

**Supporting Statement for Paperwork Reduction Act Submissions
(Disaster Recovery Grant Reporting System (DRGR))**

(OMB# 2506-0165)

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.

a. CDBG Disaster Recovery (CDBG-DR), CDBG Mitigation (CDBG-MIT), and National Disaster Resilience Competition (CDBG_NDR)

The Community Development Block Grant (CDBG) program is authorized under Title I of the Housing and Community Development Act of 1974 (HCDA), as amended. According to Section 104(e)(1) of the Act, HUD is responsible for reviewing grantees' compliance with applicable requirements and their continuing capacity to carry out their programs. Program rules are published in the *Federal Register* pursuant to specific appropriation acts. Under this program, HUD provides supplemental CDBG funds appropriated by Congress for recovery from major disasters declared by the President of the United States and for the purpose of mitigation. Each supplemental appropriations statute specifies the disasters or time period of disaster declarations for which funding is available and the purpose of the funding. Due to the multiple purposes Congress has identified in the applicable appropriations, HUD has allocated funds for specific purposes including Community Development Block Grant disaster recovery (CDBG-DR), Community Development Block Grant mitigation (CDNG-MIT) and Community Development Block Grant - National Disaster Resilience Competition (CDBG-NDR). Grant funds are made available to states, units of general local government, Indian tribes, and insular areas, unless provided otherwise by supplemental appropriations statute, based on unmet disaster recovery needs. Unless otherwise restricted by statute or provided by waiver, the funds may be used for any activity eligible under section 105(a) of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 *et seq.*) (HCD Act). Each funded project or activity must also meet a national objective and address a direct or indirect impact from the applicable disaster(s). Unless waived by the applicable *Federal Register* notice, at least 70 percent of the funds must be used for activities that principally benefit persons of low and moderate income. Grantees must report progress quarterly via the web-based Disaster Recovery Grant Reporting (DRGR) system.

This update includes the addition of new CDBG-DR grants added to the DRGR system due to the Public Law 117-43 supplemental appropriations which provided over \$4.9 billion.

This revision updates the previously approved DRGR PRA information collection to account for the increase in burden hours associated grants.

b. Neighborhood Stabilization Program (NSP1, NSP2 & NSP3)

The Neighborhood Stabilization Program (NSP) was established for the purpose of stabilizing communities that have suffered from foreclosures and property abandonment. On July 21, 2010, President Obama signed the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank Act") into law (Public Law 111-203). This law provides \$1 billion of formula grant funding for the redevelopment of foreclosed upon and abandoned homes to be allocated under the terms of Title XII, Division A, Section 2 of the American Recovery and Reinvestment Act ("Recovery Act") and by the formula factors provided in Title III of Division B of the Housing and Economic Recovery Act of 2008 (Public Law 110-289) ("HERA"). In

2008, HERA provided for an initial round of formula funding to regular State and entitlement Community Development Block Grant (“CDBG”) grantees through the Neighborhood Stabilization Program (“NSP1”). The Recovery Act provided for a neighborhood stabilization grant competition open to State and local governments, as well as non-profit groups and consortia that may include for-profit entities (“NSP2”).¹ The Dodd-Frank Act is the third round of Neighborhood Stabilization Funding (“NSP3”).

Although NSP funds are otherwise to be considered CDBG funds, HERA, the Recovery Act and the Dodd-Frank Act make substantive revisions to the eligibility, use, and method of distribution of NSP3 funds. For NSP1 and NSP3, grantees are required to submit substantial amendments to their consolidated plans to secure funding they are entitled to under the formulas.

The applicable section of the Dodd-Frank Act, Recovery Act and HERA are attached to this submission. These statutes, along with the Housing and Community Development Act of 1974, mandate and/or authorize the collection of data in this submission.

NSP statutes are located here: <https://www.hudexchange.info/nsp/nsp-laws-regulations-and-federal-register-notice/>

c. NSP3 Technical Assistance Grants

Authorized under Section 1497 of the Wall Street Reform and Consumer Protection Act of 2010 (Pub. L. 111-203, approved July 21, 2010) (“NSP3”), NSP3 Technical Assistance (TA) provides \$20 million to organizations that are experienced and successful in providing program, technical, planning, financial, and organizational capacity building assistance, or consulting in such areas as community development, affordable housing, organizational management, financing and underwriting, construction and rehabilitation management, land banking, project management and strategic planning. NSP3-TA follows these key objectives: (1) improve grantees' ability to assess conditions in the affordable segment of their local housing market consistent with the jurisdiction's Consolidated Plan and Analysis of Impediments; (2) improve grantees' ability to design and appropriately implement neighborhood stabilization programs based upon an accurate assessment of the affordable segment of their local housing market; (3) increase organizational capacity to leverage private and public dollars; and (4) improve grantees understanding of and compliance with statutory and regulatory requirements. Teams of providers with a broad range of complementary skills and expertise, working collaboratively, were selected through a competitive process.

d. Rural Capacity Building and Section 4 programs

Through the funding of national organizations with expertise in rural housing and community development, the Rural Capacity Building (RCB) Program enhances the capacity and ability of local governments, Indian tribes, housing development organizations, rural Community Development Corporations (CDCs), and rural Community Housing Development Organizations (CHDOs), to carry out community development and affordable housing activities that benefit low- and moderate-income families and persons in rural areas.

Funds may be used under the RCB program to provide capacity building support across the following three eligible activity categories:

- Training, education, support, and advice to enhance the technical and administrative capabilities of rural housing development organizations, CDCs, CHDOs, local governments, and Indian tribes, including the capacity to participate in consolidated planning, as well as in fair housing planning and Continuum of Care homeless assistance efforts that help ensure community-wide participation in assessing area needs; consulting broadly within the community; cooperatively planning for the use of available resources in a

¹ NSP2 and NSPTA are subject to an information request under OMB Control Number 2506-0185.

comprehensive and holistic manner; and assisting in evaluating performance under these community efforts and in linking plans with neighboring communities in order to foster regional planning;

- Loans, pass-through grants, predevelopment assistance, or other financial assistance to rural housing organizations, CDCs, CHDOs, local governments, and Indian tribes to carry-out community development and affordable housing activities that benefit low-income or low- and moderate-income families and persons, including the acquisition, construction, or rehabilitation of housing for low-income or low- and moderate-income families and persons, and community and economic development activities that create jobs for low-income persons; and;
- Such other activities as may be determined by the grantees in consultation with the Secretary or his or her designee.

The original authorizing statute for the RCB program is the Consolidated and Further Continuing Appropriations Act, 2012, Pub. L. 112-55. The statute link is <http://uscode.house.gov/statutes/pl/112/55.pdf>.

Section 4: The Capacity Building for Affordable Housing and Community Development Program, also known as the Section 4 program, was originally authorized under Section 4 of the HUD Demonstration Act of 1993 (Pub. L. 103-120, 107 Stat. 1148, 42 U.S.C. 9816 note), as amended. The program enhances the capacity and ability of community development corporations (CDCs) and community housing development organizations (CHDOs) to carry out community development and affordable housing activities that benefit low-income persons. The Section 4 program allows for the same three eligible activity categories detailed above for the RCB program.

The authorizing legislation and amendments list five eligible grantees: The National Community Development Initiative (now called Living Cities), Local Initiatives Support Corporation (LISC), The Enterprise Foundation (now called Enterprise Community Partners), Habitat for Humanity International (HFHI) and YouthBuild USA. In recent appropriation acts, Congress has limited eligible applicants to LISC, HFHI and Enterprise Community Partners.

The original authorizing statute for the Section 4 program is HUD Demonstration Act of 1993, Section 4, Public Law 103-120, 107 Stat. 1148, 42 U.S.C 9816 note. The statute link is <http://uscode.house.gov/statutes/pl/103/120.pdf>.

e. Recovery Housing Program

The Recovery Housing Program (RHP) was authorized under Section 8071 of the Support for Patients and Communities (SUPPORT) Act. HUD published its formula in the *Federal Register* on April 17, 2019 (84 FR 16027), identifying the 25 eligible grantees and allocation percentages. Section 8071 of the SUPPORT Act (Section 8071) required funds appropriated or made available for the RHP be treated as CDBG funds under title I of the Housing and Community Development Act of 1974, unless otherwise provided in Section 8071 or modified by waivers and alternative requirements.

Section 8071, entitled Pilot Program help Individuals in Recovery from a Substance Use Disorder Become Stably Housed, authorizes assistance to grantees (states and the District of Columbia) to provide stable, temporary housing to individuals in recovery from a substance use disorder. The assistance is limited, per individual, to a period of not more than 2 years or until the individual secures permanent housing, whichever is earlier. The funds for fiscal year 2020 allocations were made available by the Further Consolidated Appropriations Act, 2020, which was enacted on December 20, 2019. RHP is intended to support individuals in recovery onto a path to self-sufficiency. By providing stable housing to support recovery, RHP aims to support efforts for independent living. More specifically, RHP would provide the funds to develop housing or maintain housing for individuals. To maximize and leverage these resources, HUD has encouraged grantees to coordinate RHP-funded projects with other Federal and non-federal assistance related to substance abuse, homelessness and at-risk of homelessness, employment, and other wraparound services.

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.

a. CDBG-DR, CDBG-MIT, and CDBG-NDR

Grantees (cities, counties, and states that have received program grants) describe their program needs, develop action plans, drawdown funds, report performance, and submit the information to their assigned HUD office for formal review. Grantees may use the system to submit key information on funded activities such as responsible organization, beneficiary data, and grantee oversight. HUD reviews these items, approves or rejects them, and writes comments on its decisions. HUD can work with the data to produce required reports to Congress. HUD uses this data for program management purposes such as risk analysis, remote monitoring, and to respond to inquiries.

b. Neighborhood Stabilization Program

The respondents are formula grantees (states and units of local governments) under NSP1 and NSP3 and competitively selected grantees under NSP2 and NSP-TA. To comply with regulations, NSP1 and NSP3 grantees must submit substantial amendments to their annual action plans or abbreviated plans to receive NSP funds. Substantial amendments will be reviewed by HUD for compliance with requirements set forth in the combined NSP formula notice.

HUD requires all NSP grantees to collect information on the activities undertaken with NSP funds. HUD collects this information from recipients through DRGR. HUD Headquarters will use the information collected through DRGR to track compliance with NSP's statutory commitment and expenditure requirements and to generate the OMB prescribed quarterly reports. Program management reports are generated by DRGR to provide data on the status of each NSP recipients' commitment and disbursement of NSP funds. For NSP2, HUD will use this data to compile quarterly and annual reports to be posted on www.recovery.gov and www.hud.gov/recovery/. HUD uses DRGR data for program management purposes such as risk analysis, remote monitoring, and to respond to inquiries.

a. Neighborhood Stabilization 3 - Technical Assistance

NSP3-TA awardees are competitively selected. Non-recurring pre-award information collections include applications and accompanying material. Post-award documentation includes the sub-grant award and executive compensation information as required by the Federal Funding Accountability and Transparency Act of 2006 (Public Law 109-282), and grant agreements. NSP TA awardees are required to report to the Government Technical Representatives no less than quarterly unless otherwise specified in the cooperative

agreement. As part of this required report to HUD, award recipients will update DRGR with actual outputs and data related to outcomes achieved, and a narrative explanation of any disparity between projected and actual results. HUD will use the information collected through DRGR to track compliance by the technical assistance providers with NSP TA's statutory commitment and expenditure requirements, and with the goals of technical assistance stated in the NSP TA Notice of Funding Availability [Docket No. FR-5499-N-01].

d. Rural Capacity Building and Section 4 programs

Grantees (national housing and community development non-profits) describe the capacity building needs of proposed beneficiaries, develop action plans, drawdown funds, report performance, and submit the information to their assigned HUD office for formal review. Grantees may use the system to submit key information on funded activities such as responsible organization, beneficiary data, and grantee oversight. HUD reviews these items, approves or rejects them, and writes comments on its decisions. HUD uses this data to produce required reports to Congress. HUD uses this data for program management purposes, such as risk analysis, monitoring, marketing materials and responses to inquiries.

e. Recovery Housing Program

HUD will use grantee reports to oversee compliance with RHP grant requirements and perform risk analysis that may inform HUD's monitoring plans using the online DRGR system. HUD requires each grantee to annually review and report on the use of RHP funds using the online DRGR system. The annual performance report will include a financial report(s). Each grantee will enter information into DRGR on its obligations and expenditures, available cash, program income, and other financial information for the use of RHP funds as required by HUD.

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.

Yes, the information or all funds cover by this collection is submitted electronically via HUD's Disaster Recovery Grant Reporting System (DRGR).

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.

No, the 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.

While some small communities have received CDBG disaster recovery grants, the economic impact of this information collection effort should be small. Currently, the active CDBG DR, CDBG-MIT and NSP grantee users are mostly State, local, or tribal governments. Some non-profit NSP2 grantees and approximately 10 NSP technical assistance providers also use DRGR for reporting and draw down of funds. All RHP grantees are state governments or the District of Columbia. The RCB program enhances the capacity and ability of local governments, Indian tribes, housing development organizations, rural community development corporations (CDCs), and rural community housing development organizations (CHDOs), to carry out community development and affordable housing activities. The Section 4 Program also provides capacity building assistance to CDCs and CHDOs.

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.

- For CDBG-DR, CDBG-MIT, CDBG-NDR and NSP2, HUD requires grantees to report as frequently as Congress requires HUD to report to Congress (House and Senate Appropriations Committees). HUD therefore requires grantees to report quarterly.
- For NSP1 and NSP3, HUD considered configuring DRGR for less frequent reporting, but concluded that the risks of not maintaining up-to-date program information were too high regarding program performance and possible fund recapture.
- For RHP, the annual reporting requirement is consistent with the formula CDBG programs and is necessary to ensure program compliance and monitor program outcomes.
- For RCB and Section 4, grantees are to submit semi-annual reports.

When a progress report is not submitted on time, DRGR creates a flag. This flag notifies the grant manager of the issue and should prompt an inquiry on why the QPR is late. Submitting a late QPR is a factor in the annual risk assessment process. A late QPR can raise the score of the annual risk assessment could trigger an increase in monitoring and TA. If a grantee misses numerous QPRs, HUD My issue a Finding.

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; 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

There are no special circumstances that require: responses more than quarterly; response in fewer than 30 days; more than an original and two copies of any document; retain records for more than three years; statistical surveys not designed to produce results that can be generalized to the universe of study; statistical data classification not been approved by OMB; a pledge of confidentiality that is not supported by 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 respondents to submit proprietary trade secret, or other confidential information.

8. If applicable, provide a copy and identify the date and page number of publications 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.

Post in Federal Register on November 22, 2022, page 71351, vol 87. No comments were received.

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

No payment or gift is provided to respondents.

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

This issue does not pertain to the data stored in DRGR. However, access to the system is restricted to ensure that only authorized users are entering information into the system. Grantee users are only allowed to work with their own grant's data. A local grantee system administrator has control over who from the local staff can work on the grantee's data. Except for limited "super users" from HUD, staff cannot change

local data. There are 14 ‘super users’ in DRGR, 9 located at HUD HQ and 5 located in field offices. They can only view it and submit comments on it. As a security requirement, the system records user logins and can track certain changes by the user who made them. This information is not accessible by regular DRGR users or the public.

Upon login to DRGR users see a Privacy Act statement that outlines the routine use of data in the system. DRGR has a Privacy Impact Assessment (PIA) to document and assure privacy controls. This document is approved by HUD’s Privacy Office and is reviewed and approved annually. DRGR has an Authority to Operate (ATO) which means that it undergoes continuous review and assurance of NIST security and privacy controls.

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.

There are no questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private.

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.

. *CDBG-DR, CDBG-MIT and CDBG-NDR*

The DRGR system has 199 open CDBG-DR, CDBG-MIT and CDBG-NDR grants in DRGR, including the 33 grants generated by allocations under the supplemental appropriation covered by this update and all remaining open grants from prior supplemental appropriations (see Section A.1.a). The summary information and table below include both one-time only and recurring submission reporting burden calculations.

The calculation of cost burden for CDBG-DR, CDBG-MIT and CDBG-NDR grantees takes into account the size of the grantee based on amount of funds received. Grantees have been divided between average-sized (less than \$100M) and large (over \$100M).

HUD requires each grantee to report their performances to the system quarterly. Some grantees have more than one open grant under multiple appropriations, but HUD only requires grantees to report quarterly on each DRGR Action Plan in the system.

Submissions include drawdown vouchers and QPRs. There may be several line items included in each voucher and several activities reported on within a QPR. The performance report also includes submission of the SF-425 report and contract reporting. Vouchers from large grantees normally tend to include significantly more line items and require much greater time to process than average grantees.

Submissions during the pre- and post-award periods only take place once. Submissions during the quarterly reporting period continue through the life of the grant. The figures below represent submissions that will occur during the time period associated with this collection based on averages derived from FY18. A copy of the estimation calculation worksheet is attached.

Cost figures are estimated based on local staff earning the equivalent of a GS-11, Step 5, hourly rate of \$32.32.

One-time only submissions:

The one-time only pre- and post-award submissions for the 33 grants generated by allocations under the supplemental appropriation covered by this update include the Public Action Plan, standard forms, DRGR Action Plan, and required financial control documentation. Total hours are estimated at 4,257 at a cost of \$137,586.24.

Recurring submissions:

Recurring submissions include Action Plan amendments, quarterly performance reports and voucher submissions. For average-sized grants, the Department estimates 13 minutes needed per voucher. Grantees process approximately 16 vouchers per year. This requires a record keeping and reporting burden of approximately 13 hours per grantee, per year. Larger grantees take approximately 22 minutes for each voucher and submit an average of 202 vouchers per year. Therefore, all CDBG-DR, CDBG-MIT and CDBG-NDR grantees collectively spend an estimated 7,324 hours submitting vouchers in the DRGR system for a total estimated annual voucher submission cost of \$238,177.

Average-sized grantees spend an estimated 9 hours on each performance report (submitted quarterly), for a total of 3,816 hours. Large grantees spend an estimated 57 hours per performance report for a total of 21,204 hours. Therefore, all grantees collectively spend 25,020 hours per year submitting performance reports in DRGR. Total annual performance submissions cost an estimated \$813,650.40.

Additionally, grantees are required to amend the Action Plan if there are changes to the types of programs offered with CDBG-DR funds or if there are significant changes to the programs themselves. The *Federal Register* notices define what is considered a significant change. The Department estimates that grantees would amend the Action Plan at least twice per year, which also triggers an update to the Performance and Financial Projections. Based on this estimation, grantees collectively spend an estimated 5,970 hours amending the Action Plan annually. The total annual cost associated with amending the Action Plan is estimated at \$192,950.40.

CDBG-DR, CDBG-MIT, and CDBG-NDR								
	Description of Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Non-recurring	PRE-AWARD							
	SUBMISSION REQUIREMENTS							
	Published Action Plan	33	1	33	40	1,320	\$32.32	\$42,662.40
	SF 424	0	0	0	0	0	0	0
	Procurement Financial Controls and DOB Checklist (HUD 721 & 722)	33	1	33	60	1,980	\$32.32	\$63,993.60
	Performance and Financial Projections	33	1	33	8	264	\$32.32	\$8,532.48
	POST-AWARD							
	Grant Agreement	33	1	33	1	33	\$32.32	\$1,066.56
	DRGR Activation, Activity Set-Up and Completion	33	1	33	20	660	\$32.32	\$21,331.20
	Description of Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
	REPORTING (Annual)							
Recurring	Average Sized Grants Online Quarterly Reporting via DRGR	106	4	424	9	3,816	\$32.32	\$123,333.12
	Large Grants Online Quarterly Reporting via DRGR	93	4	372	57	21,204	\$32.32	\$685,216.32
	Average-sized grants online voucher submissions	106	16	1,696	0.22	373.12	\$32.32	\$12,059.24
	Large-sized grants online voucher submission	93	202	18,786	0.37	6,950.82	\$32.32	\$224,650.50
	Action Plan Amendments (includes updated Projections)	199	2	398	15	5,970	\$32.32	\$192,950.40

	TOTAL PAPERWORK BURDEN	762	Varies	21,841	Varies	42,570.94	\$32.32	1,375,892.78
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• *b. Neighborhood Stabilization Program*

- There are currently 235 open NSP grants and 37 open NSP2 grants in DRGR. The following table demonstrates the estimated paperwork burden for recurring submissions.
- HUD requires each grantee to report their performances to the system quarterly. Some grantees have more than one open grant under different appropriation rules. Such a grantee must make one submission per grant per quarter.
- Submissions include drawdown vouchers and performance reports. There may be several line items included in each voucher and several activities reported on within a performance report. Vouchers from large grantees normally tend to include significantly more line items and require much greater time to process than average grantees,
- Submissions during the pre-award and post-award periods only take place once. Submissions during the quarterly reporting period continue through the life of the grant.
- Cost figures for NSPI & III are estimated based on local staff earning the equivalent of a GS-11, step 1, hourly rate. Cost figures for NSP 2 are based on local staff earning the equivalent of a GS-13, Step 1, base hourly rate.

Recurring submissions:

For the 235 open NSP, 42 open NSP2 grants, and 204 NSP3 grants in the DRGR system, the Department estimates 11 minutes per voucher submission. NSP grantees process approximately 38 vouchers per year. This requires a record keeping and reporting burden of approximately 3,526.52 hours for an annual voucher submission cost of \$106,929.56.

NSP grantees spend an estimated four hours per QPR submission, for a total of 8,560 hours for a total annual QPR submission cost of \$244,131.20.

Neighborhood Stabilization Program I & III								
	Description of Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
	REPORTING (Annual)							
Recurring	Online Quarterly Reporting via DRGR	439	4	1,756	4	7,024	\$28.52	\$200,324.48
	DRGR voucher submissions	439	38	16,682	0.18	3,002.76	\$28.52	\$85,638.72
	TOTAL PAPERWORK BURDEN	877	Varies	18,438	Varies	10,026.76	\$28.52	\$285,963.20

Neighborhood Stabilization Program 2 (Year 1)							
Description of Information Collection	Number of Respondents	Number of Responses	Total Number of Responses	Hours Per Response	Total Hours	Cost Per Response	Total Cost*
Online Quarterly Reporting via DRGR	42.00	4.00	168.00	4.00	672.00	\$40.65	\$27,316.8
DRGR voucher submissions	42.00	38.00	1,596.00	0.18	287.28	\$40.65	\$11,677.93
Annual Reporting via DRGR	14.00	1.00	14.00	3.00	42.00	\$40.65	\$1,707.30
Annual Income Certification Reporting	14.00	1.00	14.00	3.00	42.00	\$40.65	\$1,707.30
TOTAL PAPERWORK BURDEN	112.00	Varies	1,792	Varies	1,043.28	\$40.65	\$42,409.33
(Year 2)							
Online Quarterly Reporting via DRGR	32.00	4.00	128.00	4.00	512.00	\$40.65	\$20,812.80
Quarterly Voucher Submissions	32.00	38.00	1,216.00	0.18	218.88	\$40.65	\$8,897.47
Annual Reporting via DRGR	24.00	1.00	24.00	3.00	72.00	\$40.65	\$2,926.80
Annual Income Certification Reporting	24.00	1.00	24.00	3.00	72.00	\$40.65	\$2,926.80
TOTAL PAPERWORK BURDEN	112.00	Varies	1,392	Varies	874.88	\$40.65	\$35,563.87
(Year 3)							
Online Quarterly Reporting via DRGR	22.00	4.00	88.00	4.00	352.00	\$40.65	\$14,308.8
Annual Reporting via DRGR	34.00	1.00	34.00	4.00	136.00	\$40.65	\$5,528.40
Quarterly Voucher Submissions	22.00	4.00	88.00	0.20	17.60	\$40.65	\$715.44
Annual Income Certification Reporting	34.00	1.00	34.00	3.00	102.00	\$40.65	\$4,146.30
TOTAL PAPERWORK	112.00	Varies	244.00	Varies	607.60	\$40.65	\$24,698.94

BURDEN							
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c. *NSP3 Technical Assistance Grants*

There are currently 31 open NSP3-TA grant in DRGR. The following table demonstrates the estimated paperwork burden for recurring submissions.

Submissions include work plans and drawdown vouchers. Each TA providers enters approximately five TA work plans per year and 38 drawdown vouchers per year.

Cost figures are estimated based on local staff earning the equivalent of a GS-11, step 1, hourly rate.

For the 31 NSP3-TA average-sized grants, the Department estimates TA providers enter five work plans per year at eight hours per TA work plan for a total of 1,240 hours over the course of a year. Total annual QPR submission costs approximately \$35,364.80.

For the 31 NSP3-TA average-sized grants, the Department estimates 11 minutes per voucher. Grantees process approximately 38 vouchers per year. Total burden hours for all grantees over the course of the year is 212.04, for a total annual submission cost of \$6,047,38.

Neighborhood Stabilization Program 3 - Technical Assistance								
	Description of Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
	REPORTING (Annual)							
Recurring	Online quarterly reporting via DRGR	31	5	155	8	1,240	\$28.52	\$35,364.80
	DRGR voucher submissions	31	38	1,178	0.18	212.04	\$28.52	\$6,047.38
	TOTAL PAPERWORK BURDEN	62	Varies	1,333	Various	1,452.04	\$28.52	\$41,412.18

d. *Rural Capacity Building and Section 4 programs*

- The system has 40 open grants in DRGR including all projected grants to be awarded through the FY2019 & 20 RCB and Section 4 NOFAs.
- HUD requires each RCB and Section 4 grantee to report their performances in the system semi-annually for each grant award.

- Submissions include drawdown vouchers and semi-annual performance reports. There may be multiple line items included in each voucher and several activities reported on within a performance report. Drawdown vouchers are usually submitted on a monthly basis.
- Since these grantees are National Non-Profits and often staffed by mid-career individuals, the cost figures are estimated based on local staff earning the equivalent of a GS-13, Step 1, base hourly rate.

One-time only submissions:

The one-time non-recurring submissions include DRGR activation and account setup, plus creation of the original Action Plan. Total hours are estimated at 70 at a cost of \$2,845.50.

Recurring submissions:

Grantees have shown a need to revise their Action Plans to provide implementation updates prior to semi-annual report submission. The Department estimates that each Action Plan revision will take 30 minutes and will occur two times a year. Grantees are estimated to spend 40 hours per year on Action Plan revisions. The Total costs for all grantees for Action Plan revisions is \$1,626.

Recurring submissions include semi-annual progress reports and voucher submissions. For grantees, the Department estimates 15 minutes needed per voucher with grantees processing approximately 12 vouchers per year. This requires a record keeping and reporting burden of approximately three hours per grantee, per year. Therefore, all grantees collectively spend an estimated 120 hours submitting vouchers in the DRGR system for a total estimated annual voucher submission cost of \$4,878.

Grantees spend an estimated eight hours on each semi-annual report, for a total of 640 hours. Total annual semi-annual report submissions cost an estimated \$26,016.

The following table summarizes the total burden hours required across programs and estimated costs related to this collection.

Rural Capacity and Section 4

	Description of Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Non-recurring	DRGR Activation & Account Setup	5	1	5	2	10	\$40.65	\$406.50
	Action Plan Setup & Submission	5	1	5	12	60	\$40.65	\$2,439
Recurring	Action Plan Revisions	40	2	80	0.5	40	\$40.65	\$1,626
	Semi-Annual Report Submissions	40	2	80	8	640	\$40.65	\$26,016
	Voucher Submission	40	12	480	0.25	120	\$40.65	\$4,878
Total Paperwork		130	Varies	650	Varies	870	\$40.65	\$35,365.50

Rural Capacity and Section 4

Burden								

e. Recovery Housing Program

The DRGR system has 25 new RHP grants. The summary information and table below include both one-time only and recurring submission reporting burden calculations. Submissions during the pre- and post-award periods only take place once. Other submissions continue through the life of the grant. The figures below represent submissions that will occur during the time period associated with this collection based on estimated averages. Cost figures are estimated based on local staff earning the equivalent of a GS-12, Step 9, hourly rate.

One-time only submissions:

The one-time only pre- and post-award submissions for the 28 grants include the published Action Plan, standard forms, and DRGR Action Plan. Total hours are estimated at 1,708 at a cost of \$73,956.40.

Recurring submissions:

Recurring submissions include Action Plan amendments, annual performance reports, and voucher submissions. The Department estimates 13 minutes needed per voucher and that grantees will process approximately 12 vouchers per year. This requires a record keeping and reporting burden of approximately 2.64 hours per grantee, per year. Collectively, all RHP grantees collectively will spend an estimated 66 hours submitting vouchers in the DRGR system for a total estimated annual voucher submission cost of \$2,866.38.

Grantees spend an estimated 9 hours on each annual performance report, for a total of 225 hours. Total estimated submissions cost an estimated \$9,742.50.

Additionally, grantees are required to amend the Action Plan if there are changes to the types of programs offered with RHP funds or if there are significant changes to the programs according to each grantee’s citizen participation plan. The Department estimates that only 10 grantees would amend the Action Plan per year. Based on this estimation, grantees collectively spend an estimated 150 hours amending the Action Plan annually for a total annual cost estimated at \$6,495.

RHP								
	Description of Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Non-recurring	PRE-AWARD							
	SUBMISSION REQUIREMENTS							
	Published Action Plan	28	1	28	40	1,120	\$43.30	\$48,496

	SF 424	0	0	0	0	0	0	0
	POST-AWARD							
	Grant Agreement	28	1	28	1	28	\$43.30	\$1,212.4
	DRGR Activation, Activity Set-Up and Completion	28	1	28	20	560	\$43.30	\$24,248
	Description of Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
	REPORTING (Annual)							
Recurring	Online Annual Reporting via DRGR	28	1	28	9	252	\$43.30	\$10,911.60
	Online voucher submissions	28	12	336	0.22	74	\$43.30	\$3,204.2
	Action Plan Amendments (includes updated Projections)	10	1	10	15	150	\$43.30	\$6,495
	TOTAL PAPERWORK BURDEN	150	Varies	458	Varies	2,184	\$43.30	\$94,567.20

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.
 - 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.

- 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.

DRGR does not have any 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.

a. CDBG-DR, CDBG-MIT, CDBG-NDR, NSP, NSP3-TA, and RHP

The total cost to the government for working with the data is estimated to total \$1,900,407.50. System development and maintenance costs are not included in these estimates.

b. Rural Capacity Building and Section 4 programs. The total cost to the government for working with the data is estimated to total approximately \$35,465.50. System development and maintenance costs are not included in these estimates.

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-DR/ MIT/NDR	762	Varies	21,841	Varies	42,570.94	\$32.32	\$1,375,892.78
NSP I & III	877	Varies	18,438	Varies	10,026.76	\$28.52	\$285,963.20
NSP II	336	Varies	3,428	Varies	2,525.76	\$40.65	\$102,672.14
NSP III	62	Varies	1,333	Varies	1,452.04	\$28.52	\$41,412.18
RC/Section 4	130	Varies	650	Varies	870	\$40.65	\$35,365.50
RHP	150	Varies	458	Varies	2,184	\$43.30	\$94,567.20
Totals	2,317	Varies	46,148	Varies	59,629.50	Varies	\$1,935,873.00

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

- 33 new CDBG-DR grants have been added to the system since the last PRA submission.
- No new NSP grants have been added to the system since the last PRA submission.
- No new NSP-3 TA grants have been added to the system since the last PRA submission.
- 5 new Rural Capacity Building and Section 4 grants have been added to the system since the last PRA submission.
- 25 new RHP grants have been added to the system.
- NSP2 PRA data has been moved to this PRA due to that program's reporting requirements in DRGR.

The DRGR system is updated regularly (at least once per year). A description of DRGR updates is located here: <https://www.hudexchange.info/programs/drgr/>. Reporting requirements are expected to be substantively the same.

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.

Each quarter HUD prepares reports from the data system that highlights the uses of funds and accomplishments of grantees. A synthesis of these reports is presented to 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.

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

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

This includes, specifically, providing the required information to respondents.