

Paperwork Reduction Act Change Worksheet

Agency/Subagency: U.S. Department of Housing and Urban Development	OMB Control Number: 2511-0002
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Enter only items that change	Current Record	New Record**
Agency form number(s): N/A	N/A	N/A
Annual reporting and keeping hour burden		
Number of respondents	5000-6500	5000-6500
Total annual responses	<5000	<5000
Percent of these responses collected electronically	90-100 %	90-100 %
Total annual hours	2500-5000 Hrs	2500-5000 Hrs
Difference	NA	NA
Explanation of difference Program change Adjustment	NA	NA NA
Annual reporting and recordkeeping cost burden (in thousands of dollars)		
Total annualized Capital/Startup costs	NA	NA
Total annual costs (O&M)	77,800 - 155,600	77,800 - 155,600
Total annualized cost requested	NA	NA
Difference	NA	NA
Explanation of difference Program change Adjustment	NA	NA NA

Other change: **

To enhance the transparency and accountability of the HUD BABA waiver application process, we have implemented several key changes to the form. Specifically, we have revised or removed several questions and updated language to streamline HUD's information gathering from respondents.

Modification to Question 4: The original question referred to the Federal Financial Assistance Identification Number. Two sub-questions have been added to this question:

- 4.1 Provide the SAM.gov Assistance Listing number.
- 4.2 Provide the SAM.gov Assistance Listing name.

Removal of Question 7: The original question inquired about Federal Financial Assistance Agreement start and end dates. This question has been removed.

Modification to Question 8: The original question inquired about whether other agencies are providing funding for the project, and has been expanded to gather more detailed information:

- **New Sub-Question for "Yes" Responses:** If the respondent indicates that HUD is the largest provider of funding, a new sub-question has been added to identify other agencies involved in funding the project.
- **New Sub-Question for "No" Responses:** If the respondent indicates that HUD is not the largest provider of funding, a new sub-question has been added to ask why they are applying for a waiver from HUD instead of applying for a waiver with the agency that has the largest funding in the project.

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** This form cannot be used to extend an expiration date.

Modification to Question 9: Change of original verbiage, “Total scale of infrastructure project, including federal and non-federal funding,” to “Total cost of infrastructure project, including federal and non-federal funding.”

Modification to Question 11: Change of original verbiage, “Is this waiver for a specific product or a category of products? Check one below,” to “Is this waiver for one or more specific products or categories of products? Check one or both below.”

Modification to Question 12: Change original verbiage, “Quantity required,” in sub-question to “Quantity required of the items and/or categories of items to be waived.”

Modification to Question 13: Change original verbiage in answer choice, “Project Level (one infrastructure project within one award, or co-funded by multiple Agencies),” to “Project Level (one infrastructure project within one award, or one infrastructure project co-funded by multiple Agencies.” Additionally, change the original verbiage in sub-question, “Describe the scope of the waiver. Specify whether the infrastructure project is co-funded by other Federal Agencies and/or if you anticipate this to be the case in the near future,” to “Describe the scope of the waiver.”

Modification to Question 14:

- **Sub-Question 14.1:** Change the original verbiage, “A description of the due diligence performed by the applicant, including names and contact information of the manufacturers, distributors, or suppliers contacted for quotes (minimum 3), and the responses provided. Attach documentation for additional support if needed,” to “A description of the due diligence performed by the applicant to determine if the iron, steel, construction materials or manufactured products were available, including names and contact information of the manufacturers, distributors, or suppliers contacted for quotes (minimum 3), and the responses provided. Attach documentation for additional support if needed.”
- **Remove Sub-Question 14.1.2.**
- **Sub-Question 14.2:** Change the original verbiage, “What is the additional cost of the BABA compliant items, compared to using iron and steel, manufactured products, and construction materials of non-domestic or unknown origin? If the additional cost is less than 25 % of the total project cost, please state, in an itemized manner, which items the Grantee is requesting to be waived. Attach documentation of prices for BABA compliant and non-compliant items for items to be included in the cost comparison Attach documentation for additional support if needed,” to “What is the additional cost of the BABA compliant items, compared to using iron and steel, manufactured products, and construction materials of non-domestic or unknown origin? Attach documentation of prices for BABA compliant and non-compliant items for items to be included in the cost comparison.”

Additionally, please note the following regarding the system of collection for BABA waivers:

The Build America, Buy America Act (the Act), enacted as part of the Infrastructure Investment and Jobs Act on November 15, 2021, established a domestic content procurement preference for all Federal financial assistance obligated for infrastructure projects after May 14, 2022. The intention of the Act is to promote domestic manufacturing and employment by requiring a percentage of iron, steel, manufactured products, and construction materials that are used in covered infrastructure projects, are produced in the United States. Infrastructure projects that cannot procure materials domestically will require a waiver submission pursuant to Section 70914(c). Link: Build America, Buy America Act Provisions.

Developed using the components of Salesforce CRM under FedRAMP approved Salesforce Government Cloud Plus platform, the Build America, Buy America Act BABA Waiver System (BABA WS) is an Information Technology (IT) system for the Department of Housing and Urban Development (HUD). The BABA WS enables Grantees receiving Federal Financial Assistance for infrastructure projects to submit waiver submissions intended for HUD officials via web-enabled electronic form(s). The functionality of receiving, processing, and storing of waivers is also implemented under this system. Compared against the handling of waiver submissions under a manual approach, the BABA WS capabilities of streamlining and automating repetitive tasks provides a higher level of efficiency, accuracy, and scalability under an IT solution.

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