

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.

<p>1. Agency/Sub-agency Originating Request: U.S. Department of Housing and Urban Development Office of Housing, Office of Housing Assistance Contract Administration Oversight, Neighborhood Networks Staff</p>	<p>2. OMB Control Number: a. 2502-0553 b. None</p>																																		
<p>3. Type of information collection: (check one)</p> <p>a. <input type="checkbox"/> New Collection</p> <p>b. <input checked="" type="checkbox"/> Revision of a currently approved collection</p> <p>c. <input type="checkbox"/> Extension of a currently approved collection</p> <p>d. <input type="checkbox"/> Reinstatement, without change, of previously approved collection for which approval has expired</p> <p>e. <input type="checkbox"/> Reinstatement, with change, of previously approved collection for which approval has expired</p> <p>f. <input type="checkbox"/> Existing collection in use without an OMB control number</p> <p>For b-f, note item A2 of Supporting Statement instructions.</p>	<p>4. Type of review requested: (check one)</p> <p>a. <input checked="" type="checkbox"/> Regular</p> <p>b. <input type="checkbox"/> Emergency - Approval requested by</p> <p>c. <input type="checkbox"/> Delegated</p> <p>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</p> <p>6. Requested expiration date: a. <input checked="" type="checkbox"/> Three years from approval date b. <input type="checkbox"/> Other (specify)</p>																																		
<p>7. Title: Neighborhood Networks Management and Tracking Data Collection Instruments</p>																																			
<p>8. Agency form number(s): (if applicable) None</p>																																			
<p>9. Keywords: Housing, Computer Technology, Centers, Neighborhood Networks, Multifamily, Technological Advancement, Classification, START, Center Profile, Center Contact, Computer Learning, Community Learning, Technology Center</p>																																			
<p>10. Abstract: HUD's Office of Multifamily Housing Programs is requesting clearance for a revision of a current data collection designed to capture information from the Neighborhood Networks center paper and START business plans. The revision includes enhancements to the format of the online Strategic Tracking and Reporting Tool (START), collection of related data from an online Classification Tool, and contact verification information from an electronic postcard data collection. The data collection will assist HUD in obtaining up-to-date information regarding Neighborhood Networks centers.</p>																																			
<p>11. Affected public: (mark primary with "P" and all others that apply with "X")</p> <p>a. Individuals or households e. Farms</p> <p>b. X Business or other for-profit f. X Federal Government</p> <p>c. P Not-for-profit institutions g. State, Local or Tribal Government</p>	<p>12. Obligation to respond: (mark primary with "P" and all others that apply with "X")</p> <p>a. X Voluntary</p> <p>b. P Required to obtain or retain benefits</p> <p>c. Mandatory</p>																																		
<p>13. Annual reporting and recordkeeping hour burden:</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">a. Number of respondents</td> <td style="text-align: right;">738</td> </tr> <tr> <td>b. Total annual responses</td> <td style="text-align: right;">1,338</td> </tr> <tr> <td> Percentage of these responses collected electronically</td> <td style="text-align: right;">80%</td> </tr> <tr> <td>c. Total annual hours requested</td> <td style="text-align: right;">1,070</td> </tr> <tr> <td>d. Current OMB inventory</td> <td style="text-align: right;">2,902</td> </tr> <tr> <td>e. Difference (+,-)</td> <td style="text-align: right;">-1,832</td> </tr> <tr> <td colspan="2">f. Explanation of difference:</td> </tr> <tr> <td> 1. Program change:</td> <td></td> </tr> <tr> <td> 2. Adjustment:</td> <td style="text-align: right;">1,832</td> </tr> </table>	a. Number of respondents	738	b. Total annual responses	1,338	Percentage of these responses collected electronically	80%	c. Total annual hours requested	1,070	d. Current OMB inventory	2,902	e. Difference (+,-)	-1,832	f. Explanation of difference:		1. Program change:		2. Adjustment:	1,832	<p>14. Annual reporting and recordkeeping cost burden: (in thousands of dollars) Do not include costs based on the hours in item 13.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">a. Total annualized capital/startup costs</td> <td style="text-align: right;">\$0.00</td> </tr> <tr> <td>b. Total annual costs (O&M)</td> <td style="text-align: right;">\$0.00</td> </tr> <tr> <td>c. Total annualized cost requested</td> <td style="text-align: right;">\$0.00</td> </tr> <tr> <td>d. Total annual cost requested</td> <td style="text-align: right;">\$0.00</td> </tr> <tr> <td>e. Current OMB inventory</td> <td style="text-align: right;">\$0.00</td> </tr> <tr> <td colspan="2">f. Explanation of difference:</td> </tr> <tr> <td> 1. Program change:</td> <td></td> </tr> <tr> <td> 2. Adjustment:</td> <td></td> </tr> </table>	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:	
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<p>15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X")</p> <p>a. Application for benefits e. P Program planning or management</p> <p>b. P Program evaluation f. Research</p> <p>c. X General purpose statistics g. Regulatory or compliance</p> <p>d. Audit</p>	<p>16. Frequency of recordkeeping or reporting: (check all that apply)</p> <p>a. <input checked="" type="checkbox"/> Recordkeeping b. <input type="checkbox"/> Third party disclosure</p> <p>c. <input checked="" type="checkbox"/> Reporting:</p> <table style="width: 100%;"> <tr> <td>1. <input type="checkbox"/> On occasion</td> <td>2. <input type="checkbox"/> Weekly</td> <td>3. <input type="checkbox"/> Monthly</td> </tr> <tr> <td>4. <input type="checkbox"/> Quarterly</td> <td>5. <input checked="" type="checkbox"/> Semi-annually</td> <td>6. <input checked="" type="checkbox"/> Annually</td> </tr> <tr> <td>7. <input type="checkbox"/> Biennially</td> <td>8. <input checked="" type="checkbox"/> Other (as needed)</td> <td></td> </tr> </table>	1. <input type="checkbox"/> On occasion	2. <input type="checkbox"/> Weekly	3. <input type="checkbox"/> Monthly	4. <input type="checkbox"/> Quarterly	5. <input checked="" type="checkbox"/> Semi-annually	6. <input checked="" type="checkbox"/> Annually	7. <input type="checkbox"/> Biennially	8. <input checked="" type="checkbox"/> Other (as needed)																										
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<p>17. Statistical methods: Does this information collection employ statistical methods? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>18. Agency contact: (person who can best answer questions regarding the content of this submission) Name: Delores Pruden, GTM Phone: 202-402-2496</p>																																		

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) 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;
- (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.

Signature of Program Official:

Date:

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

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

(See Attached)

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BACKGROUND

Through innovative private and public partnerships, the Neighborhood Networks Initiative continues to establish multi-service community learning centers that bring computer access and lifelong learning to low- and moderate-income residents and seniors living in HUD housing. Since its inception in 1995, Neighborhood Networks has encouraged the development of computer learning centers to build self-reliant neighborhoods. These centers provide computer literacy and Internet access; job skills training and placement; microenterprise activities; youth programs including homework assistance; senior programs; English as a Second Language (ESL) classes and other training; and access to childcare, health, nutrition, and wellness information.

Neighborhood Networks is an unfunded initiative, but FHA-insured and -assisted properties in good financial standing may provide centers with seed money for start-up costs. Center capacity varies from basic to state-of-the-art in numbers of computers, software capabilities, staffing, and programming resources. HUD Neighborhood Networks staff encourage and assist centers in the development of partnerships and business relationships within the local and regional community to help them become self-sustaining. Centers may also be eligible to apply for funding through HUD's Notice of Funding of Availability (NOFA) process and through other Federal agencies such as the Departments of Education, Labor, and Commerce, which have programs that provide financial assistance to initiatives such as Neighborhood Networks. Private businesses, foundations, and nonprofit organizations as well as financial, educational, and faith-based institutions are also potential sources of funding or in-kind contributions.

In fiscal year 2002, Congress made the first appropriations, which created the Public Housing counterpart to the Neighborhood Networks Initiative. The Public Housing Neighborhood Networks program is a competitive grant program. Grantees are Public Housing Authorities (PHAs) that use funding to create Neighborhood Networks centers on or near Public Housing developments. These centers may serve Public Housing residents as well as residents receiving other types of housing assistance.

In November 2007, the Public Housing Neighborhood Networks program grantees were given access to the Neighborhood Networks Web site portal. Approximately 200 PHAs manage more than 300 Neighborhood Networks centers across the country.

Since its inception, Neighborhood Networks has grown to approximately 1,850 centers operating in HUD housing properties throughout the United States, the U.S. Virgin Islands, and Puerto Rico. The Neighborhood Networks Initiative and Public Housing Neighborhood Networks program continue to grow, and common strategies and programs continue to contribute to overall program success and sustainability. In addition, there are ongoing shifts in center demographics as the population served by Neighborhood Networks centers increases and becomes more diverse. Populations served by the Initiative may include children, adults, seniors, non-English speakers, or any combination thereof.

In 2003, HUD conducted a national survey of Neighborhood Networks center directors to document center characteristics and identify commonalities and trends to guide the direction of the Neighborhood Networks Initiative (OMB No. 2502-0553). Intended for policymakers, the press, the many center stakeholders, and other audiences, the 2003 survey results provided an up-to-date profile of Neighborhood Networks centers and detailed information on center users, services offered, operating capacity, and existing challenges (Neighborhood Networks 2003 Report: *Delivering Technology Access to America's Communities*, U.S. Department of Housing and Urban Development, Office of Multifamily Housing Programs). The Office of Management and Budget (OMB) approved the data collection for a period of one year, requesting that HUD report on the survey response rate, burden estimate, and data reliability prior to extension.

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 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 business plan.

START is the primary mechanism through which center data are collected. The transition to a comprehensive and coordinated electronic data collection has:

- Eliminated the need for an annual telephone survey;
- Eradicated paper business plan submission;
- Improved the overall response rate from center directors and data quality;
- Provided more comprehensive, complete, and consistent data while minimizing burden on respondents; and
- Provided evaluation data on process and implementation to measure results and program success.

The Office of Multifamily Housing Programs is requesting renewal of OMB clearance for the enhanced Neighborhood Networks START application. HUD is also requesting clearance for the following associated tools and data collections:

- *The Online Classification Tool:* The Center Classification process provides benchmarks as a guide for center programming, evaluation, financial sustainability, partnerships, technology assessments and resident involvement. Previously incorporated in START, the Classification Tool is now directly accessible through the Initiative's "Neighborhood Networks at Work" portal.
- *Electronic Postcards:* HUD sends pre-populated e-mail postcards to all centers to verify basic contact information. This information assists HUD in updating the Neighborhood Networks contact database and HUD's *Directory of Neighborhood Networks Centers*.
- *Telephone Follow-up Call:* After a designated time period, telephone follow-up calls are conducted to retrieve information from non-respondents to the postcard mailing.

The following sections provide additional background on each component of the data collection process.

Neighborhood Networks Strategic Tracking and Reporting Tool (START). A key requirement for all Neighborhood Networks centers is the development of a START business plan, submitted to the Neighborhood Networks Coordinator in the HUD field office. As described in HUD Handbook 4381.5, HUD Management Agent Handbook, the overall goal of the START business plan is to assist center staff in the development and implementation of programs that help residents of FHA-assisted and -insured housing attain jobs through job training, telecommuting, microenterprise development, and other job-creating strategies.¹ Components of the START business plan address the center's mission, benefits to stakeholders, community resources, target audiences, center demographics, resident interests and involvement, overall goals, and marketing and administrative tasks.

Before centers submit a START business plan, they must set up 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.

The system allows the center staff to conduct the following activities:

- Create/modify and submit a center profile for approval.
- Receive feedback about the center profile from their respective HUD Neighborhood Networks Coordinator.

The system allows the HUD Neighborhood Networks Coordinators to conduct the following activities:

- 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.

¹ [http://www.hudclips.org/sub_nonhud/cgi/nph-brs.cgi?d=HBNT&s1=\(4381.5\)\[no\]&op1=AND&l=100&SECT1=TEXT_HITS&SECT5=HEHB&u=./hudclips.cgi&p=1&r=11&f=G](http://www.hudclips.org/sub_nonhud/cgi/nph-brs.cgi?d=HBNT&s1=(4381.5)[no]&op1=AND&l=100&SECT1=TEXT_HITS&SECT5=HEHB&u=./hudclips.cgi&p=1&r=11&f=G)

The system allows the HUD headquarters staff to conduct the following activities:

- 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.

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 center directors in the development and operation 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. The samples 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).² It should be noted that ROSS tools were included for *reference and educational* purposes only.

In 2001, the Office of Multifamily Housing Programs designed START as a mechanism to streamline and facilitate all data collection efforts, including business plan data. START has undergone several major enhancements to make the electronic process more comprehensive yet more efficient. START revisions contain enhancements that offer centers the ability to:

- Reduce repetitive entries by retaining each completed section.
- Update and change their online business plan continuously.
- Assess performance over the course of a fiscal year.
- Create additional accounts and user names.
- Receive a secure, computer-generated password if a password is forgotten.

In addition to being used for data collection and reporting, START serves as an instructional guide to center staff, explaining various components and their importance in the development and maintenance of center infrastructure. This revision also includes several features designed to assist HUD Neighborhood Networks Coordinators with business plan management and tracking, including the following:

- Review, comment on, and approve START business plans.
- Create a variety of reports for HUD Neighborhood Networks Coordinators.
- Provide instant information on centers at the national, state, regional, or office level or by fiscal year.
- Receive automatic e-mail notifications when business plans and center assessments and evaluation forms have been submitted and subsequent notifications to centers of approval status.
- Receive automatic e-mail reminders to complete timely reviews of center-submitted business plan and assessment and evaluation forms.

Implemented in FY05, a more fully integrated START data collection approach incorporated key variables from previous survey data collections, continues to improve overall communication between HUD Neighborhood Networks Coordinators and Neighborhood Networks centers, and has positively impacted START business plan completion and submission.

The Collection Forms document presents the screenshots and specifications for START, along with a section-by-section justification.

² 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.

Neighborhood Networks 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. The classification process provides benchmarks for center programming, evaluation, financial sustainability, partnerships, technology assessments, and resident involvement.

All operational Neighborhood Networks centers with a HUD-approved START business plan are considered Designated. Centers that were established prior to implementation of the classification process were “grandfathered” in as Designated centers.

Neighborhood Networks centers that are Certified must have attained the Designated classification and must have been operational for at least 12 months, have a HUD-approved START business plan and a HUD-approved START assessment and evaluation, and actively operate programs to support residents’ self-sufficiency.

Neighborhood Networks centers that have advanced to Model classification must have achieved Designated and Certified classification. They must also demonstrate attainment of seven mandatory Model Classification Standards related to period of operation, resident involvement, program guidelines, tracking, evaluation and reporting, partnerships, funding, and center environment. In addition, Model classification includes two optional standards pertaining to 501 (c) (3) status and center governance. Model classification is the only level that requires the center to request advanced classification, which initiates a review by the Neighborhood Networks Coordinator in the HUD field office.

The Collection Forms document included with this OMB submission includes a Classification Tool screenshot and description, including a complete description of each classification level and a section justification.

Postcard and Follow-up Script. As indicated above, HUD sends pre-populated e-mail postcards to all Neighborhood Networks centers, asking respondents to verify basic contact information and make any necessary corrections.

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

The Collection Forms document included with this OMB submission includes the text and format of the postcard and telephone follow-up script, and an item-by-item justification.

JUSTIFICATION

A.1. Circumstances of Data Collection/Item Justification

In accordance with HUD's mission to strengthen communities, the Offices of Multifamily Housing Program and Public Housing Investments continue 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 to build partnerships for the sustainability of the centers. The number of Neighborhood Networks centers has grown considerably since its inception as 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 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. In 2006, OMB renewed the 2004 submission granting HUD's clearance to collect operational and demographic information for an additional three years. The submission addressed the importance of reducing burden on centers and improving service quality. An extensive appendix was added with screenshots, specifications, descriptions, and justifications for START, the Classification Tool, and the electronic postcard, and telephone follow-up script.

In 2010, the proposed data collection effort will assist HUD in continuing to provide up-to-date information regarding the status of Neighborhood Networks centers; enhance communication between HUD staff and center directors; and provide valuable links to information connecting Neighborhood Networks centers with partners.

START Business Plan Justification

START business plans are essential planning and management tools for Neighborhood Networks centers. From an operational standpoint, it is the START business plan that keeps the center on-course, ensuring that essential tasks are carried out as intended. START business plans also provide the basis for center-level evaluations and program tracking analyses. Program evaluation and tracking is required by the Government Performance and Results Act of 1993 for any programs receiving Federal funds for center operations.

The START business plans guide 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, START enhances planning and operations among Neighborhood Networks centers and provides more reliable data for use by HUD Neighborhood Networks Coordinators and center staff.

START includes all of the critical information that is captured in business plans, assessments, 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.

Classification Tool Justification

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

The Classification Tool provides automatic evaluation of center data, enabling the automatic classification of centers as Designated and Certified based on system data either collected by the Contractor or as a byproduct of collecting data through START. Center data must be entered for the attainment of Model classification because this information is not collected through other business processes.

Electronic Postcard and Telephone Follow-up Justification

The e-mail postcard and telephone follow-up data collections are authorized under Title 12 (12 U.S.C. 1701z-1 et seq.). A copy of the legislation is included in the Laws and Regulations Document of the OMB Clearance Package. 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 Collection Form document includes descriptions of each major element of the three data collection instruments, and the justification or reason why the element is included in the tool.

A.2. Purposes and Use of Information

The respondents are the representatives of approximately 1,850 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 START 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, HUD Neighborhood Networks Coordinators, Public Housing Grant Managers, and Public Housing centers. The information gathered assists HUD staff and program staff in monitoring the performance of each center and assures the accuracy of publicly accessed information. Center classification data will ensure effectiveness in creating programs and services that promote self-sufficiency among residents of HUD housing properties.

In addition to benefits to HUD staff, the information collection will continue to support Neighborhood Networks center directors and staff in making informed decisions, documenting the outcomes of their centers, and assessing overall center performance.

A.3. Use of Information Technology

START, and the 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 START 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 START 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. START 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.

The Classification Tool will provide automatic evaluation of center data, enabling automatic classification of centers as Designated or Certified, based on data collected through START. The entry of center data is required for the attainment of Model classification because this information is not otherwise collected through other business processes. As with START, the Classification Tool utilizes technology to provide related online management and statistical reports for HUD Neighborhood Networks Coordinators and other participating HUD staff.

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

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

A.4. Efforts to Identify Duplication

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. In 2006, OMB renewed the 2004 submission granting HUD's clearance to collect operational and demographic information for an additional three years. An extensive appendix was added with screenshots, specifications, descriptions, and justifications for START, the Classification Tool, the electronic postcard and the telephone follow-up script. These tools were designed to improve and streamline the information collection process. The 2010 data collection will continue to provide HUD with updated information regarding center demographics and operations.

The only other quantitative study to date was a survey of Neighborhood Networks centers conducted in 1999 by the Urban Institute.³ However, this survey was limited by its small sample size. The survey results were based on a final sample of 56 computer learning center directors. The general recommendations from the 1999 study helped to guide the framework for the larger scale collections of data from Neighborhood Networks centers.

Through the use of technology, START, and the Center Profile and 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 updates their online center and property information. Additionally, through the use of an integrated database management system, START, and the Classification Tool 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 or Certified.

A.5. Involvement of Small Entities

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:

START has been enhanced to assist center staff in tracking activities. START was also designed with the goal of helping small centers 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 both center and HUD staff to assist in completing the START business plan. Additionally, START enables centers to reuse information 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 five and one-half hours. This estimate includes time for reviewing and completing the user guide, as appropriate.

Center Classification encourages mentorship by Model 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.

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 also assists with data accuracy and data entry.

³ Kingsley, G. Thomas; Abravanel, Martin; Corvington, Patrick; Hayes, Christopher; Herbig, Carla; and Levy, Diane. 2000. *Computer Learning in Assisted Housing*. Washington, D.C.: The Urban Institute.

A personalized electronic postcard data collection, plus telephone follow up, is used to verify and supplement the information collected in the Center Profile Tool. This three-tiered data collection approach is particularly beneficial for smaller centers with limited computer capacity. The combined approach helps to maintain a current profile of Neighborhood Networks centers, while minimizing overall burden on center staff.

A.6. Consequences of Less Frequent Data Collection

New Neighborhood Networks centers are required to complete START business plans covering a period of three 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. 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, Certified, and Model. When a center requests Model classification, it must provide documentation that the seven required standards have been met. The only additional data collection is to correct the original submission as requested by HUD staff, if necessary.

If the START business plan data is captured less frequently, centers will be less likely to sustain themselves as organizations. START allows centers to plan for sustainability by developing budget projections, establishing program goals and expected outcomes, and planning for partnership development. It can also be used 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 and Certified classification via data collected by START. In addition, centers use START 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 data collection 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 a model 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.

A.7. Consistency with the Guidelines in 5 CFR 1320.5(d)(a)

There are no special circumstances that would require the information to be collected in a manner that is inconsistent with the above-referenced Federal guidelines.

A.8. Consultation with Persons Outside of the Agency

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 provided initial support to Neighborhood Networks center staff nationwide through training and workshops.

The specific Aspen staff involved in designing the original data collection in 2003 were:

- 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 Marte, Systems Analyst, 301-519-5636

In 2005, DB Consulting Group, Inc. became the Prime Contractor and is the current manager of the system. Lockheed Martin Information Technology (LM) is currently a subcontractor to DB Consulting Group, Inc. In addition to the LM staff listed above, the following Neighborhood Networks Contractor staff were involved in preparing the 2006 submission:

- Silvia Benavides, Neighborhood Networks Program Development Manager, 301-589-4020, extension 361
- Mark Fiery, Neighborhood Networks Web/Database Specialist II, 301-589-4020, extension 364
- Abhi Madhugiri, Neighborhood Networks CLIN 3 Project Director, 301-589-4020, extension 158
- Steve McLaine, Neighborhood Networks Project Manager, 301-589-4020, extension 337
- Biby Thoms, Neighborhood Networks IT Senior Developer, 301-589-4020, extension 205

The Neighborhood Networks Contractor staff involved in preparing this OMB submission are:

- Silvia Benavides, Neighborhood Networks Program Development Manager, 301-589-4020, extension 361
- Mark Fiery, Neighborhood Networks Web/Database Specialist II, 301-589-4020, extension 364
- Janeane Gibbs, Neighborhood Networks CLIN 3 Document Specialist, 301-589-4020, extension 226
- Sharon Glenn, Neighborhood Networks CLIN 2 Project Director, 301-589-4020, extension 333
- Veralee Liban, Neighborhood Networks Corporate Officer, 301-589-4020, extension 330
- Abhi Madhugiri, Neighborhood Networks CLIN 3 Project Director, 301-589-4020, extension 158
- Steve McLaine, Neighborhood Networks Project Manager, 301-589-4020, extension 337

In February 2009, the Neighborhood Networks team contacted six Neighborhood Networks centers by telephone to provide an estimate of respondent burden in terms of the amount of time required to complete the START business plan, the Center Profile Tool, the Classification Tool, and the electronic postcard. Calls were conducted with centers that completed START business plans and/or updated contact information via electronic postcards.

The table below shows the Neighborhood Networks centers contacted and the estimated time required for completing 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
Eureka Gardens I Ronald Milligan (904) 388-9872	8
Washington Heights Ronald Milligan (904) 388-9872	6
COGIC Highrise Apartments Neighborhood Networks Center Helen Woodley (757) 622-2513	1
Independence Hall Neighborhood Center Lee Huebel (713) 472-8565	2
Community Connections Learning Center Lori Krasienko (254) 759-1827	8
Elizabeth Canty Neighborhood Networks Pontress Hollowell (706)571-2944	8
Total Hours	33
Average Hours to Complete:	5.5

Center/Contact Person	Hours Required to Complete Classification Tool
Knowledge Center at the Terrace Heather Bischoff (317) 807-0400	.17
Plough Towers Computer Learning Center Dorothy Robinson	.25
Mt. Zion A.M.E. Apartments Resource Center Cynthia Harris (843) 669-1571	.25
Garrison Woods Neighborhood Networks Training Center Pamela Curtis (540) 657-5836	.25
Interfaith Homes Neighborhood Networks Center Jennifer Williams (269) 382-0012	.17
Goodwill Industries Diane Armstrong Learning Center Sofia Comas-Phillips (718) 777-6440	.17
Total Hours	1.26
Average Hours to Complete:	.21

Center/Contact Person	Hours Required to Complete Center Profile Tool
Eureka Gardens I Ronald Milligan (904) 388-9872	.33
Washington Heights Ronald Milligan (904) 388-9872	.33
COGIC Highrise Apartments Neighborhood Networks Center Helen Woodley (757) 622-2513	.17
Independence Hall Neighborhood Center Lee Huebel (713) 472-8565	.17
Community Connections Learning Center Lori Krasienko (254) 759-1827	.25
Elizabeth Canty Neighborhood Networks Pontress Hollowell (706)571-2944	.25
Total Hours	1.5
Average Hours to Complete:	.25

Center/Contact Person	Hours Required to Complete Electronic Postcard
Covenant Manor Tina Sardo (716) 483-3350	.05
Cross Line Towers Cheryl Land (913) 312-1899	.03
Benson Manor Neighborhood Networks Center Linda Newsome (770) 435-6406	.07
Fellowship Computer Center Merrill Knapp (860) 323-0881	.03
Nathan I. Nagler B’Nai B’rith House Computer Learning Center Judy Purnell (718) 358-1166	.02
Paradise at Parkside Computer Learning Center Marcus Clark (202) 398-2375	.04
Total Hours	.24
Average Hours to Complete	.04

A.9. Payments/Gifts to Respondents

START business plans are required for the designation of new centers and do not include remuneration. Further, respondents will not receive monetary payment or gifts for participating in the postcard data collection or for completing the Classification Tool or Center Profile.

A.10. Assurance of Confidentiality

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 START 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.

A.11. Questions of a Sensitive Nature

There are no questions of a sensitive nature included in the Neighborhood Networks paper business plan, START, the Classification Tool, or the postcard data collection instruments.

A.12. Estimates of Annualized Hourly Burden, Including Hourly Costs

START Data Collection

There are approximately 1,850 Neighborhood Networks centers currently in operation. Based on the pretest described in Section A.8, the hourly burden per respondent for START is estimated at 5.5 hours. This includes time for reviewing and completing the workbook and user guide. Approximately 1,085 of the 1,850 Neighborhood Networks centers currently in operation are using START; a completion rate of approximately 60 percent. It is anticipated that the START business plan completion rate will increase by another 11 percent (or 123 centers) annually. The completion of the START business plan by 123 centers and an average of 5.5 hours to complete START will result in an overall annual response burden of 677 hours.

The average rate of pay for Neighborhood Networks center directors is estimated at \$13.98 per hour. The rate represents the previously approved rate of \$11.55 per hour (based on a review of comparable HUD job descriptions) and a 10-percent increase for escalation of living expenses during the past two years. Based on an estimated average hourly rate of \$13.98 per hour for Neighborhood Networks center directors, the overall cost burden to respondents for completing START business plans online is estimated at \$9,464.

Classification Tool Data Collection

Approximately 15 (or .81 percent) of the 1,850 Neighborhood Networks centers will utilize the online Classification Tool. Based on an estimated average of .21 hours to complete the form, the overall annual response burden is 3.2 hours.

Based on an estimated average hourly rate of \$13.98 per hour for Neighborhood Networks center directors, the overall cost burden to respondents for completing the Classification Tool is estimated at \$44.74.

Electronic Postcard Data Collection

Approximately 1,200 of the 1,850 Neighborhood Networks centers are expected to respond to the postcard data collection, either electronically or by telephone. Based on an estimated average of .04 hours (2.4 minutes) to complete the form, the overall annual response burden is 48 hours.

Based on an estimated average hourly rate of \$13.98 per hour for Neighborhood Networks center directors, the overall cost burden to respondents for completing the postcard data collection is estimated at \$671.04.

Information Collection	Number of Respondents	Frequency of Response	Total Annual Responses	Hours per Response	Total Annual Hours	Hourly Cost	Total Annual Cost
START Data Collection	123	1	123	5.5	677	\$13.98	\$9,464
Classification Tool	15	1	15	0.21	3.2	\$13.98	\$44.74
Electronic Postcard	600	2	1,200	0.04	48	\$13.98	\$671.04
Total Respondents	738		1,338		728		\$10,180

A.13. Estimates of Other Annualized Cost Burden to Respondents or Record Keepers

There are no startup, capital, or operating costs to respondents associated with this data collection.

A.14. Estimates of Annualized Cost to the Government

The annualized cost to the government for START 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 and support	Average hourly rate for system maintenance and support	Non-labor costs	Total Annual Cost
START Data Collection and Profile Tool	\$135,588.25	2824	\$85.21	\$32,096.00	\$408,317.29
Classification Tool	\$72,909.00	349	\$85.21	\$30,352.00	\$138,999.29
Electronic Postcard	\$20,192.00	None	None	\$2,479.00	\$22,671.00
Totals	\$228,689	3173	None		\$569,987.58

A.15. Changes in Burden

The change in overall burden from the previous OMB submission reflects enhancements to the START system, the elimination of paper business plan submissions, and an increase in the hours needed to complete START business plans. Similar to the previous submission, the proposed data collection combines information from multiple vehicles. However, the current data collection includes a brief postcard (as opposed to a full-scale survey), and a Classification Tool.

A.16. Time Schedule, Publication, and Analysis Plan

Time Schedule

Since all new centers are required to complete a START business plan, and centers update plans as necessary, START 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 on a semi-annually basis with each data collection period extending over a one-month period.

Planned Analyses

Data from START, and Classification and Center Profile Tools 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.

A.17. Display of Expiration Date

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.

A.18. Exceptions to Certification Statement

The data collection involves no exceptions to the Certification for Paperwork Reduction Act.

INFORMATION EMPLOYING STATISTICAL METHODS

B.1. Respondent Universe and Sampling Methods

The respondent universe includes approximately 1,850 active Neighborhood Networks centers as identified from the Neighborhood Networks database. All centers are required to submit a START business plan, with an estimated 11 percent expected to complete or update a START business plan 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.

B.2. Information Collection Procedures

START, Classification, and Center Profile Data Collections

Centers are asked to create a START business plan for three consecutive fiscal years. A fiscal year is defined as the period beginning October 1st of the calendar year and ending September 30th 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 start-up year. Existing centers are also asked to report information about the current year.

After a START business plan is approved, all centers are requested to update START 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 START 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 offer; 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 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 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 focuses 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 START and can be modified and updated at any time.

Section 8: Assessment and Evaluation. To encourage centers to update, modify, and assess their START business plans annually, 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 START business plan while they record the center's actual yield.

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

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

For the best quality START 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 START business plan, centers are requested to update their Center Profiles to ensure that data collection is current.

Centers are not required to directly input any information into the Classification tool for Designated and Certified status. However, they may submit requests for Model classification once they believe they have met the requirements. This process and data collection only occurs once per center.

Electronic Postcard Data Collection

The postcard data collection will capture contact information from Neighborhood Networks centers. The proposed methodology is an e-mail 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 on a semi-annual basis.

B.3. Methods to Maximize Response Rates

START, Classification, and Center Profile Data Collections

Several procedures have been implemented 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.

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

The Center Profile data collection response rate will be 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 Designated and Certified classification, as well as e-mail reminders provided to HUD Neighborhood Networks Coordinators to review and approve applications for Model classification.

Electronic Postcard Data Collection

A mixed mode data collection approach (e-mail with telephone follow up) is used to achieve the highest possible response rate for this component of the data collection. The e-mail and telephone follow-up script emphasize the importance and the benefits of completion. For instance, the data collection is 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 to locate recipients for their donations and contributions. In addition, the postcard data helps HUD 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.

B.4. Tests of Procedures

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, the Center Profile Tool, and the electronic postcard. Calls were conducted with centers that have already completed START business plans and/or updated contact information via electronic postcard.

B.5. Statistical Consultants

The following individuals were consulted regarding the current design of the START system and the associated data collections:

- Silvia Benavides, Neighborhood Networks Program Development Manager, 301-495-4361
- Mark Fiery, Neighborhood Networks Web/Database Specialist II, 301-589-4020, extension 364
- Sharon Glenn, Neighborhood Networks CLIN 2 Project Director, 301-589-4020, extension 333
- Veralee Liban, Neighborhood Networks Corporate Officer, 301-589-4020, extension 330
- Abhi Madhugiri, Neighborhood Networks CLIN 3 Project Director, 301-589-4020, extension 158
- Steve McLaine, Neighborhood Networks Project Manager, 301-495-4337

Supporting Documents

The following documents are included in support of this submission:

Collection Forms (forms associated with the data collection)

Laws and Regulations (legislation and regulations authorizing data collection)

Summary Memo (note to have the 60-Day Federal Register Notice signed by the commissioner)

60-Day Federal Register Notice