

Supporting Statement for Paperwork Reduction Act Submissions
(Consolidated Housing and Community Development Strategy and Plan)
(OMB #2506-0117)

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.

Submission of the Consolidated Housing and Community Development Strategy and Plan (the Consolidated Plan, or “Con Plan”) is required every three to five years for grantees who receive one or more of the formula grant programs administered by the Department of Housing and Urban Development’s (HUD) Office of Community Planning and Development (CPD): Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grants (ESG), Housing Opportunities for Persons with AIDS (HOPWA), and the Housing Trust Fund (HTF). The requirement that grantees submit this information is in compliance with the Cranston Gonzalez National Affordable Housing Act of 1990, which requires participating jurisdictions to submit a Comprehensive Housing Affordability Strategy (Section 105(b)); the Housing and Community Development Act of 1974, as amended, which requires states and localities to submit a Community Development Plan (Section 104(b)(4) and Section 104(m)); and provisions of these Acts that require states and localities to submit applications and reports for these formula grant programs. The Consolidated Plan regulations are found at 24 CFR part 91.

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.

HUD and CPD grantees are the primary users of this information. This information is submitted electronically through the Integrated Disbursement and Information System (IDIS), CPD’s grants management information system. The purpose of the Consolidated Plan is to provide HUD with a preliminary assessment as to the statutory and regulatory eligibility of proposed grantee projects, to inform citizens of the intended uses of program funds, and to track progress against the goals. Each year grantees are also required to complete an Annual Action Plan that outlines activities to be undertaken under the Consolidated Plan. The Annual Performance Report is the report back to HUD on how the grantee is making progress toward the goals established in the Consolidated Plan and towards those identified for the past year in the Annual Action Plan.

The language below appears in the footer of every Consolidated Plan. Here is an example:

Consolidated Plan	BIRMINGHAM	1
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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.

Improved IT systems, through upgrades to IDIS, are being used to allow for electronic submission of this information. Ninety-nine percent of the reporting and record keeping requirements are accomplished online. The SF-424 and certifications required by regulations and statutes for the Consolidated Plan and each of the formula grant programs may be electronically signed and submitted via email. Grantees submit the executed SF-424 form by attaching it to the electronic submission of the Annual Action Plan.

Applicants may use previously entered information where possible to reduce completion time using the IDIS system. The grantee is able to copy over prior information and edit the document for updates. Estimates provided are based on a grantee starting a blank document (without using the copy option) to reflect the most burden hours that could be incurred.

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.

HUD has not identified other information collections that meet the individual program statutory requirements fulfilled by the Consolidated Plan submission. However, where information in the Consolidated Plan has been required by other offices within HUD, grantees are provided with that information. For example, tables in the submission template for the Consolidated Plan pre-populate with data that has been provided on public housing (by Public Housing Agencies) and homeless programs (by Continuums of Care).

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

The information required is collected from State and local governments. Therefore, it does not have any impact on small businesses or other small entities.

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 specific requirement that grantees receiving CDBG, HOME, ESG, HTF or HOPWA funds submit a Consolidated Plan every three to five years (timing is at the grantee's discretion) and an Annual Action Plan every year is regulatory. A grantee that does not submit a Consolidated Plan or Annual Action Plan will not receive funding under the covered programs. In addition, the submission of the Consolidated Plan is vital in determining the preliminary eligibility of grantee's proposed projects for each program year.

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; **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 would cause this information collection to be conducted in a manner that would impose one or more of the additional requirements identified under this item.

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.

A Federal Register Notice soliciting comments was published on March 17, 2025, vol. 90, page 12334. No comments were received.

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

There is no offer of monetary or material value to the respondents of this information collection (localities and state grantees). Grantees must submit a Consolidated Plan and Annual Action Plans to receive their annual formula funding allocations under the covered programs.

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.

HUD does not make assurances of confidentiality pertaining to this information collection.

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 contained in this information collection regarding sensitive or private subjects.

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.

OBGA conducted a thorough review of previous Paperwork Reduction Act submissions for this information collection going back to 2008 to develop this burden hour statement. The total number of burden hours is 418,300. This is split, as noted in the table below, into two separate responses for Localities and States, one for the Consolidated Plan and Annual Action Plan and another for the Annual Performance Report. Calculations are estimates of annual costs to respondents for the preparation of a complete Consolidated Plan, Annual Action Plan and Annual Performance Report. HUD provides an electronic template that provides pre-populated demographic and housing data based upon the grantee's geographic area. Because HUD provides this pre-populated data at the grantee's geographic level, additional time would not be required for a larger state/locality versus a smaller state/locality to undertake additional data collection or analysis. States are estimated to have 556 burden hours in the development of a Consolidated Plan. This is because of the additional public hearings and the method of distribution requirements associated with state grantees. Localities are estimated to have 230 burden hours in the development of a Consolidated Plan. Localities are not required to use a method of distribution process and regulatorily may hold fewer public hearings. The process to complete a plan is standardized for localities and for states based on the regulations.

A complete Consolidated Plan that contains a Strategic Plan and Annual Action Plan is submitted once every three to five years. An Annual Action Plan is submitted once a year. An Annual Performance Report is submitted once per year. A grantee responds twice per year: once at Con Plan/Annual Action Plan submission and once at Annual Performance Report submission. The total number of respondents is 1,300. This includes 1,243 local governments, 4 Insular Areas, 3 Hawaiian non-entitlement areas and 50 states (including the Commonwealth of Puerto Rico but excluding the State of Hawaii) that receive direct CDBG or HOME funding and are required to submit a complete Consolidated Plan, Annual Action Plan, and Annual Performance Report. There are 37 other local governments that receive funds under a joint agreement with an urban county local government that are not required to submit a Consolidated Plan, Annual Action Plan, or Annual Performance Report as those counties submit such on their behalf.) HUD has determined that it no longer has jurisdictions that are required to submit an abbreviated strategy. An abbreviated strategy is submitted in lieu of a complete Consolidated Plan when a jurisdiction does not receive direct CDBG or HOME funding and is not a member of a HOME Consortia.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Consolidated Plan and Annual Action Plan							
• Localities	1,250	1	1,250	230	287,500	\$48.59	\$13,969,625.00
• States	50	1	50	556	27,800	\$48.59	\$1,350,802.00
Annual Performance Report							
• Localities	1,250	1	1,250	75	93,750	\$48.59	\$4,555,312.50
• States	50	1	50	185	9,250	\$48.59	\$449,457.50
Total	1,300*				418,300	\$48.59**	\$20,325,197.00

* Total number of respondents of 1,300 = sum of localities (1,250) and states (50). Total localities of 1,250 includes 1,243 entitlements + three non-entitlements (Hawaii, Kauai, Maui) and four Insular Areas (Guam, Northern Mariana Islands, American Samoa, and the U.S. Virgin Islands)

**Estimates assume a blended hourly rate that is equivalent to a GS-12, Step 1, Federal Government Employee

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 is no additional cost to respondents or record keepers for collection of this information for the elements: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component.

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.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Consolidated Plan & Performance Reports	1,300*	2	2,600	15	39,000	\$48.59**	\$1,895,010.00

* Total responses of 2,600 = Number of Combined Consolidated Plans and Action Plans for Localities and States (1250+50) + Number of Performance Reports for Localities and States (1,250+50) + Number of abbreviated plans (0).

**Estimate assumes a blended hourly rate that is equivalent to a GS-12, Step 1, Federal Government Employee

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

Restatement with changes of a previously approved collection. OBGAs conducted a thorough review of previous Paperwork Reduction Act submissions for this information collection going back to 2008 to develop this burden hour statement. Several prior year estimates split the number of responses and the response burden associated with each type of response and it appears that the response burden may have been double-counted in years when only one response was noted per grantee annually. The calculation of 418,300 burden hours in this document changed from 413,420 hours for the following reasons: (1) the change in the number of total grantees from 1,284 to 1,300; and (2) respondents have spent additional time preparing and having documents executed electronically since and following the pandemic.

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.

The results of this information collection will not be published, nor will any complex analytical techniques be used.

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 will display the expiration date for OMB approval of this information collection.

18. Explain each exception to the certification statement.

HUD does not request an exception to the certification of this information collection.