

**Supporting Statement for Revisions to Existing
Housing Opportunities for Persons with AIDS (HOPWA) Program
Paperwork Collection Efforts**

Summary

The following submission updates HOPWA program forms OMB Number 2506-0133—the approval use date was extended to August 31, 2007. The proposed revisions pertain to forms: (1) HOPWA Competitive and Renewal of Permanent Supportive Housing Project Budget Summary (HUD-40110-B) (formally referred to as the Annual Notice of Funding Availability (NOFA) for competitive grant applicants; (2) Annual Progress Report (HUD-40110-C) for competitive grantees; and (3) Consolidated Annual Performance and Evaluation Report (HUD-40110-D) for formula grantees. OMB’s approval of these existing forms, dated December 16, 2005, provided for an eighteen month use period under the conditions that HUD evaluates the data to determine whether its quality and form are adequate to support the program goals or are in need of further refinement, and that page numbers are inserted on the forms.

During the public comment period ending July 30, 2007, HUD received 5 comments that addressed 73 items in HUD forms 40110-C, and D and included comments that the changes make the documents less complex and add clarity to instruction. The Office of HIV/AIDS Housing reviewed each of these comments and made related edits. These technical edits further improve clarity and consistency within the forms and in program-wide reporting elements, and streamlines some additional element allowing for a reduction in the APR by three pages. No new substantive element has been added as a result of these comments. HUD also further collaborated with HOPWA technical assistance providers that have been conducting training with grantees on the enhanced outcome reporting requirements. The consolidation of some data elements further reduced the length of the forms. These edits are expected to reduce reporting burden on grantee and improve accuracy and thereby reduce the need for corrections in verification efforts. No changes were made to the Application Project Budget Summary (HUD-40110-B), and no comments were received on this form. Some comments also noted the need to make related updating to the information technology system (IDIS) use for reporting which will be addressed by the Department with issuance of the revised forms.

As part of this data quality evaluation effort, from the prior submission, HUD collaborated with various HOPWA stakeholders, consisting of formula and competitive grantees, as well as technical assistance providers, to review HUD forms 40110-B, C, and D to determine the quality of the reporting data and how this reporting enables the Department to determine and assess grantee progress in implementing the housing stability performance outcome measure. The collection of edits and technical corrections proposed for the APR and CAPER were developed through extensive consultations with grantees and technical assistance providers, some of which occurred at a series of 38 regional trainings [for 693 grantees and project sponsors] and HOPWA’s National Grantee Training in February 2007. In addition, this effort provided an opportunity to reassess the level of reporting burden these forms place upon grantees. Both the Annual Progress Report (HUD-40110-C) and the Consolidated Annual Performance and Evaluation Report (HUD-40110-D) were examined to identify areas grantees and project sponsors identified as complicated or confusing, with the goal of refining these sections of the forms to facilitate a more accurate reporting process. Similarly, the Project Budget Summary (HUD-40110-B) for competitive grant applicants has been revised to clarify budget elements which will improve clarity and provide greater understanding to the information submitted. Each form has been modified in order to comply with federal requirements of the Transparency Act of 2006 (Public Law 109-282) and with HUD’s e-grants initiative. Additionally, page numbers have been inserted on all forms.

HUD has been conscientious of improving the level of coherent and unambiguous terminology, along with reducing any unnecessary and duplicative areas of the forms. The Department has balanced these needed changes with preserving much of the content and design of the current APR, CAPER and Project Budget Summary , so as to allow

grantees to continue using many of their current data collection systems, in an effort to minimize confusion and reduce the reporting burden program-wide.

A. Justification

HOPWA Competitive and Renewal of Permanent Supportive Housing Project Budget Summary (HUD-40110-B) – formerly identified as Annual Notice of Funding Availability (NOFA) for competitive grant applicants

- 1a. No changes were made to the Application descriptive project budget summary, since publication the Federal Register in May 29, 2007. The revisions to date clarify the grouping of the eligible activities against key program activities (as identified in columns A and B of each of the forms), were retained. For example, Supportive Services is identified as a separate activity while the existing form classifies this activity under Other Program Expenses. Other Housing Costs is identified under Other Program Expenses while the existing form classifies this activity under Facility Operations. In addition, Resource Identification is a new activity included under the Other Program Expenses category. A new element referencing client confidentiality has been incorporated into the HOPWA Applicant Certification. The Department is implementing the requirements of the Transparency Act of 2006 which requires the submission of an Employer Identification Number or Tax Identification Number for each grantee, project sponsor, and any other organization that receives over \$25,000 in federal assistance. Overall, the modest revisions to the budget summary will ensure that grant applicants present the requested budget information in a more succinct manner according to key programmatic activities.

Annual Progress Report (HUD-40110-C) for competitive grantees, and the Consolidated Annual Performance and Evaluation Report (HUD-40110-D) for formula grantees

This section consolidates the summarized changes made within both the APR and the CAPER, since similar revisions were made to both forms. The only exception is the Certification of Continued Usage , which has been added as a new element to the CAPER only.

- 1b. The Department proposes minor revisions and technical edits to the performance reporting format for competitive grantees in the Annual Progress Report (HUD-40110-C), and for formula grantees in the Consolidated Annual Performance and Evaluation Report (HUD-40110-D), in order to improve the usability of these forms for grantees, thus leading to more accurate reporting of performance output and outcome data. The revisions include formatting changes designed to improve presentation and clarity of performance indicators.

The APR and the CAPER are used by HOPWA grantees to provide annual performance reporting of their programmatic accomplishments in addressing the permanent supportive housing needs of low-income persons and their families living with HIV/AIDS. These reports also inform the public and allow HUD to assess grantees' past performance and help direct future efforts toward achieving HOPWA goals. Data collected through the APR and CAPER supplements information collected through the Integrated Disbursement Information System (IDIS), which currently lacks the capacity to collect outcome data on clients' access to care and reduced risks of homelessness.

In FY2006, the HOPWA program, per OMB's PART recommendation, successfully implemented a new long-term performance measure for client outcomes, which assesses programs' success in maintaining housing stability, reducing the risk of homelessness, and improving access to care for HOPWA clients. The initial data submitted through the APR and CAPER under this measure has indicated that grantees show significant success in increasing clients' housing stability. Specifically, data reported for Tenant-Based Rental Assistance and Facility-Based Housing Assistance was especially strong; however, data reported for Short-Term Rent, Mortgage and Utility Assistance and Access to Care evidences deficiencies while not demonstrating the expected client outcomes.

In order to ensure that performance data is collected on all client outcomes, HUD has conducted a thorough analysis of the current APR and CAPER forms, reviewed and assessed all comments submitted, and carefully examined each section for strengths and possible refinements. As aforementioned, HUD also worked collaboratively with grantees, project sponsors and technical assistance providers through multiple regional trainings, as well as the 2007 National HOPWA Grantee Training, to collect HOPWA stakeholder input on the current forms, as well as the proposed revisions. Grantee feedback confirmed HUD's assessment of the forms: weak data was submitted in areas of the APR and CAPER that contained unclear questions and confusing formatting. Subsequent comments received during the public comment period, provided valuable input to clarify these areas.

As a result of this collaborative effort and public comments, HUD has worked to revise the reporting forms in a way that reflects program needs as well as grantee concerns. Key areas modified in the first submission include the following:

- *Access to Care*, reformatted and streamlined to reduce redundancies;
- *General Grantee/Project Sponsor/Organization*, modified per requirements of the Transparency Act 2006 (P.L. 109-282);
- *Leveraging*, streamlined to consolidate data elements from 16 to 6;
- *Permanent and Transitional/Short-Term Facility-Based Housing Assistance*, revised and reformatted so that performance data is now reported separately for permanent housing facilities and transitional/short-term facilities for more accurate assessments; and
- *Short-Term Rent, Mortgage and Utility Assistance (STRMU)*, updated to reflect recent program guidance under CPD Notice 06-07, *Standards for HOPWA Short-Term Rent, Mortgage and Utility (STRMU) Payments and Connections to Permanent Housing*.

In addition to the edits listed above, two new sections have been developed for inclusion in the forms:

- *Unmet Need*, added to the APR and CAPER as an update to information submitted to HUD by formula grantees every five years and as a way to begin assessment in non-formula funded areas through the competitive grantees completion of this section; and
- *Certification of Continued Usage*, added to the CAPER at the request of formula grantees so that they may identify facilities as Stewardship Units if HOPWA funds were spent on development, acquisition, or rehabilitation.

The above modifications were retained, with the following formatting and technical edits in response to HUD's review and assessment of the public comments submitted, per Federal Register Notice dated May 29th, 2007:

- *Access to Care*, reformatted to clarify indicators for case management, and other related support;
- *Grantee Narrative*, reformatted to improve consistency;
- *General Grantee/Project Sponsor/Subrecipient*, modified to clarify terms (replaced organization with subrecipients);
- *Leveraging*, reformatted to accommodate reporting for In-kind contributions.
- *Permanent and Transitional/Short-Term Facility-Based Housing Assistance*, reformatted and clarified to include information on master leased units, and consolidated to streamline reporting for Permanent and Transitional/Short-Term Facilities into the same chart.
- *Resource Identification/Technical Assistance*, revised and reformatted so that performance data for Resource Identification and Technical Assistance is reported separately for more accurate assessments.
- *Supportive Services*, reformatted and streamlined to reduce redundancy, and capture performance information by sponsor for supportive services provided with HOPWA housing assistance, and by sponsor if the supportive services are provided with Housing arrangements coming from other sources
- *Short-Term Rent, Mortgage and Utility Assistance (STRMU)*, reformatted and streamlined to better differentiate data input fields, and consolidate Housing Plan indicator into Access to Care Outcome section.

- *Unmet Need*, reformatted to clarify reporting for competitive grantees

In creating these edits, the Department has worked to avoid all unnecessary duplication by eliminating redundant elements and streamlining dense portions of the APR and CAPER forms. Overall, public comments and grantee feedback on proposed revisions has been positive and has indicated that the updated forms will likely be less burdensome and clearer for grantees to complete. Directions and formatting were updated to reflect form changes and address comments; and language within the APR and CAPER was edited to ensure consistency and clarity. Where possible, both terms and data elements from other reporting documents likely to be used by HOPWA grantees (e.g., HUD Special Needs Assistance Program and HHS Ryan White Care annual reports) were incorporated into the APR and CAPER, transferring grantees' existing familiarity with performance reporting to HOPWA through standardization.

The proposed revisions to both the APR and the CAPER are further clarified as follows.

I. ACCESS TO CARE, Part 4, Section 3 of APR and CAPER:

The proposed Access to Care section consolidates 12 data elements to six with the intention of reducing grantee and project sponsor time burdens by streamlining reporting on client outcome measures. The revisions were designed around grantee feedback, and subsequent public comments on the current format of Access to Care, as well as data already submitted in the APR and CAPER, which revealed that the section was confusing and complicated. Changes will ensure that data is more reflective of HOPWA beneficiaries' increased access to care and support through their involvement with the program. Client household income has also been reportedly difficult to collect and is being used primarily to indicate providers of clients' eligibility for benefits, such as Social Security Income. Consequently, this section within Access to Care was replaced by a yearly measure of clients' access or qualification for sources of income, including both earned income and other benefits. Clarification on what qualifies as an income source, as well as a source of medical insurance and/or assistance, has been included in the form, under both types of Access to Care, through a bulleted list of eligible items, derived from Continuum of Care, Homeless Management Information System (HMIS) and Ryan White guidance. These other programs, frequently accessed by HOPWA grantees, have been used as references throughout the development of the revised Access to Care section.

II. GENERAL GRANTEE/PROJECT SPONSOR/SUB-RECIPIENT, Part 1 of APR and CAPER:

Per the requirements of the Transparency Act, minor revisions were made to collect general information about grantee service areas, congressional districts, unique identifying information and information about organizations with HOPWA contracts of \$25,000 or more. The Sub-recipient was adopted to clarify the contractor and sub-contractor – generic terms grantees use to describe organization with HOPWA contracts.

III. GRANTEE NARRATIVE, Part 1 of APR and CAPER:

Additional categories were included under the Barriers and Recommendations sections, to address public comments, and enable grantees to more accurately categorize their assessments. These now include: Credit History; Rental History; Criminal Justice History; Housing Affordability; and Other.

The CAPER narrative was streamlined and reformatted. Six questions were consolidated to four that are similar to assessments made in APR reporting, and categorized as follows: assessments on outputs reported; outcomes assessed including actions to meet benchmarks, as needed; coordination with other resources; and need for any technical assistance. These categories better differentiate performance questions, and will eliminate redundancy.

IV. LEVERAGING, Part 2 of CAPER, Part 3B of APR:

These changes reduce redundancies evident in the current version through clarification and consolidation of fields resulting in the removal of 16 data elements. These revisions are consistent with HUD's Continuum of Care performance reporting form that will facilitate calculation of leveraging from Ryan White and Continuum of Care programs by prioritizing housing assistance and information on sources of leveraging. Grantees will report sources of leveraging for housing assistance and supportive services, as well as the total households assisted with leveraged funds by type of housing assistance. These changes incorporate feedback from grantees, HUD field staff, and national technical assistance providers which was obtained at HOPWA's national grantee training. In reviews public comments, allowance for reporting on In-Kind resources was included.

V. PERMANENT AND TRANSITIONAL/SHORT-TERM FACILITY-BASED ASSISTANCE, Part 3 and Part 4, Section 1 of APR and CAPER:

Separate reporting for Permanent and Transitional/Short-Term Assistance will improve the accuracy of performance measurement reporting while enabling grantees and project sponsors to precisely connect HOPWA performance measures [improved housing stability, improved access to care and reduced risk of homelessness] to their respective permanent and transitional/short-term housing assistance. This change facilitates the development of more precise benchmarks and targets for facility-based projects. Different from permanent housing assistance, improved housing stability for transitional/short-term assistance is often evidenced by high rates of out-placement to permanent housing. An additional change is that an assessment on the success of placing client households to permanent housing within 24 months has been included.

VI. RESOURCE IDENTIFICATION/TECHNICAL ASSISTANCE, Part 3, Section C of APR and CAPER

Separate reporting for Resource Identification and Technical Assistance, based on HUD's assessment of public comments and feedback from the technical assistance providers, will improve performance measurement reporting, and enable HUD to assess these efforts effectively.

VII. SHORT-TERM HOUSING ASSISTANCE, Part 4, Section 2 of APR and CAPER:

Short-Term Housing Assistance has been reformatted to emphasize the associated performance outcome measure—reduced risk of homelessness—and to improve the accuracy of data reporting. The two additional fields clarify a temporary fix to STRMU reporting efforts: a technical note was issued asking grantees to report clients' housing as "temporary" if there was a reasonable expectation that additional STRMU assistance would be needed, and CPD Notice 06-07, *Standards for HOPWA Short-term Rent, Mortgage, and Utility (STRMU) Payments and Connections to Permanent Housing* contains guidance on the need for ongoing client assessments. Form revisions also reflect feedback obtained from grantees, technical assistance providers and field staff. Incorporating both the guidance and feedback on the current Short-Term section of the APR and CAPER, the revised forms will enable more precise reporting of client housing status, allowing for better assessment of reduced risk of homelessness for client households assisted. The chart has been reformatted and categories' descriptions were revised to better illustrate the result of the housing status assessment, more consistent with Continuum of Care and Supportive Housing Program. In addition, "Temporary Housing" was separated into arrangements that provide temporary stability versus those that reduce imminent risk of homelessness. Finally, per public comments a data field for the number of client households that had a housing plan was removed.

VIII. SUPPORTIVE SERVICES, Part 3, Section C, and Part 5, Sections B, C, and D of APR, and Part 3, Section 2 in the CAPER:

Reporting for Supportive Services provided with HOPWA Housing Assistance and Supportive Services provided with Housing from Other Sources was separated to improve the accuracy of performance measurement reporting and enable grantees to precisely connect HOPWA performance measures. Consequently, instructions and format for reporting Supportive Services were clarified and consolidated, and will enable grantees to more precisely document their performance accomplishments; and streamline reporting for Supportive Services.

VI UNMET NEED, Part 1D of CAPER, Part 2F of APR:

The Unmet Need charts represent a new addition to the CAPER and APR, which would allow the Department to assess municipality and state need for supplementary HOPWA formula and competitive funding. As part of the Consolidated Planning process and through the Consolidated Planning Management Process (CPMP) tool, formula grantees already calculate the level of housing-related need for persons living with HIV/AIDS in their communities; current levels of assistance being provided to this population; and the level of need unable to be filled. This information can be used directly to complete the CAPER Unmet Need worksheet, but grantees will also have the option of updating Unmet Need data for the CAPER through the use of several suggested sources, such as community provider waiting lists or information from Ryan White Planning Councils. Similarly, as part of their grant application process, competitive applicants are also asked to evaluate and estimate the level of unmet need by housing activity type in their communities. This information can be inserted directly into the APR by competitive grantees, or may be updated using the sources listed above as well as other appropriate resources. Grantees will also be asked to estimate which portion of the community's Unmet Need is comprised by those needing long-term, short-term, or transitional housing assistance. HUD will be able to use this information to better understand how the HOPWA program is being used in different areas, which may inform the Department of a potential need for program changes.

The following proposed revision applies to the CAPER only.

CERTIFICATION OF CONTINUED USAGE, Part 5 of CAPER:

Already included in the APR, the Certification of Continued Usage was added to the CAPER based on feedback from formula grantees. The Certification applies only if HOPWA funds were used for Acquisition, Rehabilitation or Development of a Facility. As with competitive grantees, this certification will enable the HOPWA program to report on the CPD performance measures.

2. The information to be collected in the Project Budget Summary will be used to rate competitive and renewal grant applications to determine eligibility for HOPWA competitive grants, to establish grant amounts, and to ensure that technical requirements are met prior to execution of a grant agreement. The budget form requirements will allow HUD to determine if a project is financially feasible and whether all proposed activities are eligible.

The information to be collected in the APR and CAPER forms will be used to measure project success against planned and actual accomplishments. Also, these reports will provide HUD with essential information on project output and outcome activities that is used in reporting to Congress, as well as in the monitoring the use of federal funds and ensuring statutory and regulatory compliance. This information may be used for public dissemination.

The HOPWA APR and CAPER reports are used by competitively selected grantees, and formula grantees, respectively, to provide annual performance information on program accomplishments in meeting the program's performance outcome measure. The respondents are HOPWA 122 formula grantees, participating EMSAs, and balance of state areas, and 85 competitive grantees, usually non-profits.

3. The competitive application is available online in its entirety via grants.gov, including the budget form.

Considerable effort have been undertaken to pursue automation and the use of electronic reporting through the Integrated Disbursement and Information System (IDIS) HOPWA module, including the use of form fillable reporting, to reduce the reporting burden for grantees.

The Department is continuing its efforts to improve the use of computer systems and software so that it may increase public access to information posted on the internet. Also, the Department is considering alternatives on enhanced use of information technologies to reduce unnecessary paperwork submission.

4. To avoid duplication of information, all these forms have been streamlined and consolidated to reduce the reporting burden and to clarify areas that grantees identified as confusing. The budget section of the competitive application is arranged by activity type, so activity descriptions and budgetary information are not duplicated. However, up-to-date information is required for grant reviews, and selection, similar information used in the previous and information available from other HUD programs cannot be used for this purpose.

All proposed revisions to be included in the APR and CAPER represent areas in which grantees already collect information. Feedback from grantees and technical assistance providers indicated that grantees will not need to modify their data collection systems to report on the elements within the revised APR and CAPER. The information to be collected is not yet available from IDIS reporting or from other existing and available data sources. Formula grantees do currently report on the overall unmet housing need for persons living with HIV/AIDS via the Consolidated Plan. However, this occurs every five years and annual updates are not required. The inclusion of an Unmet Need worksheet within the CAPER would allow formula grantees to update data assessed for the Consolidated Planning process, and provide a breakdown of unmet need by type of housing assistance, not collected in any other data source.

5. The information collection does not adversely impact small businesses or other entities, states, units of local government, and non-profit organizations are eligible grant applicants only. Efforts were made to minimize the burden on all grantees, while ensuring that sufficient information would be provided to allow HUD to assess grantee applications and performance.
6. All information collected within the competitive grant application is used to carefully consider applications for funding. If HUD collected less information or less frequently, the Department could not determine the eligibility of applicants for grant funds.

APR and CAPER performance reports are collected and analyzed on an annual basis and this information is used to assess grantee performance and prepare budget justifications and to report to Congress on program activities and performance measure accomplishments. Less frequent submission of information on program accomplishments could compromise the legal, efficient, and effective implementation and overall management of the program. In addition to the limited IDIS reporting, these annual performance reports are the foundation of the program's ability to report on specific program accomplishments. These reports are available on the redesigned HOPWA program website for use by HUD field offices, grantees, and the general public. Furthermore, these performance reports benefit the government's effort to measure accountability and evaluate program effectiveness. The APR and CAPER assist grantees in reporting program accomplishments to local elected officials and the general public at large while also serving as a valuable information collection tool for complying with citizen participation requirements.

7. These circumstances are not applicable to the HOPWA program.

8. HUD will publish a notice in the *Federal Register* in May 29, 2007 to solicit public comment on this request for approval of the revised information collection.

Overall, the all five comments received expressed approval for the revisions, noting the form was less complex and the instructions in each part of the form were more clear and specific. After reviewing these comments HUD determined minor technical edits would benefit respondents. Comments favored the consolidation of reporting for leveraging, by housing assistance and services; and inclusion of an assessment for unmet need in the overview section. In general the comments helped HUD refine the existing technical edits, and further clarify the format of the reporting form. Some of the comments requested formatting changes to STRMU, Access to Care, and Supportive Services that improved the format and clarity of the reporting form. Comments also requested that information technology reporting on HOPWA (involving IDIS) also be updated and that action is planned following issuance of final reporting forms. HUD collaborated with various HOPWA stakeholders, consisting of formula and competitive grantees, as well as technical assistance providers, to review and draft the needed revisions following the issuance of new reporting tools in January, 2006. OMB specifically requested that HUD review the use of those new tools during the first 18 months of usage and made edits, as needed. The edits contained in this submission reflect HUD proposed technical edits based on its review, and public comments received.

The Department solicited input and recommendations from grantees and regional technical assistance providers through regional trainings. The proposed changes were developed in tandem with grantees and technical assistance providers, and presented to 250 formula and competitive grantee representatives at the 2007 National Grantee Training, conducted in Washington, DC, in February, 2007. Grantees and technical assistance providers have played an active role in the development of form changes. These proposed revisions to the APR and CAPER will be supplemented with technical assistance and training.

9. These circumstances are not applicable to the HOPWA program, since HUD does not provide payment.
10. Section 574.440 provides for the statutory requirements that grantees and their respective project sponsors maintain the confidentiality and identities of HOPWA program participants and that sufficient processes are in place to ensure sound confidential recordkeeping. The regulation is based on Section 856(e) of the AHOA, 42 U.S.C. 12905, and the competitive application has been updated to include client confidentiality requirements, under the applicant certification section. Additionally, data elements are included as part of the IDIS and HIMS reporting systems to denote confidentiality of specific addresses.
11. No questions of a sensitive matter are included as part of the requested or required submission of these reporting and application submission requirements. .

12. Hour and Cost Burden Estimates to the Grant Recipients

The information cited below is based upon the Department's experiences in administering the HOPWA program and providing grants management oversight, including previously established estimates of hour burdens in preparing an annual performance report of accomplishments. In order to account for the burden hours the new APR and CAPER would require, HUD contacted grantees and field staff who have been a part of the revision process for time estimates.

Description of Information Collection (Annual Reports)	Number of Respondents	Responses per Year	Total Annual Responses	Hrs per Response	Total Hours
40110-B SuperNOFA Competitive Application	40	1	40	22	880
40110-C Annual Progress Report (APR)	85	1	85	69	5,865
40110-D Consolidated Annual Performance and Evaluation Report (CAPER)	122	1	122	46	5,612
Recordkeeping	247	1	247	68	16,796
Grant amendments and extensions	20	1	20	20	400
Uniform relocation act appeals process	5	1	5	2	10
Environmental review recordkeeping	20	1	20	20	400
Miscellaneous other reporting	40	1	40	6	240
Total of grantee annual reporting burden:	247	1	247		30,203

Hourly cost estimate of \$23 x 30,203 hours = \$694,669

Each grant recipient is required one response per submission. Currently, all grant applications are submitted electronically. Currently, two-thirds of HOPWA grantees use the PDF form-fillable reporting for submitting their performance report while one-third prepare a manual submission. The number of respondents decreased from 267 to 247, because the competitive grants are renewed via Notice rather than application, requiring less grantees submissions.

13. There are no known additional costs to respondents.

14. Hour and Cost Burden Estimates to the Federal Government

The Department's annual estimate for evaluating grantee performance and assessment of client outcomes:

Type of Collection	Number of Respondents	Hours per Response	Total Annual Hrs	Hourly Rate	Estimated Cost (\$)
Review of Project Budget Summary	40	12	480	40	19,200
Grant selection and award/technical submissions and grant agreements	30	16	480	40	19,200
Review and analysis of APR and CAPER performance reports	85/122	16/14	1,360/1,708	40	54,400/68,320
Submitted amendments	10	8	80	40	3,200
Website posting of grantee performance results and	207	8	1,656	40	66,240

accomplishment summaries					
Uniform relocation act appeals	5	2	10	40	400
Environmental review recordkeeping	20	20	400	40	16,000
Total of projected administrative costs:	519		6,174	40	\$246,960

Hourly estimate of \$40 x 6,174 hours = \$246,960

15. These estimates include the burden hour revisions to the Project Budget Summary and the APR and CAPER performance reports. The overall burden hours for the Project Budget Summary were reduced to reflect a reduction to the total number of applications received but the burden hour to the applicant is increased by two hours to reflect the Transparency Act submission requirement. The proposed revisions to the APR and CAPER were presented to a group of both formula and competitive grantees, who had all been a part of the development process for the revised APR and CAPER forms, so that grantees themselves could estimate the shift in burden hours. The grantees first noted unanimously that the original burden hours reported to OMB within the previous justification were underestimated (36 hours for the CAPER and 85 hours for the APR) and needed to be increased, in order to accurately reflect the amount of time that grantees utilize to complete the APR and CAPER. The same grantees also submitted that the changes included within this justification to the reporting forms are not substantial, and are likely to improve the readability and general understanding of the APR and CAPER. Grantees estimated that the burden hours needed to complete the APR would decrease to 70 hours, due much in part to consolidations within the Leveraging and Access to Care sections of the form. The estimated hours required to complete the CAPER were increased to 45 hours as a result of the Transparency Act’s requirement to list all project sponsors and related information, as well as the need to possibly research and update Unmet Need data that was originally reported in the Consolidated Plan.

~~It is projected that proposed revisions will slightly increase the overall burden requirement as noted below:~~

Existing Burden Hours	30,946
<u>Revised Burden Hours</u>	<u>30,203</u>
Net Change:	-743
Adjustment: Decrease	743

16. The Department analyzes grantee performance and accomplishment data on an annual basis and responds to congressional and budget inquiries for specific reporting of program accomplishments.

17. No approval is sought to not display the expiration date for OMB approval of the information collection.

18. No exception to the certification statement.

B. Collections of Information Employing Statistical Methods

The HOPWA program does not use statistical methods.