Supporting Statement for Paperwork Reduction Act Submissions HUD Standardized Grant Application Form HUD 27061 (OMB # 2535-0113)

A. Justification

- 1. Title VI of the Civil Rights Act of 1964 requires the collection of information concerning the race and ethnicity of the populations intended to benefit from HUD funding.
- 2. This is a reinstatement with change of a currently approved collection. The information collection is required to ensure HUD's compliance with Title VI of the Civil Rights Act of 1964. HUD's method for electronic collection of form HUD 27061 standardizes the format for information collection requirements for applicants for HUD funding. To ensure that all programs comply with Title VI of the Civil Rights Act of 1964, the form is submitted as an attachment to applications for HUD funding.
- 3. The information collected through grant applications is submitted electronically. This form is downloaded from Grants.gov and www.hud.gov, in both Microsoft Word and PDF formats.
- 4. The form uniformly collects information across applicants and funding years. The collection is not duplicative.
- 5. This collection does not have a significant economic impact on small businesses or entities.
- 6. If form content was reduced, HUD staff's ability to comply with Title VI of the Civil Rights Act of 1964 could be impaired. The information reported on the form is part of the accountability mandated by Title VI of the Civil Rights Act of 1964, with respect to HUD assistance made available and awarded.
- 7. There are no special circumstances required in the collection of the information. The following circumstances do not apply to this 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-inaid, 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. This information is collected in a manner consistent with guidelines of 5 CFR 1320.8(d). The Notice Announcing the collection of information appeared in the Federal Register on Tuesday, September 27, 2022, at 87 FR 58524. Three comments were received; however, none caused a change in the form.
- 9. No payments or gifts are provided to respondents.

- 10. There is no assurance of confidentiality provided to the respondents; however, respondents are covered by the Privacy Act of 1974. The information requested under this collection is protected and held private in accordance with 5 U.S.C. 552 (Freedom of Information Act), and (Privacy Act of 1974).
- 11. The collection does not contain information of a sensitive nature about sexual behavior or attitudes, religious beliefs, or private matters.
- 12. Estimated burden, see Table 1:

Table 1: Estimated Burden for Respondents

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost				
HUD-27061	14,375	1.2	17,250	0.50	8,625.00	\$45.43*	\$391,833.75				
* Median hourly rate for "Project Management Specialists" (occupation code 13-1082), May 2021 National Occupational Employment and Wage Estimates United States, <u>https://www.bls.gov/oes/current/oes_nat.htm#11-0000</u> .											

The estimated total of all grant applications in all the Department's current grant programs is approximately 14,375, including initial and updated applications. The actual burden is assessed against each HUD program submission.

- 13. There are no additional costs associated with the collection of this information.
- 14. The actual costs to the Federal government is assessed on each HUD program submission. However, HUD estimates the cost of the maximum burden on HUD staff would total at most \$1,452,450.00. This estimate assumes the form would be reviewed for one hour by a GS-13 step 5, and then by a GS-14 and a GS-15 who will look at summary results on an annual basis.

Table 2: Estimated HUD Burden

Informat n	io Number of Respondent	Frequency of Response	Responses Per Annum	Hourly Cos		Annual Cost		
Collectio	-			GS 13: 1 hour	GS 14: 15 mins.	GS 15: 15 mins.	Blende d	
HUD-270	061 14,375	1.2	17,250	\$51.25	\$15.14	\$17.81	\$84.20	\$1,452,450.0 0

* Using <u>OPM's "Rest of the United States" hourly rates for 2022</u>, Federal staff time is estimated for a GS-13 step 5 at \$51.25 per hour, as well as 15 minutes each for a GS-14 step 5 at \$60.56/hr. and a GS-15 step 5 at \$71.24/hr., bringing the blended total to \$84.20/hr for each form submitted.

- 15. This is a reinstatement with change of a currently approved collection. The field labeled DUNS Number is relabeled as Grantee/Recipient UEI. The PRA statement was also updated for compliance.
- 16. The information may be made available publicly depending on requests from OMB, Congress, or Federal agencies with appropriate authority. Also, individual HUD programs may assess needs to publish information.
- 17. The information collection instruments will display the expiration date for OMB approval of the information collection.

- 18. There are no exceptions to the certification statement identified in item 19 of the OMB 83-I.
- B. Collections of Information Employing Statistical Methods

There are no statistical methods used in this collection.