



## 19. Certification for Paperwork Reduction Act Submissions

On behalf of this Federal Agency, 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). Appear 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;
- (a) 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);
- (b) It uses effective and efficient statistical survey methodology; and
- (c) 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.

Signature of Program Official:

Date:

X  
Michael E. Winiaraski, Deputy Director, Organizational Policy, Planning and Analysis Division, HROA

Signature of Senior Official or Designee:

Date:

X  
Lillian Deitzer, Departmental Reports Management Officer  
Office of Investment Strategies, Policy, and Management, Office of the Chief Information Officer

# Multifamily Housing Service Coordinator Program

OMB Control Number: 2502-0485

(HUD-91180-A, HUD-90006, HUD90198, SF-269-A, HUD-91178-A)

## A. Justification

This request seeks reinstatement for the Congregate Housing Services Program (CHSP). This package seeks approval for the same information collection and reporting requirements listed in the last approved package and reinstatement of a previously approved form, Annual Summary Budget (HUD-91178-A). This form is optional for grantees to use, but would be part of the annual extension request package. Burden hours and dollar amounts will decrease slightly, due to a lower number of grant recipients. No information collection is currently being collected.

1. The information is basic to the ongoing operations of the Congregate Housing Services Program (CHSP). It supports statutory requirements and program and management controls that prevent fraud, waste, and mismanagement. The controls must be maintained as long as current grants are in operation. Section 802(i)(1)(A) and (d)(7) of the National Affordable Housing Act authorizes/requires matching funds and participant fee collections that are reported on the Summary Budget form (HUD-91180-A) and the Annual Program Budget (HUD-91178-A). The CHSP rule at 24 CFR 700.155(d) requires grantees to submit those forms required by the Secretary, which are included in the CHSP Handbook 4640.1.

The collection of information is necessary to ensure efficient and proper use of funds for eligible activities. Without this information, HUD staff would not be able to assess need for funds and effectively monitor grantee's program administration. In addition, the information collection will assist applicants in better determining their need for funds and will enable grantees to more effectively account for funds and maintain appropriate program records.

2. Field Office Government Technical Representatives (GTRs) use the annual Summary Budget form (HUD-91180-A) and the Annual Program Budget form (HUD-91178-A) to assure that grant funds are being used properly. This includes grantees' expense of appropriate grant moneys during each annual grant period; use of grant funds to provide eligible activities to eligible residents, and to assure that statutory and regulatory requirements are being met.

HUD Field staff will review semi-annual Financial Status Reports, SF-269, in order to monitor the proper use of grant funds. The Field staff will then use the report to evaluate funds expenditure both during program activity and in cumulative form at program conclusion. If the staff find that funds have been improperly used, they may impose sanctions including funds recapture or repayment. If reports indicate poor accounting practices, the staff will work with the Grantee to improve accounting procedures according to appropriate OMB Circulars and Government Accounting Office (GAO) standards.

HUD Field staff will also review the LOCCS Payment Voucher (HUD-90198) in order to monitor use of funds on eligible activities. Grantees submit these forms on a quarterly basis. This allows the Field staff to track expenses and draw-down of funds for eligible activities at intervals within the grant term. These funds are taken as reimbursements and are obtained through use of a telephone voice response system. Grantees normally submit this form following their call to and receipt of funds from the voice response system. If this form indicates unusual, delinquent, or improper use of funds, the staff can block the Grantee from obtaining future grant funds until such problems are corrected.

HUD Field staff will review the Annual Report, (HUD-90006), to evaluate the effectiveness and efficacy of grant-funded activities. The staff will compare budgets with realized results. If Performance Reports indicate poor administration of funds or activities, funds spend on ineligible activities, or failure to comply

with terms and conditions of the Grant Agreement, the Field staff may take enforcement action. Such action may require sanctions including recapturing funds or levying other administrative or legal penalties.

Headquarters program staff use Annual Reports to compile annual program data for internal and external reports when requested.

3. Grantees currently provide all submissions using hard paper copies. Grantees would be permitted to make PDF files of their completed documents and e-mail them to the field office staff, if the grantee chooses to do so.
4. This information is not available through any other source and so must be collected.
5. This collection will not have a significant economic impact on small businesses or entities.
6. If information collection is not conducted as required, the Department will not be able to monitor proper use of grant funds according to statutory, regulatory, and administrative requirements, thereby losing the ability to most expediently prevent fraud, waste, and mismanagement. Grantees are required by law to provide a percentage of matching funds and to collect a percentage of program costs from participant fees. Less than annual information collection would deter Field office staff from assuring that grantees meet these annual requirements. In addition, less frequent reporting will not allow grantees to meet minimum grant reporting requirements of OMB circulars.
7. None.
8. Staff has discussed reporting requirements with at least three existing grantees to solicit their comments on the requested information collection. Notice was published in the Federal Register soliciting comments on January 28, 2008, Vol. 73, No. 18, pages 4890 – 4891. There were no comments received.
9. None
10. Since confidential information is not reported as part of the CHSP, no assurance of confidentiality is needed.
11. No questions of a sensitive nature are part of the CHSP.
- 12.

Estimated Number of Respondents, Responses, and Burden Hours Per Annum					
	Respondents	Responses per Annum	Total Responses	Burden Hours	Total Hours
Annual Grant Extension Request package (includes forms HUD-91180-A & HUD91178-A)	63	1	63	5.5	346.5
Annual Report (HUD-90006)	63	1	63	4	252
LOCCS Payment Voucher (HUD-90198)	63	4	252	1	252
Financial Status Report, SF-269	63	2	126	2	252

Total	63	8	504	12.5	1,102.5
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The estimated number of burden hours are based on discussions with HUD Field staff and current CHSP grantees.

Estimates of Annualized Cost to Respondents			
	# Hours	Cost per Hour*	Total Cost
Annual Grant Extension Request package (includes forms HUD-91180-A & HUD91178-A)	346.5	\$21.63	\$7,495
Annual Report (HUD90006)	252	\$21.63	\$5,451
LOCCS Payment Voucher (90198)	252	\$21.63	\$5,451
Financial Status Report, SF-269	252	\$21.63	\$5,451
Total	787.5	\$21.63	\$23,034

\* The hourly cost is based on an average annual salary of \$45,000.

13. The estimate of the total annual cost burden to respondents does not vary from the numbers presented in item #12. There is no capital and start-up cost component in the Service Coordinator program.

14.

Estimates of annualized cost to the Federal government					
	Responses	Hours per Response	Total Hours	Cost per Hour*	Total Cost
Annual Grant Extension Request package (includes forms HUD-91180-A & HUD91178-A)	63	3	189	\$35.19	\$6,651
Annual Report (HUD-90006)	63	1	63	\$35.19	\$2,217
LOCCS Payment Voucher (HUD-90198)	252	0.5	126	\$35.19	\$4,434
Financial Status Report, SF-269	126	0.75	94.5	\$35.19	\$3,325
Total	504	5	473	\$35.19	\$16,627

\* Based on an average annual salary of \$73,194.

15. Upon reinstatement, there will be 63 active grants, 12 less than the 75 in 2004. This is due to closing of several programs and consolidation of grants by grantees who had multiple grants.

The number of hours required for HUD staff to review annual extension requests and annual performance reports will decrease by one hour each. This reduces the overall hours needed to review program documents and also reduces the total cost to the federal government. The hourly rate increases from \$28.00 to \$35.19, as this is a better reflection of salaries for field staff who review grant documents.

We are seeking OMB's approval for the use of form, Annual Summary Budget (HUD-91178-A), so we can provide grantees with an electronic copy of the file on the HUDclips Org website.

16. HUD does not plan to publish the results at this time.

17. Not seeking such approval.

18. No exceptions requested.

**B. Collections of Information Employing Statistical Methods**

None