

**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. 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.

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. 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.

This is a reinstatement with change of a currently approved collection. 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. 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.

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. 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.

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. If the collection of information impacts small businesses or other small entities describe any methods used to minimize burden.

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. 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.

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:

- 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. If applicable, provide a copy and identify the date and page number of publication 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.

A notice requesting public comments for 60 days was published in the Federal Register on May 1, 2023, Volume 88, Number 83, Page 26587 (FR-7065-N-01). No comments were received.

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

No payment or gift is provided to respondents by completing the HUD-27054E form alone.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

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. 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.

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. 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 chart below; 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.

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 Response | Annual Burden Hours | Hourly Cost Per Response | Annual Cost |
|------------------------|-----------------------|-----------------------|---------------------|--------------------------|---------------------|--------------------------|--------------------|
| HUD-27054E | 2,420.00 | 1.00 | 2,420.00 | 0.17 | 411.40 | \$25.27 | \$10,396.08 |
| Total | | | | | 411.40 | \$25.27 | \$10,396.08 |

The annual burden is calculated at the average hourly rate of a nonprofit Executive Director position who would complete the form. This data is taken from [payscale.com](https://www.payscale.com/research/US/Job=Executive_Director/Salary) at https://www.payscale.com/research/US/Job=Executive_Director/Salary, which as of June 12, 2023 shows an hourly rate of \$25.27.

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 already reflected on the burden worksheet 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.

There are no additional cost 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.

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 Respondents | Frequency of Response | Responses Per Annum | Burden Hour Per Response | Annual Burden Hours | Hourly Cost Per Response | Annual Cost |
|------------------------|-----------------------|-----------------------|---------------------|--------------------------|---------------------|--------------------------|-------------|
| HUD-27054E | 2,420.00 | 1.00 | 2,420.00 | 0.17 | 411.40 | \$69.77 | \$28,703.38 |
| Total | | | | 0.17 | 411.40 | \$69.77 | \$28,703.38 |

2420 responses x .17 burden hour per response x \$69.77 p/hr (GS-13 Step 10, Washington DC Locality as of June 12, 2023) = \$28,703.38

15. Explain the reasons for any program changes or adjustments reported in Items 12 and 14 of the Supporting Statement.

This is a reinstatement with change of a currently approved collection. The only modifications made to form HUD-27054E is formatting.

- Shifted/resized text and other fields in all Blocks on page 1 for consistency and better alignment with rest of the form.

- Removed “(TYPED)” text in Blocks 3 and 6 since instructions mentioning that all fields must be typed in is included in the 1st paragraph on page 1 in red text, and it was mentioned during the meeting that some users still print out and fill out the form offline.
- Added shortcut links in blue text for all Blocks on pages 1 and 2 so users can quickly access the corresponding instructions for each Block.
- Added multiple “Back to Top” buttons on pages 3 and 4 so users can quickly go back to filling out the access form from the instructions pages.
- Added a text field on page 2 above Block 9 that will auto-populate with the number of authorization pages used in Block 4 of page 1.
- Added checkboxes to Blocks 9 and 10 on page 2 that will auto-populate with the type of function as checked in Block 1 of page 1 along with the corresponding function labels.
- Added a new column (Add or Remove) along with drop-down menus to Blocks 9 and 10 on page 2 where users will be able to select add or remove as an option for the program area and tax-ID.
- Shifted/modified text, lines, and other fields in Blocks 9 and 10 on page 2 for consistency and better alignment with rest of the form.
- Added placeholder text for the links to the LOCCS program areas in the first rows of Blocks 9 and 10 on page 2.
- Removed extra space and shifted Block 10 up. Made Blocks 11 a-c larger.
- Capitalized the “e” in all references of “27054E” for consistency.
- Updated all dates.
- Changed some instructions on page 1 to red text to emphasize importance.
- Removed reference to digital signature/DocuSign from block 9 on page 1 for the HUD Program Office POC Signature section.
- Updated text on page 2 to reflect updated instructions regarding what constitutes an approving official.
- Updated Privacy Act and Public Burden statements on page 2 to reflect new language.

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.

Results will not be published.

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.

No exceptions are requested.

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

No exceptions.

B. Collections of Information Employing Statistical Methods

N/A