

Supporting Statement for Paperwork Reduction Act Submissions

Office Special Needs Assistance Programs Annual Progress Report (APR)

A. Justification

This request is for approval of a revision of a currently approved collection of information for reporting in Department of Housing and Urban Development's (HUD) competitive homeless assistance programs authorized by the McKinney-Veto Act, as amended. The information is reported yearly to HUD by grantees (state and local governments, public housing authorities, and nonprofit organizations) receiving funding from HUD under the Supportive Housing, Shelter Plus Care, and Section 8 Moderate Rehabilitation Single Room Occupancy programs. The collection covers annual reporting for each of the programs to reduce duplication and to simplify administration of annual reporting for the three supportive housing programs:

1. The following circumstances make the collection of information necessary:

The Annual Progress Report (APR) for HUD's competitive homeless programs provides information to HUD necessary for program monitoring and evaluation. The process of gathering and analyzing the information needed to complete the APR also assists local projects with their own program evaluation. The APR is the mechanism used by HUD Headquarters and Field Offices to review the performance of funding recipients on an annual basis. The reports permit HUD to understand what types of clients are being served in its homeless assistance programs and what the programs' success rate is in helping homeless families and individuals achieve residential stability and increase their skills and/or incomes. For the Supporting Housing and Shelter Plus Care programs, the APR also reports to HUD the amount of local match that has been provided to fulfill statutory and regulatory requirements.

The HUD-40118 APR is currently approved under OMB No. 2506-0145 with an expiration date of 08/31/06.

The regulatory authority to collect this information is contained in each program rule. For the Supportive Housing Program, the regulatory authority is contained in the 24 CFR 583.300(g) which states, "Each recipient of assistance under this part must keep any records and make any reports (including those pertaining to race, ethnicity, gender, and disability status data) that HUD may require in the time frame required." The Shelter Plus Care program rule contains the same statement at 24 CFR 582.300(d)(1). The Section 8 Single Room Occupancy rule contains a similar statement at 24 CFR 882.808(p).

2. The following is requested and used accordingly:

The APR has been used for ongoing program evaluation and monitoring. The Department has used the reports to monitor grant execution, and to evaluate the eligibility of the population being served and housed, as well as the supportive services offered to the participants. The APR helps identify how effective the grant has been in helping program participants achieve residential stability, greater self-determination, and increase skills or income. The information included in the annual report is organized in the following manner:

Part I: Annual Project Information

- a. Participant—information on characteristics, residential stability, and income of participants who received assistance during the operating year.
- b. Supportive Services - information on the amount of funding spend on services provided to participant during the operating year. Shelter Plus grantees also report on the local match of supportive services provided.
- c. Program Goals and Objectives—grantee describes progress in meeting the program goals and objectives that were originally established in the grant application. The grantee also revises or sets goals for the next year.

Part II: Supportive Housing Financials Exhibits—reports on the amount of local match provided by Supportive Housing program grantees.

3. The Office of Special Needs Assistance Programs (SNAPs) anticipates that submission of the Annual Progress Report (APR) will be electronic in 2008. The current procurement for the SNAPs Grants Management Information System includes upgrading the APR data entry system from a HUD-based model to a web-based model, which would allow grantees to complete and submit their APRs on-line via the Internet. Another future enhancement to the SNAPs Grants Management Information System will enable grantees to upload aggregate beneficiary data for the APR from the local Homeless Management Information System (HMIS), thereby eliminating duplicative data entry.
4. The APR was developed with the reduction of duplication in mind. Since 1994, reporting requirements for the three programs have been the same (apart from small variations due to statutory differences) so that recipients receiving funding from more than one program would only have to use one form so that HUD staff could more easily administer annual reporting requirements.
5. The wide range of funding recipients including States, local governments, public housing authorities, and nonprofit organizations, make it difficult to give special consideration to burden places on small entities by this collection of information. Efforts have been made to minimize the burden placed on all grantees, while at the same time ensuring that sufficient information is reported to HUD to evaluate, monitor and summarize program outcomes and activity.

6. The APR will be used for ongoing program evaluation and monitoring. Updated information is needed annually to fulfill these purposes. No other special circumstances exist for the collection of the requested information.
7. This information collection is being conducted in a manner consistent with the guidelines in 5 CFR 1320.6.
8. The APR is not being changed in this submission, except for clarification of reporting instructions. It was published in the Federal Register on April 24, 2006. No comments were received.
9. No payments or gift to respondents is allowed.
10. To the extent that any information is of a confidential nature, there will be compliance with Privacy Act requirements. However, the APR does not request the submission of such information. A worksheet is offered for collection of consistent client data but the worksheet is not submitted to HUD.
11. This information collection does not include any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.
12. The Following are estimates of the information collection's burden hours:

<u>Activity</u>	<u>Number of Respondents</u>	<u>Frequency of Responses</u>	<u>Responses Hours</u>	<u>Burden Hours</u>
Record-keeping	6,100	1 Annually	3	18,300
Report preparation	6,100	1 Annually	30	183,000
TOTAL			33	201,300

Respondent's Cost per Site

Record keeping (\$26 per hr. x 30 hrs.).....	\$780
Report preparation (\$26 per hr. x 3 hrs.).....	<u>\$78</u>
TOTAL	\$858

Total Respondent Cost

\$858 per site by 6,100 annual reports..... \$5,233,800

13. None

14. Estimate of the annualized cost to the Federal Government of this information collection are:

Federal Government Cost (clerical and professional staff time)

Review and evaluate (\$26 per hr. x 1 hr. x 6,100 reports)..... \$158,600

15. The number of burden hours for this information has decreased because the instructions have been more clearly defined; all grantees are not required to answer some of questions. While the number of grantees has increased, over 60 percent of the grantees are renewals and do not require as much time to complete. Only minor adjustments need to be made to the database for the renewals. A majority of the grantees have computerized systems with the information in a database and only need to make minor changes to the information already being collected to complete the APR for renewals.

16. There are no plans to publish the results of this collection of information for statistical use.

17. There are no plans to seek approval to not display the expiration date for OMB approval of the information collection.

18. No exceptions.

Annual Progress Report (APR)

5 CFR 1320.8(b)(3) information

- (3) (i) This information is being collected in order to provide information to Department of Housing and Urban Development (HUD) necessary for program monitoring and evaluation. The process of gathering and analyzing the information needed to complete the Annual Progress Report also assists local projects and their Continuums of Care with their own program evaluation.
- (ii) The Annual Progress Report has been used for ongoing program evaluation and monitoring. The Department has used reports to monitor grants execution, and to evaluate the eligibility of the population being served and housed, as well the supportive services offered to the participants.
- (iii) The information collection burden is placed at 30 hours for record keeping and 3 hours for report preparation, for a total of 33 hours. The public is instructed to direct to HUD any comments concerning the accuracy of this burden estimate and any suggestions for reducing the burden.
- (iv) The collection of this information is required to obtain or retain benefits as describe at 24CFR sections § 583.300(2)(g), § 582.300(d)(1), and § 882.808(p).
- (v) The reports do not reveal confidential information.
- (vi) This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.