

Reducing Unnecessary Field Reporting Requirements

January 17, 1991

MEMORANDUM FOR: Christopher G. Wye, Director
Policy Coordination Unit, COOP

FROM: Don I. Patch, Director
Office of Block Grant Assistance, CBE

SUBJECT: Reducing Unnecessary Field Reporting Requirements

This is in response to your memorandum dated December 19, 1990, identifying the Grantee Performance Report (GPR) as a report recommended by the Field for which an additional copy should be obtained from grantees. Currently grantees are submitting an original and two copies, and certain Field Offices would like to be able to request a third copy from the grantee to alleviate xeroxing the additional copy by HUD staff. This office agreed to pursue this by requesting approval by OMB. Based on what we have learned, we now nonconcur in that request.

We have been advised that OMB will not authorize obtaining an additional copy, since under the provision of 5 CFR 1320.6, General Information Collection Guidelines, it may not do so unless it is necessary to satisfy a statutory requirement or some other substantial need. We think it would be a wasted effort to pursue this with OMB given the fact that it could be argued that this requirement would not provide any additional benefit for grantees, while imposing additional costs on them associated with reproduction and postage. In addition, it could be argued that HUD could just as easily make the extra copy.

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