

**Supporting Statement for Paperwork Reduction Act Submissions
Veteran Housing Rehabilitation and Modification Pilot Program
(OMB# 2506-0213)**

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 is a reinstatement of a currently approved collection. Section 1079 of the Carl Levin and Howard P. “Buck” McKeon National Defense Authorization Act for Fiscal Year 2015 (Public Law 113-291) established the Veterans Housing Rehabilitation and Modification Pilot Program (VHRMP). The purpose of the Veterans Housing Rehabilitation and Modification Pilot Program is to award grants to nonprofit organizations to rehabilitate and modify the primary residence of low-income veterans with disabilities. The funds made available under this program are awarded competitively. HUD must collect certain certifications and information from applicants and collect information of the use and outcomes of these grants to comply with both program-specific and cross-cutting grant application and reporting requirements, including requirements under Section 1079(b)(2) and (8) of the Carl Levin and Howard P. “Buck” McKeon National Defense Authorization Act for Fiscal Year 2015, cross-cutting Federal grant requirements in title 2 of the Code of the Federal Regulations, and cross-cutting requirements for HUD grants identified in 24 CFR part 5, subpart A, and the program Notice of Funding Opportunity (NOFO).

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.

The information collected is used to account for current grant recipients of the VHRMP program.. Grant recipients established and maintained records to allow HUD to determine whether or not activities are being carried out in accordance with applicable laws and requirements and to facilitate the review and audit of grant management. Post-award data such as quarterly reports (which includes such information as activity and budget information, drawdowns, performance reports, and Federal Financial Reports or FFRs) will continue to be submitted via the Disaster Recovery Grant Reporting System (DRGR). Currently, the VHRMP program operates in post-award status, which requires no pre-award forms due to no funds appropriated after FY 2023.

The instruments to be used are:

Purpose: These forms listed below are used as part of the VHRMP grants management process. This is a competitive grant.

HUD-2880	Applicant/Recipient Disclosure/Update Report	Applicant is required to complete this form in order to verify there are no conflicts of interest or violations of government policies with respect to receiving funds from the government.
HUD-27061	Race and Ethnic Data Reporting Form	Applicants requesting funding from the Department of Housing and Urban Development (HUD); and organizations who receive HUD Federal financial assistance that are required to report race and ethnic information
HUD-50153	Certification with Consistency with Promise Zone Goals and Implementation	If applicable, applicant is required to verify proposed activities are in designated Promise Zones confirmed by Authorized Official. Applicant must submit a completed and signed HUD-50153 form.
Disaster Recovery Grant Reporting (DRGR) System		The Disaster Recovery Grant Reporting (DRGR) module is a system grant recipients use to draw down grant funding and report grant activities to HUD. Recipients are required to report program activities and budget information for data collection.

- 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.

HUD required applicants to submit applications electronically through Grants.gov. Currently, post-award data such as quarterly reports (which include such information as activity and budget information, drawdowns, performance reports, and Federal Financial Reports or FFRs) will continue to be submitted via DRGR).

- 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 duplication of effort is caused by this collection.

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

The collection of information does not adversely impact small businesses or other small entities. Applicants must be nonprofits that provide nationwide or statewide programs that primarily serve disabled or low-income veterans.

- Describe the consequences 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.

Currently, information collected is required to determine that existing awards are administered correctly, in accordance to VHRMP requirements. Hence, this will circumvent Congress' directive to HUD to implement this pilot program. Data will be collected on a quarterly basis.

- 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; **If HUD determines more frequent reporting is necessary for the effective monitoring of the Recipient's performance or use of funds under the grant agreement, HUD may require the Recipient to submit its performance and financial reports on a monthly basis.**
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; **Not Applicable**
- requiring respondents to submit more than an original and two copies of any document; **Not Applicable**
- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years; **Not Applicable**
- 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; **Not Applicable**
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB; **Not Applicable**
- 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 **Not Applicable**
- 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. **Not Applicable**

There are no special circumstances that would cause any information collection to be conducted in a manner as explained in the Special Instruction. Mandatory, federal grant administration requirements of 2 CFR Part 200 address the maintenance of the appropriate files.

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.

This information collection was announced in the Federal Register, Volume 90; Page 24154, on June 6, 2025. No comments were received.

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

Information collection does not involve any payments or gifts to respondents other than remuneration of contractor or grantee.

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.

Respondents are not promised confidentiality and are advised at the time of collection that information obtained pursuant to this collection that is subject to the Freedom of Information Act (FOIA), 5 U.S.C. 552, may be released in response to a proper FOIA request, to the extent it is not exempted by FOIA.

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.

HUD will not collect personal information regarding specific individuals pursuant to this information collection. Grantees who receive VHRMP funds from HUD are required to determine the eligibility of individuals who receive benefits or assistance from the grant program based on the VHRMP NOFO, but HUD does not collect or maintain this information.

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.

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-2880	25	1	25	2.0	50.00	\$86.76	\$4,338.00
HUD-27061	25	1	25	0.5	12.50	\$86.76	\$1,085.00
HUD-50153	25	1	25	0.25	6.25	\$86.76	\$542.00
Disaster Recovery Grant Reporting (DRGR) system	25	4	100	2.0	200.00	\$86.76	\$17,352.00
Total	--	--	175	4.75	268.75	--	\$23,317.00

Explanation of Burden Hours: Number of responses is based on the number of eligible applicants under the Veterans Housing Rehabilitation and Modification Program proposed guidelines. The number of burden hours is based on information gathered from the Office of Rural Housing and Economic Development Program (ORHED) applicants. Application requirements and quarterly reporting requirements for the Veterans Housing Rehabilitation and Modification Program are modeled after the requirements of the ORHED program.

There is no additional cost regarding post-award collections. Closeout estimate costs will include voucher requests, final performance report, final financial report, final grant closeout agreement, and certificate of project completion documentation, which will equal 2.0 burden hours each (10 total burden hours). Total burden hours for twenty-five (25) grant recipients will equal 250 (25 x 10). The total burden hour costs will equal 250 total hours times the BLS/OES (Financial Manager) hourly rate \$86.76, which totals \$21,690 (250 x \$86.76).

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 the respondents.

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
HUD-2880	25	1	25	2.0	50.00	\$81.93	\$4,097.00
HUD-27061	25	1	25	0.5	12.50	\$81.93	\$ 1,024.00
HUD-50153	25	1	25	0.25	6.25	\$81.93	\$512.00
Disaster Recovery Grant Reporting (DRGR) system	25	4	100	2.0	200.00	\$81.93	\$16,386.00
Total	--	--	175	4.75	268.75	--	\$22,019.00

VHRMP is a competitive program in the Office of Rural Housing and Economic Development (ORHED). The ORHED has extensive experience and expertise in reviewing and managing competitive programs such as Self-Help Homeownership Opportunity Program (SHOP). The annualized cost to the Federal Government for a review of VHRMP applications, selection of grant recipients, and administration of oversight of the grants is an estimated total cost of **\$22,019.00** based on previous management and competitive program experience. The average cost to the Federal Government is based on an hourly rate of \$81.93, representing a GS-14, step-7 (based on the 2025 General Schedule Base).

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

This is a reinstatement of the currently approved collection. The current PRA has not been funded since FY 2023, so the PRA includes only post-award collections. Therefore, the VHRMP program operates in post-award status, which requires no pre-award forms due to no funds appropriated after FY 2023.

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 last VHRMP NOFO was published during FY 2023 with a total award of \$1,000,000 given to one (1) nonprofit organization. The timelines for the specific VHRMP NOFO publication date, closing date, and award date were contingent upon budget approval for FY 2023.

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.

Expiration date for the OMB approval will be displayed.

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

There are no exceptions to the certifications.

B. Collections of Information Employing Statistical Methods