

# Paperwork Reduction Act Submission

Please read the instruction before completing this form. For additional forms or assistance in completing this forms, contact your agency's Paperwork Reduction Officer. Send two copies of this form, the collection instrument to be reviewed, the Supporting Statement, and any additional documentation to: Office of Information and Regulatory Affairs, Office of Management and Budget, Docket Library, Room 10102, 725 Seventeenth St. NW, Washington, DC 20503.

1. Agency/Subagency Originating Request: <b>U.S. Department of Housing and Urban Development</b> Office of Housing, Office of Housing Assistance Contract Administration Oversight, Neighborhood Networks Staff		2. OMB Control Number: a. <b>2502-0553</b> b. None	
3. Type of information collection: (check one) a. <input type="checkbox"/> New Collection b. <input checked="" type="checkbox"/> Revision of a currently approved collection c. <input type="checkbox"/> Extension of a currently approved collection d. <input type="checkbox"/> Reinstatement, <b>without change</b> , of previously approved collection for which approval has expired e. <input type="checkbox"/> Reinstatement, <b>with change</b> , of previously approved collection for which approval has expired f. <input type="checkbox"/> Existing collection in use without an OMB control number For b-f, note item A2 of Supporting Statement instructions.		4. Type of review requested: (check one) a. <input checked="" type="checkbox"/> Regular b. <input type="checkbox"/> Emergency - Approval requested by c. <input type="checkbox"/> Delegated 5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 6. Requested expiration date: a. <input checked="" type="checkbox"/> Three years from approval date      b. <input type="checkbox"/> Other (specify)	
7. Title: <b>Neighborhood Networks Management and Tracking Data Collection Instruments</b>			
8. Agency form number(s): (if applicable) None			
9. Keywords: Housing, Computer Technology, Centers, Neighborhood Networks, Multifamily, Technological Advancement, Classification, START, Center Profile, Center Contact			
10. Abstract: HUD collects information from the Neighborhood Networks Centers to assist center directors in the development of business plans and operating procedures and to track and evaluate the development and implementation of center programs.			
11. Affected public: (mark primary with "P" and all others that apply with "X") a. Individuals or households b. <b>X</b> Business or other for-profit c. <b>P</b> Not-for-profit institutions e. Farms f. Federal Government g. State, Local or Tribal Government		12. Obligation to respond: (mark primary with "P" and all others that apply with "X") a. Voluntary b. <b>P</b> Required to obtain or retain benefits c. Mandatory	
13. Annual reporting and recordkeeping hour burden: a. Number of respondents: 1,200 b. Total annual responses: 3,754 Percentage of these responses collected electronically: 80% c. Total annual hours requested: 2,902 d. Current OMB inventory: 980 e. Difference (+,-): +1,922 f. Explanation of difference: 1. Program change: +961 2. Adjustment: +961		14. Annual reporting and recordkeeping cost burden: (in thousands of dollars) Do not include costs based on the hours in item 13. a. Total annualized capital/startup costs: \$0.00 b. Total annual costs (O&M): \$0.00 c. Total annualized cost requested: \$0.00 d. Total annual cost requested: \$0.00 e. Current OMB inventory: \$0.00 f. Explanation of difference: 1. Program change: 2. Adjustment:	
15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X") a. Application for benefits b. <b>P</b> Program evaluation c. <b>X</b> General purpose statistics d. Audit e. <b>P</b> Program planning or management f. Research g. Regulatory or compliance		16. Frequency of recordkeeping or reporting: (check all that apply) a. <input checked="" type="checkbox"/> Recordkeeping      b. <input type="checkbox"/> Third party disclosure c. <input checked="" type="checkbox"/> Reporting: 1. <input type="checkbox"/> On occasion      2. <input type="checkbox"/> Weekly      3. <input type="checkbox"/> Monthly 4. <input checked="" type="checkbox"/> Quarterly      5. <input type="checkbox"/> Semi-annually      6. <input checked="" type="checkbox"/> Annually 7. <input type="checkbox"/> Biennially      8. <input checked="" type="checkbox"/> Other (as needed)	
17. Statistical methods: Does this information collection employ statistical methods? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		18. Agency contact: (person who can best answer questions regarding the content of this submission) Name: <b>Shirley Machonis</b> Phone: <b>202-708-2866 ext. 2539</b>	

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## 19. Certification for Paperwork Reduction Act Submissions

On behalf of the U.S. Department of Housing and Urban Development, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9.

**Note:** The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320/8(b)(3) appears at the end of the instructions. The certification is to be made with reference to those regulatory provisions as set forth in the instructions.

The following is a summary of the topics, regarding the proposed collections of information that the certification covers:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities;
- (d) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) It indicates the retention periods for recordkeeping requirements;
- (g) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
  - (i) Why the information is being collected;
  - (ii) Use of the information;
  - (iii) Burden estimate;
  - (iv) Nature of response (voluntary, required for a benefit, or mandatory);
  - (v) Nature and extent of confidentiality; and
  - (vi) Need to display currently valid OMB control number;
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to collected (see note in item 19 of the instructions);
- (i) It uses effective and efficient statistical survey methodology; and
- (j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in item 18 of the Supporting Statement.

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Signature of Program Official:

Date:

X  
Kevin B. Perkins, Director, Organizational Policy, Planning and Analysis Division, HROA

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Signature of Senior Officer or Designee:

Date:

X  
Lillian Deitzer, Departmental Reports Management Officer,  
Office of the Chief Information Officer

## Supporting Statement

2502-0553

### Neighborhood Networks Management and Tracking Data Collection Instruments

#### A. JUSTIFICATION

1. In accordance with HUD's mission to support community development, the Office of Multifamily Housing Programs continues to encourage property owners and managers to create and maintain Neighborhood Networks centers; include residents in the developing and operating of the centers; develop and implement programs and services at the centers that the residents need and will use; track and evaluate center program performance and attendance; and reach out to community stakeholders for the purpose of building partnerships for the sustainability of the centers. The number of Neighborhood Networks centers has grown considerably since its inception and so has the need for effective communication between center directors and HUD Neighborhood Networks Coordinators. Further, the development and communication of structures that improve overall efficiency is critical, given the large number of Neighborhood Networks centers.

In 2003, OMB approved the data collection for a Telephone Survey of Neighborhood Networks Center Directors (#2502-0553) for a period of one year. In September 2004, OMB granted HUD clearance to collect operational and demographic information for an additional two years under the existing clearance to assist center directors in the development of business plans and operating procedures, and to track and evaluate the implementation of center programs. The 2004 data collection merged information captured in paper business plans and information from an online Neighborhood Networks Strategic Tracking and Reporting Tool (START) with data collected through a telephone survey of center directors. This approach was a multi-step interactive process as the business plan continued to evolve from a paper submission to an enhanced and more comprehensive online START.

With this submission, HUD is requesting renewal of OMB clearance for the enhanced Neighborhood Networks START and the paper business plan. HUD is also requesting clearance for three associated tools and data collections:

- The Online Classification Tool
- Electronic Postcards
- Telephone Follow-up Call

2. The respondents are the representatives of each of the 1200 Neighborhood Networks centers. The current data collection will assist HUD in updating the Neighborhood Networks contacts and START databases and HUD's *Directory of Neighborhood Networks Centers*. Updated business plan data and center profiles will continue to provide quantifiable demographic information as a basis for ongoing technical assistance to Neighborhood Networks center directors and HUD Neighborhood Networks Coordinators. Center classification data will ensure effectiveness in creating programs and services that promote self-sufficiency among residents of HUD Multifamily Housing Properties.

The proposed data collection effort will assist HUD in continuing to provide up-to-date information regarding the status of Neighborhood Networks centers; closer contact among HUD Neighborhood Networks headquarters staff, HUD Neighborhood Networks Coordinators, and center directors; and valuable links to information connecting Neighborhood Networks Centers with partners. In addition, the information collection will continue to support Neighborhood Networks center directors and staff in making informed decisions, documenting the outcomes of their center, and assessing overall center performance.

## **Business Plan and Strategic Tracking and Reporting Tool (START)**

Neighborhood Networks center business plans are essential planning and management tools for Neighborhood Networks centers. From an operational standpoint, it is the business plan that will keep the center on-course, ensuring that essential tasks are carried out as intended. Business plans also provide the basis for center-level evaluations and program tracking analyses. For example, where significant Federal funds are requested for center operations, a methodology designed to measure results and program success is required by the Government Performance and Results Act of 1993.

The plans are a guide for the future development and direction of Neighborhood Networks centers and, as such, should be a reliable indicator of future performance. Through the use of advanced technology, the online START enhances planning and operations among Neighborhood Networks centers and provides more reliable data for use by HUD Neighborhood Networks Coordinators and center staff. Business plans are required every three years, with annual updates as appropriate.

START includes all of the critical information that is captured in paper business plans and paper assessment and evaluation forms with significant enhancements designed to provide more standardized and more comprehensive information, and facilitate data collection and reporting. Further, the online format significantly reduces the amount of narrative text required from centers.

In collaboration with HUD multifamily property owners, residents, service coordinators, and local community partners, HUD created sample business plan and assessment formats for use by directors in the development of Neighborhood Networks Centers. The samples, which serve as instructional tools or guidance for Center directors, can be found on the Neighborhood Networks Web site, and adopt the format of those used for the Public and Indian Housing Resident Opportunities and Self-Sufficiency (ROSS) program NOFA (OMB Approval No. 2577-0229).<sup>1</sup> It should be noted that ROSS tools were included for *reference and educational* purposes only. The actual format of Neighborhood Networks Center paper business plans vary by Center. A sample business plan format and assessment tool is attached.

### **Center Profile Tool**

Before Centers submit a business plan, they need to setup a center profile through START and obtain login information. The Center Profile Tool within START allows center staff to create and modify profile data online. The electronic process facilitates the review and approval of profiles by HUD Neighborhood Networks Coordinators, since the information provided by the center is immediately accessible from the Neighborhood Networks Web site.

Neighborhood Networks Center Staff:

- Create/modify and submit a Center Profile for approval.
- Receive feedback (comments) about the Center Profile from their respective HUD Neighborhood Networks Coordinator.

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<sup>1</sup> Section 538 of the Public Housing Reform Act (Pub. L. 105-276, 112 Stat. 2461) added a new section 34 to the U.S. Housing Act of 1937, which provides a mandate to link supportive services to help public housing residents achieve economic self-sufficiency. The Resident Opportunities and Self-Sufficiency (ROSS) program provides funding to Public Housing Authorities, Tribes/Tribally Designated Housing Entities, resident organizations, and qualified nonprofit organizations to provide a comprehensive array of educational and supportive services. Interested parties submit applications for grant categories, including Resident Service Delivery Models-Family, Resident Service Delivery Models-Elderly/Persons with Disabilities, Family Self-Sufficiency for Public Housing, Homeownership Supportive Services, and Neighborhood Networks.

HUD Neighborhood Networks Coordinators:

- Select and review Center Profiles associated with their field office.
- Review, edit content and add comments to the submitted Center Profiles.
- Send an e-mail to the center, enabling the center to open the profile and read comments that have been entered by the reviewer.

HUD management staff:

- Select and review all center and HUD Neighborhood Networks Coordinator submitted profiles.
- Review, edit contents and add comments to submitted center and HUD Neighborhood Networks Coordinator Profiles.
- Send an e-mail to the center or HUD Neighborhood Networks Coordinator, enabling them to open their profile and read comments that have been entered by the reviewer.

## **Classification Tool**

In the summer of 2005, HUD established a classification system that automates the designation of Neighborhood Networks centers into three levels of classification, namely Designated, Certified, and Model. The classifications are in accordance with the standards set for the Neighborhood Networks Initiative. As indicated above, the classification process provides benchmarks as a guide for center programming, evaluation, financial sustainability, partnerships, technology assessments, and resident involvement.

All operational Neighborhood Networks Centers with a HUD-approved business plan are considered Level 1 (Designated) Centers. Further, centers that were established prior to implementation of the certification process were “grandfathered” in as Level 1 Centers.

Level 2 (Certified) Centers must have attained Designated status, and additionally must have been operational for at least 12 months, have submitted an electronic business plan via START, have a HUD-approved Assessment and Evaluation Form from START, and actively operate programs to support residents’ self-sufficiency.

Level 3 (Model) Centers must have achieved Designated and Certified status and they must also demonstrate attainment of seven mandatory Model Standards related to period of operation, resident involvement, program guidelines, tracking, evaluation and reporting, partnerships, funding, and Center environment. In addition Level 3 classification includes two optional standards pertaining to 501 (c)(3) status and center governance.

Level 3 (Model) Centers must have achieved Designated and Certified status and they must also demonstrate attainment of seven mandatory Model Standards related to period of operation, resident involvement, program guidelines, tracking, evaluation and reporting, partnerships, funding, and Center environment. In addition, Level 3 classification includes two optional standards pertaining to 501 (c)(3) status and center governance. Level 3 Classification is the only level that requires the center to make a request for model classification review.

Center classification establishes minimum achievable standards to ensure effectiveness in creating programs and services that promote self-sufficiency among residents of HUD Multifamily Housing Properties. The three-level certification process adheres to nationally developed performance standards, or standards of operation based on extensive review and analysis. Additionally, certification binds centers together, creating a network of similar centers committed to the same standards. Centers achieving Model (Level 3) status can serve as mentors for other Centers and stakeholders.

The Center Classification Tool provides automatic evaluation of center data, enabling centers to be automatically classified as Designated (Level 1) and Certified (Level 2) based on system data either collected by the contractor or

as a byproduct of collecting data through START. Center data is required to be entered for the attainment of Model (Level 3) status because this information is not otherwise collected through other business processes.

A screenshot and description of the proposed Classification Tool to automate this process, including a complete description of each classification level and a section justification, is attached.

### **Electronic Postcard and Telephone Follow-up**

HUD is proposing to send pre-filled electronic e-mail postcards to all Neighborhood Networks centers, asking respondents to verify basic contact information, and make any necessary corrections. Data will be collected annually on a quarterly basis with each data collection period extending over a one-month period.

Telephone follow-up calls will be conducted to retrieve information from non-respondents to the postcard mailing.

The proposed e-mail postcard and telephone follow-up data collections are authorized under Title 12 (12 U.S.C. 1701z-1 et seq.). The personalized contacts will further assist HUD in updating the Neighborhood Networks contact database and *Directory of Neighborhood Networks Centers*. Coupled with the online Center Profile Tool, the data collection will help to maintain a comprehensive and current profile of the Neighborhood Networks center population, and will result in more effective communications and technical assistance strategies.

The proposed text and format of the postcard and telephone follow-up script, and an item-by-item justification, are attached.

3. The START, Classification, and Center Profile Tools facilitate business plan development and reporting through the use of online instruction, completion, and submission. The data collection is further enhanced by recently implemented tool improvements such as system-generated e-mails to centers, reminding them to complete and submit their business plans to their HUD Neighborhood Networks Coordinators, as well as e-mails to HUD Neighborhood Networks Coordinators reminding them to complete their review and evaluation of submitted center profiles and business plans in a timely manner. START also utilizes its integrated database by allowing centers to view previously submitted business plans while recording their actual accomplishments in the online assessment tool. START further utilizes technology by providing online management and statistical reporting of center information across field offices and nationally for HUD Neighborhood Networks Coordinators and other participating HUD staff members.

The Center Classification Tool will provide automatic evaluation of center data, enabling centers to be automatically classified as Designated (Level 1) and Certified (Level 2) based on data collected through START. Center data is required to be entered for the attainment of Model (Level 3) status because this information is not otherwise collected through other business processes. As with START, this tool utilizes technology to provide related online management and statistical reports for HUD Neighborhood Networks Coordinators and other participating HUD staff members.

Finally, the postcard data collection will be administered electronically to facilitate response.

Taken together, the electronic data collection processes will increase the speed, efficiency, and accuracy of data collection, which in turn, will reduce overall respondent burden.

4. The information to be gathered from the current data collection is not available in its entirety from any other source. In 2003, HUD conducted a national survey of Neighborhood Networks center directors to document center characteristics and identify commonalities and trends (OMB No. 2502-0553). A 2004 data collection and tracking process (administered under an extension of the same OMB Clearance) provided updated information on center

characteristics and specific program attributes. The current data collection will continue to provide HUD with updated information regarding center demographics and operations.

Through the use of technology, the Center Profile, START, and the Classification tools minimize duplication of data entry. First, the Center Profile tool minimizes data redundancy by automatically retrieving previously submitted center profiles when a center desires to update their online center and property information. Additionally, by the use of an integrated database management system, the START and Classification tools utilize previously collected contact information from the Center Profile tool when identifying centers and generating online reports. Finally, the Classification tool utilizes information collected by START to automatically classify centers as Designated (Level 1) or Certified (Level 2).

5. Most Neighborhood Networks centers are relatively small entities with a combination of full-time and part-time employees. The following procedures have been put in place to minimize the burden on center directors:

The online business plan tool (START) has been enhanced to further minimize burden on Neighborhood Networks centers when developing or modifying business plans and to assist center staff in tracking activities. The tool was also designed with the goal of helping small centers to identify potential community resources and partners and increase resident participation. To ensure proper usage of START and to minimize the burden of START's usage, a detailed but straightforward user guide and workbook has been developed for use by both center and HUD staff to assist in completing the electronic business plan. Additionally, the tool enables centers to reuse information previously collected in previous business plans when producing subsequent versions, and also enables data collected through the Center profile to be used in generating Business Plan reports.

Based on feedback from six Neighborhood Networks centers, the individual reporting burden per respondent (or average amount of time required to complete START) is approximately two and three-quarter hours. This estimate includes time for reviewing and completing the user guide, as appropriate. The estimated time required to complete the less comprehensive paper business plan is approximately two hours.

The three-level certification process utilized during center classification encourages mentorship by Model (Level 3) Centers and provides benchmarks for center sustainability. This is particularly useful for small and newly established Neighborhood Networks centers. As stated above, this tool minimizes the impact on small entities by automatically accessing information collected by START and center profiles in assessing and reporting on centers' levels of classification.

The Center Profile tool within START redisplay information previously collected by the tool for its update process. This not only reduces data redundancy by the small entities that use the tool, but it also assists with data accuracy and data entry.

HUD has proposed a personalized electronic postcard data collection (with telephone follow-up) to verify and supplement the information collected in the Center Profile Tool. This three-tiered data collection approach could prove particularly beneficial for smaller centers with limited computer capacity. The combined approach will help to maintain a current profile of Neighborhood Networks centers, while minimizing overall burden on center staff.

6. New Neighborhood Networks centers are required to complete business plans covering a period of 3 years, with annual updates as appropriate. Because existing Neighborhood Networks centers are constantly growing and new centers are rapidly evolving, collection of this updated information is essential to providing a meaningful, reliable resource to HUD and center directors.

HUD has identified a few cases (fewer than 10 percent) in which the same individual directs more than one Neighborhood Networks center. These are cases in which the director manages more than one center with designated coordinators at each center. In these instances, a single business plan is submitted for the group of related centers in the jurisdiction. This minimizes data entry and reduces the approval process for the related Neighborhood Networks centers.

With regard to Center Profiles, there is no specified frequency for data collection and updates. Center Profiles are updated by centers as desired and as necessary.

Centers are classified as Designated (Level 1), Certified (Level 2), and (Level 3) classification by the Classification tool. When a center requests model center classification, they must provide documentation that the seven required standards are met. The only additional data collection is to correct their submitted requests as specified (and if needed) by their HUD Neighborhood Networks Coordinator and/or the Neighborhood Networks Director for approval purposes.

If the centers' business plan data is captured through START less frequently, centers will be less likely to sustain themselves as organizations. START allows centers to plan for sustainability by collecting budget projections, program goals and outcomes, and established partnerships. It can also be revisited to serve as a tracking and evaluation tool, which allows centers to adjust their budget and program curriculum as needed to ensure successful results. Less frequent data collection would undermine the Center Classification system, as centers are automatically assigned Designated (Level 1) and Certified (Level 2) status via data collected by the START tool. In addition, centers use the START tool to update their contact information, which occurs often due to frequent staff turnover. Without those updates, centers will be unable to benefit from resources and services offered by HUD.

Less frequent collection of data collected by the Classification tool would result in a reduced number of Model centers. This will not only undermine the Classification system, but will also weaken the Neighborhood Networks Initiative as a whole due to the reduced number of centers "that serve as models of excellence." These Model centers provide an example for not only fellow Neighborhood Networks centers, but also for external stakeholders that may wish to partner with or support the overall Initiative.

Ultimately, less frequent collection would reduce the overall number of Neighborhood Networks centers and weaken those centers that still manage to remain in operation.

7. There are no special circumstances that would require the information to be collected in a manner that is not consistent with the above-referenced Federal guidelines.
8. In accordance with 5 CFR 1320.8(d), the agency's notice soliciting public comments was announced in the *Federal Register* on May 25, 2006 (Vol. 71, No. 101, page 30147). No comments were received.

Under HUD Contract C-PHI-00850 (BPA), Task Order #3, Aspen Systems Corporation, a wholly owned subsidiary of Lockheed Martin Information Technology, incorporated the enhancements to START, developed the Classification and Center Profile Tools, and designed the electronic postcard data collection. Aspen assisted in developing the original prototypes for Neighborhood Networks services and products when the Neighborhood Networks Initiative was introduced in 1995 and has provided initial support to Neighborhood Networks center staff nationwide through training and workshops.

The specific Aspen staff members involved in designing the current data collection are listed below:

- Anthony Cain, Neighborhood Networks Project Director, 301-519-5706



- Stacey Jones-Speight, Senior Information Systems Manager, 301-519-5951
- Peng Yan, Manager, Information Systems, 301-519-5850
- Youqi Ma, Senior Programmer Analyst, 301-519-5824
- Ling Chi, Systems Analyst, 301-519-5636
- Vickie Schachter, Program Development Manager, 301-519-5081

HUD contacted Neighborhood Networks Centers to obtain an estimate of the time required to complete START and the Classification Tool. The table below shows the Neighborhood Networks centers contacted and the estimated time to complete the electronic tools. Following the table is a summary of comments regarding the overall data collection process (e.g., clarity of instructions) and the frequency of data collection.

Center, Contact Person	Hours Required to Complete	
	START	Center Profile Tool
Audubon Towers Computer Learning Center Mary Kay Murray (856) 546-9111	1.0	0.25
Pathway to the Future Learning Center LaKeisha Jackson (317) 890-1624	3.0	0.33
St. Joseph/HANDS Center Kim Whalen (814) 454-5080	2.5	1.00
Adams Landing Apartments Center Jay Sullivan (304) 525-0843	3.0	0.50
CWA-Cayce Community Learning Center Rebecca Foy (615) 248-4029	4.0	0.33
Hazelcrest Place Computer Center Fay Mansor (248) 542-5445	3.0	0.50
<b>Total Hours</b>	<b>16.5</b>	<b>2.91</b>
<b>Average Hours to Complete:</b>	<b>2.75</b>	<b>.49</b>

Center, Contact Person	Hours Required to Complete Classification Tool
Creekwood Village Neighborhood Networks Center Clarence Sutton, Sr. (205) 349-5283	.33
CWA-Cayce Community Learning Center Rebecca Foy (615) 248-4029	.08
<b>Total Hours</b>	<b>.41</b>
<b>Average Hours to Complete:</b>	<b>.21</b>

Respondents felt that the instructions were relatively clear, and remarked that they greatly appreciated the technical assistance offered by HUD to assist with the data collection process.

The Neighborhood Networks team also conducted a pretest of the electronic postcard text and telephone follow-up script to identify any question wording or ordering that was unclear to respondents and to determine if any key measures had been omitted from the instruments. In addition, the postcard pretest provided an estimate of respondent burden in terms of the amount of time required to complete the data collection and the extent to which questions could be answered without advance notice and/or records review. Finally, Aspen was able to judge the accessibility of Neighborhood Networks center directors and determine the most effective means of reaching respondents.

To simulate the proposed data collection method, the Neighborhood Networks team conducted the postcard pretest on February 13, 2006 using a combined e-mail/telephone methodology. The data collection was tested with seven randomly selected respondents who represent the population. These selected centers are geographically dispersed and represent a variety of housing developments and centers.

The table below shows the Neighborhood Networks centers/respondents included in the postcard pretest.

Center, Contact Person	Time Required to Complete Electronic Postcard and Telephone Call
Forest Cove Apartments Neighborhood Networks Center Jawanza Sabir (757) 543-4147	3 minutes
Rose of Sharon Elke Teague (912) 234-5417	10 minutes
Council Groves Neighborhood Networks Center Kathy Dutton (406) 542-2922	5 minutes
Havre Eagles Manor Pat Anderson (406) 265-5531	2 minutes
Whitney Young Manor Computer Center Francisco Lozaro (914) 423-3570	5 minutes
CPDC Gateway at Edgewood Terrace Jessica Venegas (202) 350-8221	3 minutes
Audubon Towers Computer Learning Center Mary Kay Murray (856) 546-9111	3 minutes
<b>Total Length of Data Collection</b>	<b>31 minutes</b>
<b>Average Length of Data Collection</b>	<b>4.4 minutes</b>

The Neighborhood Networks team asked several brief follow-up questions to identify ambiguous items or response choices, problems with question ordering, etc., and to estimate the time required to complete the data collection. Respondents remarked that the questions were easy to understand and would not require advance notice to complete. Overall, there were no issues raised by respondents other than concern at having to provide similar updates on a quarterly basis.

9. Business plans are required for certification of new centers and do not include remuneration. Further, respondents will not receive monetary payment or gifts in return for participation in the postcard data collection or for electronic Classification or Center Profile completion.
10. The purpose of the combined data collection is to obtain a demographic profile of Neighborhood Networks centers and identify successful program areas and practices. The results will be used to update tracking databases and the HUD *Directory of Neighborhood Networks Centers*. Specific center business plan information is password-protected and cannot be accessed by the general public or by other centers. However, HUD Neighborhood Networks Coordinators, HUD program members, and technical assistance staff can track each center's activities.

The information requested does not lend itself to confidentiality.

11. There are no questions of a sensitive nature included in this collection.

## 12. Estimated Respondent Burden

There are approximately 1,200 Neighborhood Networks Centers currently in operation.

Approximately 330 of Centers are using START, which is required every three years with annual updates, as required. HUD estimates all 330 Centers use the Center Profile Tool annually, and 250 Centers use Start annually to update business plans.

830 Centers currently have a paper business plan. HUD estimates 277 Centers will update those paper business plans annually.

12 Centers are using the Classification Tool.

HUD estimates an additional 5 Centers per year will request designation as a Model Center and provide the required documentation.

Based on an estimated 60 percent response rate, approximately 720 of the 1,200 Neighborhood Networks Centers are expected to respond to the postcard data collection—either electronically or by telephone.

Information Collection	Total Annual Responses	Hours per Response	Total Annual Hours	Hourly Cost	Total Annual Cost
Center Profile Tool	330	0.49	162	\$11.55	\$1,871
START Data Collection	250	2.75	908	\$11.55	10,487
Paper Business Plan	277	6.00	1,622	\$11.55	19,196
Classification Tool	12	0.21	3	\$11.55	35
Level 3 documentation	5	1.00	5	\$11.55	58
Quarterly Electronic Postcard	2,880	0.07	202	\$11.55	2,333
<b>Totals</b>	<b>3,754</b>		<b>2,902</b>		<b>\$33,980</b>

The average rate of pay for Neighborhood Networks Center Directors is estimated at \$24,100 annually or \$11.55 per hour. The rate represents the previously approved rate of \$10.50 per hour (based on a review of comparable HUD job descriptions) and a 10-percent increase for escalation of living expenses over the past two years.

13. There are no additional costs to respondents associated with this data collection.

14. Estimated cost to the government

HUD field staff review the START data (including the Center Profile Tool) or paper business plans. They also review the Classification Tool and the documents submitted with a request for Level 3 status.

Information Collection	Total Annual Responses	Hours per Response	Total Annual Hours	Hourly Cost	Total Annual Cost
START Data Collection (and Center Profile Tool)	250	.50	264	\$33	\$8,712
Paper Business Plan	277				
Classification Tool and Level 3 documentation	12	.75	13	\$33	429
	5				
<b>Totals</b>	<b>3,754</b>		<b>2,902</b>		<b>\$9,141</b>

Hourly rate is based on the average annual salary of a GS-12, Step 1.

**HUD’s contractor maintains the Neighborhood Networks system and will process the electronic postcard and follow up phone calls. The annualized cost to the government for business plans, center profiles, classification, and the postcard data collection processes are as follows:**

Information Collection	Cost of Technical assistance	Hours spent on system maintenance & support	Average hourly rate for system maintenance & support	Non-labor costs	Total Annual Cost
START Data Collection & Profile Tool	\$177,892.00	2731	\$74.00	\$29,024.00	<b>\$407,150.00</b>
Classification Tool	\$14,967.00	341	\$74.00	\$952.00	<b>\$25,234.00</b>
Request for Model Status					
Electronic Postcard	None	None	None	None	<b>\$12,445.38</b>
<b>Totals</b>					<b>\$444,829.38</b>

Total HUD staff and contractor costs: \$453,970.38.

15. This is a request for a revision to a currently approved collection. The change in overall burden from the previous OMB submission reflects enhancements to the START system, fewer paper business plan submissions, and an increase in the number of Centers completing online business plans. Similar to the previous submission, the proposed data collection combines information from multiple vehicles. However, this submission includes a brief postcard (as opposed to a full-scale survey), and a Center Classification Tool.
16. Results of this collection will be published in an annual report profiling Neighborhood Networks centers and identifying data trends. The report will serve as a guide for ongoing technical assistance, support, and/or information for Neighborhood Networks stakeholders.

Since all new centers are required to complete a business plan, and centers update plans as necessary, business plan and associated data (e.g., classification and profile data) are collected on an ongoing basis. The postcard data collection and telephone follow-up will begin immediately upon receipt of OMB clearance. Data will be collected annually on a quarterly basis with each data collection period extending over a one-month period.

Data from the business plan, Center Classification, and Center Profile databases are primarily used by HUD Coordinators for communication with center staff and targeting technical assistance resources. Information is also periodically used for internal evaluations and data analyses. In these instances, statistical tests of association may be performed between key variables (i.e., State, region, or field office) to identify significant relationships between variables.

17. The OMB approval number and expiration date will be displayed on sample business plan formats, and will appear on the home page of each online form. Further, the OMB approval number and expiration date will be read to all respondents during the telephone follow-up call to retrieve postcard data.
18. The data collection involves no exceptions to the Certification for Paperwork Reduction Act.

## **B. INFORMATION EMPLOYING STATISTICAL METHODS**

1. The respondent universe includes approximately 1,200 active Neighborhood Networks Centers as identified from the Neighborhood Networks database. All centers are required to submit a business plan, with an estimated 25 percent expected to complete or update online business plans annually. Further, all Neighborhood Networks centers are encouraged to complete the Classification and Center Profile Tools, as appropriate; and the postcard data collection will be attempted with all centers. Therefore, sampling stratification procedures are not applicable to this data collection.

### **2. *Business Plan/START, Classification, and Center Profile Data Collections***

Centers are asked to create a business plan for three consecutive fiscal years. A fiscal year is defined as the period beginning October 1<sup>st</sup> of the calendar year and ending September 30<sup>th</sup> of the following calendar year. New centers are asked to provide a start-up budget and a projected operational budget for future years. Existing centers are asked to provide their current budget and projected future budgets. New centers are asked for all other information based on a projection of what they believe will happen during the startup year. Existing centers are also asked to report information about the current year.

After a business plan is approved, all centers are requested to update the business plan annually. They are also asked to complete the annual assessment and evaluation, which compares projections with what actually occurred (see description of Section 8 below).

Key sections of the START tool include:

**Section 1:** Starting the START Process. This section helps centers create a mission statement for the center, determine benefits for stakeholders, determine community assets and resources, determine staffing resources, identify center users, and identify the interests and needs of users.

**Section 2.** Program Planning. This section of START helps centers select programs to be offered; develop targets for standard annual outcomes that can be measured and evaluated; develop customized goals, activities, and outcomes; and develop a program calendar.

**Section 3.** Marketing and Outreach. This section helps centers to develop an internal marketing plan that targets potential users of the center, develop an external marketing plan that targets potential partners and the larger community, create a narrowed list of potential partners that can help meet programming needs, and implement an action plan to reach those partners that can best help the center meet its goals.

**Section 4.** Organization and Management. This section helps centers to learn about management structure, including the roles of residents, advisory board/boards of directors and organizations designated as 501(c)(3); develop a timeframe for establishing an accounting infrastructure; develop a timeframe for creating personnel policies and procedures; and set goals, activities, and outcomes for the organization and management of the center.

**Section 5.** Planning for Center Operations. This section focuses on what is needed to open and run a center. The section answers questions about space requirements, equipment requirements, and security and accessibility issues, and provides sufficient information for the development of a center operations timeline.

**Section 6.** Budgeting and Fundraising. This section is focused on calculating the cost to start a center and developing operating budgets for the first three years. This section enables users to develop expense budgets for the center's start-up and operational budgets for years one, two, and three; review potential sources of funding and build a revenue budget for the Center's startup and operational budgets for years one, two, and three; and develop goals, activities, and outcomes for a fundraising plan for the center.

**Section 7.** Business Plan Reports. This section allows users to generate a business plan report that will be saved in the online tool and can be modified and updated at any time.

**Section 8.** Assessment and Evaluation. To encourage centers to update, modify, and assess their business plans on a yearly basis, START provides an online form for assessment and evaluation purposes. Each fiscal year, centers are encouraged to evaluate their actual programs, services, and expenses in relation to their projected programs, services, and expenses. START makes this easy by allowing users to view the center's business plan while they record the center's actual yield.

The START online business tool follows a logical format that allows users to build upon the information requested in previous sections.

The completed center business plan is submitted to the appropriate HUD Neighborhood Networks Coordinator using online methodology. The HUD Neighborhood Networks Coordinator is able to review the business plan and make comments, recommendations, and suggestions to the center. The HUD Neighborhood Networks Coordinator may accept the business plan, or based upon suggestions and recommendations send the business plan back to the center electronically and request that changes be made and the plan be re-submitted.

For the best quality business plan, centers are asked to respond to each data request within START. However, in the case of new centers, it is recognized that it is difficult to project some items. Centers are encouraged to

be realistic and make every effort to project. New centers base their responses entirely upon projection/speculation for the startup year, while existing centers can base their projections upon a previous year's outcomes.

In conjunction with updates to the business plan, centers are requested to update their Center Profiles as data collected by this tool becomes out of date.

Centers are not required to do directly input any information into the Classification tool for Levels 1 and 2. However, they may submit requests for Model status once they believe they have met its requirements. This process and data collection only happens once per center.

### ***Electronic Postcard Data Collection***

The postcard data collection will capture contact information from Neighborhood Networks centers. The proposed methodology is an email distribution with telephone follow-up. Center directors identified from the Neighborhood Networks center database will be contacted by e-mail approximately one week after OMB approval. The postcard e-mails and telephone follow-up interviews will be conducted annually on a quarterly basis.

### **3. *START, Classification and Center Profile Data Collections***

Several procedures have been implemented in an effort to increase online completion of business plans and the associated tools. For example, the Neighborhood Networks Statement of Work emphasizes strategies to increase response, including marketing on the Neighborhood Networks Web site, dedicated conference workshops and general sessions, and mentioning the online tools during technical assistance visits and conference calls. In addition, dedicated Technical Assistance Coordinators have been assigned to assist centers in using START and completing online Classification forms and Center Profiles.

The recent enhancements to START are also anticipated to result in an overall increase in response rate by providing automated email reminders to centers to complete their business plans and automated reminders to HUD Neighborhood Networks Coordinators to review submitted business plans.

The Center Profile data collection response rate is enhanced by providing a means for centers to easily access and update their center profiles while updating their START business plans and assessments.

Center Classification response rates are enhanced by automatic designation of Level 1 and Level 2 status, as well as e-mail reminders provided to HUD Neighborhood Networks Coordinators to review and approve applications for Level 3 status.

### ***Electronic Postcard Data Collection***

A mixed mode data collection approach (e-mail with telephone follow-up) will be used to achieve the highest possible response rate for this component of the data collection. The e-mail and telephone follow-up script will emphasize the importance of, and the benefits of completion. For instance, the data collection will be used to update HUD's *Neighborhood Networks Center Directory*. Besides being a resource for center representatives to learn about other centers, the directory is a reference document for partners and others to use when they need to locate recipients for their donations and contributions. In addition, the postcard data will help HUD to maintain an up-to-date profile of Neighborhood Networks centers, enabling them to receive important resources and announcements that are disseminated periodically throughout the year.

4. As indicated in Section A.8, the Neighborhood Networks team contacted six Neighborhood Networks centers by telephone to obtain an estimate of respondent burden in terms of the amount of time required to complete START, the Classification Tool and the Center Profile Tool. Calls were conducted with centers that have already completed business plans using START. In addition to collecting information regarding respondent burden, Centers were asked for opinions regarding the overall data collection process and the frequency of data collection.

The electronic postcard procedures were pretested with seven respondents who are representative of the population. The selected centers are geographically dispersed and represent a variety of housing developments and centers. The purpose of this pretest was to identify any item wording or ordering that was unclear to respondents and to determine if any key measures had been omitted from the postcard. The pretest also provided an estimate of respondent burden in terms of the amount of time required to complete the postcard and the extent to which questions could be answered without advance notice and/or records review. Thirdly, the Neighborhood Networks team was able to gauge the accessibility of Neighborhood Networks center directors, and determine the most effective means of reaching respondents (e-mail vs. telephone).

No testing of procedures beyond the pretest will be conducted.

5. The following individuals were consulted regarding the design of the enhanced START system and the associated data collections:
  - Anthony Cain, Neighborhood Networks Project Director, 301-519-5706
  - Stacey Jones-Speight, Senior Information Systems Manager, 301-519-5951
  - Peng Yan, Manager, Information Systems, 301-519-5850
  - Youqi Ma, Senior Programmer Analyst, 301-519-5824
  - Ling Chi, Systems Analyst, 301-519-5636
  - Sadie Bennett, Program Manager/Senior Research Analyst, 301-519-5066
  - Vickie Schachter, Program Development Manager, 301-519-5081