The collection of the eLOCCS access form allows for grantees to be granted access to the eLOCCS system so that they can receive funds. They cannot receive funds without eLOCCS access. Not completing the form will cause delays. Lastly, HUD-27054E serves as an access agreement, therefore it must be completed prior to the grantee receiving access.
- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner: There are no special circumstances that apply to this information collection.
  - requiring respondents to report information to the agency more than quarterly; N/A

- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; **N/A**
- requiring respondents to submit more than an original and two copies of any document; N/A
- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years; **N/A**
- 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; **N/A**
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB; **N/A**
- 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 **N/A**
- 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. **N/A**
- 8. A notice requesting public comments for 60 days was published in the Federal Register on August 2, 2019, Volume 84, Number 149, Page 37908. No comments were received.
- 9. No payment or gift is provided to respondents by completing the HUD-27054E form alone.
- 10. A Privacy Act Statement is included on the information collection instrument to assure confidentiality in collecting this information. This payment system will require that the latest security features be installed to deter fraudulent payments. Only a limited number of authorized officials will have access to the system for updating purposes.
  - The forms comply with the Privacy Act. The information collected contains no personal or organizational identifiers. Assurance of confidentiality is neither provided nor needed for any of these information collections. Personal identifiable information is covered under the Privacy Act of 1974 (U.S.C. 552)
- 11. The collection does not contain information of a sensitive nature about behavior or attitudes, religious beliefs, or private matters. This type of information is not necessary for the grantee to receive access to eLOCCS.

12. Estimate of the hour burden of the collection of information from the respondents:

### Average Annual Usage

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per	Annual Burden	Hourly Cost Per	Annual Cost
Conection	Respondents	of Response	Per Amium	Response	Hours	Response	
HUD-27054E	2,420.00	1.00	2,420.00	0.17	411.40	\$24.29	\$9,992.91
Total					411.40	\$24.29	\$9,992.91

The annual burden is calculated at the hourly rate of a nonprofit Executive Director position who would complete the form. This data is taken from payscale.com at <a href="https://www.payscale.com/research/US/Job=Executive\_Director/Salary">https://www.payscale.com/research/US/Job=Executive\_Director/Salary</a>, which as of July 18, 2019, shows an hourly rate of \$24.29.

- 13. There are no additional cost associated with this collection.
- 14. Estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information:

### Average Annual Usage

Information Collection	Number of	Frequency	Responses Per Annum	Burden Hour Per	Annual Burden	Hourly Cost Per	Annual Cost
Collection	Respondents	of Response	Per Alliulli	nour Per	Duruen	Cost Per	
				Response	Hours	Response	
HUD-27054E	2,420.00	1.00	2,420.00	0.17	411.40	\$61.77	\$25,412.18
Total	•••••			0.17	411.40	\$61.77	\$25,412.18

2420 responses x .17 burden hour per response x \$61.77 p/hr (GS-13 Step 10, Washington DC Locality as of July 18, 2019) = \$25,412.18.

- 15. This is an extension of a currently approved collection. There were no modifications made to HUD-27054E.
- 16. Results will not be published.
- 17. No exceptions are requested.
- 18. No exceptions.

## **B.** Collections of Information Employing Statistical Methods

N/A