Department of the Treasury Information Collection Request – Supporting Statement

Homeowner Assistance Fund OMB No. 1505-0269

Part A. Justification

1. <u>Circumstances necessitating the collection of information</u>

On March 11, 2021, the President signed the American Rescue Plan Act of 2021 (the "Act"), Pub. L. No. 117-2. Title III, Subtitle B, Section 3206 of the Act established the Homeowner Assistance Fund and provides \$9.961 billion for the U.S. Department of the Treasury (Treasury) to make payments to States (defined to include the District of Columbia, Puerto Rico, U.S. Virgin Islands, Guam, Northern Mariana Islands, and American Samoa), Indian tribes or tribally designated housing entities, as applicable, and the Department of Hawaiian Home Lands (collectively the "eligible entities") to mitigate financial hardships associated with the coronavirus pandemic, including for the purposes of preventing homeowner mortgage delinquencies, defaults, foreclosures, loss of utilities or home energy services, and displacements of homeowners experiencing financial hardship after January 21, 2020, through qualified expenses related to mortgages and housing.

Section 3206(c)(1) requires the eligible entities to use the funds for the purpose of preventing homeowner mortgage delinquencies, defaults, foreclosures, loss of utilities or home energy services, and displacements of homeowners experiencing financial hardship after January 21, 2020, through qualified expenses related to mortgages and housing. Section 3206(e)(1) provides that not later than 45 days after March 11, 2021, the Secretary shall pay each eligible entity. To date, eligible entities have generally received 10% of their allocations.

As of July 2025, HAF recipients with outstanding reporting requirements include 64 States, U.S. Territories, or Tribal Governments with HAF allocations of greater than \$5 million and 296 Tribal Governments and the Department of Hawaiian Home Lands with HAF allocations of less than \$5 million.

It is anticipated that one additional Tribal Government will request access to its HAF allocation for the first time in 2025 or early 2026.

The period of performance for all HAF recipients will end on September 30, 2026.

Quarterly Compliance Reports

Treasury will collect Quarterly Reports at the end of each calendar year quarter for eligible entities that are a State, U.S. Territory, or Tribal Government with a HAF allocation greater than \$5 million through Quarter 2 of 2026.

The Department of Hawaiian Home Lands and all Tribal Governments with a HAF allocation less than \$5 million will be required to submit one quarterly report in the Quarter 3 2025 Reporting Period.

The HAF Quarterly reports include, among other things, details on program budget; HAF Homeowner applications approved; targeting metrics around Homeowners assisted; individual program information; and individual program design element information.

Annual Performance Reports

Treasury will collect 2025 Annual Reports that provide Treasury with high-level information on how the HAF participant is performing relative to their forecasted goals noted in their HAF Grantee Plan.

Final Reports

Treasury will collect Final Reports from each Recipient to close out their HAF award. The Final Reports consist of two reports, the HAF Annual Report and the HAF Quarterly Report, which contains a new section to report on tangible personal property acquired with the HAF award.

2. Use of the data

The information reported will allow Treasury to ensure proper payments to the eligible entities.

Further, the information will permit Treasury to confirm an eligible entity has engaged in appropriate planning and adopted implementation policies that will ensure compliance with legal requirements and facilitate the most effective use of program funds. These confirmations will include the eligible' entity's (i) completion of appropriate outreach activities to determine the jurisdiction's relative needs for assistance to meet mortgage loan, utility, and property charge (e.g. taxes; condominium fees; common area assessments) expenses; (ii) that assistance will be awarded in a fair, equitable, and effective manner to meet such needs; (iii) adoption of meaningful performance metrics to ensure program effectiveness; and (iv) cognizance of budgetary restraints.

3. <u>Use of information technology</u>

Treasury will manage the submission process with the use of existing and widely available technology such as a web portal and e-mail.

4. Efforts to identify duplication

The information collections are under statutory mandates. The information is not known to overlap with any other data collected under any other information collections at Treasury. Furthermore, the information collection is tailored to leverage data that already exists and require only additional data that is necessary.

5. <u>Impact on small entities</u>

This collection of information will minimally affect small entities. However, Treasury will attempt to minimize burden on small entities to the greatest extent practicable. Note the Template captioned "Homeowner Assistance Fund Plan for Participants With Allocations Under \$5M" has been developed specifically for this purpose.

6. Consequences of less frequent collection and obstacles to burden reduction

Treasury will collect only the information required to make any payments to the eligible entities. The eligible entities will submit a limited amount of information that should be readily available to the entity in the ordinary course of business. If the eligible entities are unable to provide their completed Templates, Treasury would not be able to make payment to those eligible entities of their remaining allocations of HAF Funds.

7. Circumstances requiring special information collection

There are no special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

8. <u>Solicitation of comments on information collection and justification for expedited processing</u> pursuant to 5 C.F.R. § 1320.13

Treasury solicited public comment for 60 days on the quarterly and annual reports on May 8, 2025 (90 FR 19792). Treasury received no public comments.

9. Provision of payments to respondents

No payments or gifts are provided to respondents.

10. Assurance of confidentiality

Information collected will be kept confidential to the extent appropriate and consistent with the Freedom of Information Act and other applicable laws.

11. <u>Justification of sensitive questions</u>

No sensitive questions will be asked of eligible entities.

12. Estimate of the hour burden of information collection.

The estimated burden for collecting and reviewing the HAF remaining 2025 and 2026 Quarterly Reports, the 2025 Annual Reports and the required Final Reports are as follows*:

Reporting	#	#	Total	Hours per	Total	Cost to
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	Respondents	Responses Per Respondent	Responses	response	Burden in Hours	Respondent (\$54.19 per hour**)
Term Sheet	1	1	1	1 1 hour		\$54.19
HAF Plan Templates	1	1	1	2 hours	2	\$108.38
Quarterly Compliance Report – State or >\$5M Allocation	64	5	320	4 hours	1,280	\$69,363.20
Quarterly Compliance Report – DHHL or <\$5M Allocation	296	1	296	4 hours	1,184	\$64,160.96
2025 Annual Performance Report	360	1	360	2 hours	720	\$39,016.80
Final Quarterly Report	360	1	360	4.5 hours	1,620	\$87,787.80
Final Annual Report	360	1	360	2 hours	720	\$39,016.80
Total	Varies	Varies	1,698	Varies	5,527	\$299,508.13

^{*}All time estimates include the time for Participants to collect data from the recipient and to report the data to Treasury.

13. Estimated total annual cost burden to respondents

^{**}Bureau of Labor Statistics (BLS), U.S. Department of Labor, Occupational Outlook Handbook, Accountants and Auditors, on the Internet at https://www.bls.gov/ooh/business-and-financial/accountants-and-auditors.htm (visited July 25, 2025). In 2024, the median pay for accounts and auditors was \$39.27/hour. To account for the fully-loaded employer cost of employee compensation, the median pay is increased by 38%, resulting in a fully-loaded wage rate of \$54.19. According to BLS's Employer Cost for Employee Compensation from March 2025 (released on June 13, 2025: https://www.bls.gov/news.release/pdf/ecec.pdf), employers provided 38% of total employee compensation in the form of non-wage compensation (i.e., benefits such as paid leave, health insurance, etc.) for state and local government workers.

There are no annualized capital/startup costs for the eligible entities to provide the information in the form or certification.

14. Estimated cost to the federal government.

There will be no annualized capital/start-up costs for the government to receive this information. The below table reflects the estimated time for a GS-13, Step 1 to review the remaining information to be collected.

		Average			
		Review	Total		
		Time per	Time to	Average	Total Annual
	Number of	Response	Review	Hourly	Government
Collection Instrument	Responses	(in hours)	(in hours)	Wage Rate ¹	Cost
Homeowner					
Assistance Fund					
Compliance Reporting	616	40	24,640	\$57.78	\$1,423,699.20
and Recordkeeping -					
Quarterly					
Homeowner					
Assistance Fund					
Compliance Reporting	360	40	14,400	\$57.78	\$832,032.00
and Recordkeeping -					
Annual					
Final Quarterly Report	360	40	14,400	\$57.78	\$832,032.00
Final Annual Report	360	40	14,400	\$57.78	\$832,032.00
Total	1,696		67,840		\$3,919,795.20

15. Reasons for change in burden

Acceptance of Award Terms Form, Notice of Funds Request Form, Participant Payment Information Form, and Title VI Assurances have been removed as the HAF program application deadline has passed. Overall number of respondents has declined because some entities that were allocated HAF funds did not participate in the HAF program and others have expended most of their HAF funds and have closed out of the program.

16. Plans for tabulation, statistical analysis, and publication

Treasury plans to publish the data for disbursements.

17. Display of the expiration date for OMB approval

¹GS-13 wage rate from the 2025 GS-pay scale table for Washington-Baltimore-Arlington, DC-MD-VA-WV-PA, https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/DCB h.pdf ,

Treasury plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Exceptions to submission requirements

There are no exceptions to the submission requirements.

Part B. Describe the use of statistical methods such as sampling or imputation.

This collection does not employ statistical methods.