

# Supporting Statement for Multifamily Housing Service Coordinator Program 2502-0447

## A. Justification

1. Section 671 of the Housing and Community Development Act of 1992 refers to applications for Service Coordinator grants as follows: “Application and Selection - The Secretary shall provide for the form and manner of applications for grants under this section and for selection of applicants to receive such grants.”

Regulation for the Service Coordinator Program is found at sections 24 CFR 84 and 24 CFR 85. Copies are attached for reference. The information presented in this paperwork burden package is required, for the most part, by administrative decision and written directive.

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 the need for funds, and effectively monitor grantees’ program performance and administration. In addition, the information collection will assist applicants in better determining their need for funds. The information will also enable grantees to more effectively evaluate their program performance; account for funds, and maintain appropriate program records.

2. Respondents are the owners/managers of projects designed/designated for the elderly or persons with disabilities. These projects must also have frail or at-risk elderly residents and/or non-elderly residents with disabilities who together total at least 25 percent (25%) of the project’s residents. HUD Field office staff use grant applications to determine an applicant’s need for and capacity to administer grant funds. Field staff evaluates applications based on an administratively designated selection process. HUD staff must receive eligible and complete applications in order to award grant funds. Likewise, Field staff receives, review, and approve requests for extension funding once a grant term has expired.

Form HUD-91186, Multifamily Housing Service Coordinator First-Time Funding Request, is used by applicants to estimate the supportive service needs of the residents. The level and type of services will indicate the need for a Service Coordinator and the number of work hours appropriate for the individual’s employment.

Form HUD-91186-A, Multifamily Housing Service Coordinator One Year Budget, outlines the applicant’s funding needs. Grantees must project program costs for a one-year term when preparing an extension request. This activity will help the grantee to assess the scale and costs of the program. They can maintain or reduce the scale of their program and request a suitable dollar amount for the next year.

Form HUD-2880, Applicant/Recipient Update/Disclosure Report, details the financial interests of the owner and management agent who are involved in the project.

Form SF-424, Application for Federal Assistance, is basic, required grant application form and provides the Department with the most important information included in the applicant’s request.

Form SF-424-Supplement, Survey on Ensuring Equal Opportunity for Applicants, is completed by nonprofit private organizations to provide HUD an understanding of the population of applicants for federal funds.

Form SF-LLL, Disclosure of Lobbying Activities, is required for each payment, or agreement to make payment, to any lobbying entity for influencing or attempting to influence, an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of

Congress in connection with a covered Federal action. The form must be completed at the initial filling and with any material change report.

Form SF-269-A, Financial Status Report (Short Form), is used to report the effect of the reporting period's transactions on the cumulative financial status. HUD Field staff will review these reports 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 finds 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.

Form HUD-50080-SCMF, LOCCS/VRS Payment Voucher, Service Coordinators for Multifamily Housing, is used by HUD to protect disbursement data from fraudulent actions, and to safeguard the Line of Credit Control System (LOCCS) from unauthorized access. Grantees submit these forms on a quarterly basis. This allows the Field staff to track expenses and drawdown 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.

The grantee will use the Financial Status Report and LOCCS Payment Voucher to set up or modify separate accounting procedures for Service Coordinator funds. Developing such procedures is essential for meeting accounting and reporting requirements of 24 CFR Part 84 and 85. Doing so will also help both the grantee and HUD better monitor use of funds.

Form HUD-96010, Logic Model for the Service Coordinator Program, is used for periodic reporting. Applicants submit this form with the initial application and semi-annually thereafter.

Form HUD-92456, Semi-Annual Performance Report, is required for each housing project that has Service Coordinators paid for with HUD funds. HUD requires one report semi-annually for each Service Coordinator position.

HUD Field staff will review semi-annual Performance Reports (HUD 92456) and Logic Models (HUD-96010) to evaluate the effectiveness and efficacy of grant-funded activities. The staff will compare proposed programs and objectives with realized results. If Performance Reports and Logic Models indicate poor administration of funds or activities, funds spent 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 of funds or levying other administrative or legal penalties.

Using the Semi-Annual Performance Report and Logic Model form will encourage Service Coordinators and grantee organizations to develop and maintain consistent record keeping and program evaluation procedures. Using the Performance report, all Service Coordinators will collect, record, and report the same information in a consistent manner over time. These procedures will better enable Service Coordinators to track the needs of their residents and assess their own effectiveness. They will also allow Service Coordinators to compare their work with their peers, for purposes of program evaluation and self-education. Consistent procedures will also enable HUD staff and other interested parties to collect comparable information over time from a number of Service Coordinators.

3. Applicants can only submit applications electronically through [www.grants.gov](http://www.grants.gov). Required reports can be submitted in hard copy or electronic form. Grantees can submit extension requests in hard paper copy or by electronic mail.

4. This information is not available through any other source and so must be collected. In the grant application, the applicant must indicate and describe the need for a Service Coordinator and the number of hours that would be appropriate for the individual's employment. The applicant must gather this information through informal or formal assessments. It is not available through any other source, primarily because the needs of the residents continually change. Grantees provide information in their Extension Requests based on their projections of program expenses in the year to come. This information is not available through any other mechanism. The information provided in the financial status and performance reports, and LOCCS payment voucher is also not discreetly available for the Service Coordinator program at particular sites. Applicants and grantees use Logic Model forms for self-evaluation, to identify and report on program performance measures.
5. This collection will not have a significant economic impact on small businesses or other small entities.
6. The required reports provide the minimum information needed to enable HUD staff to effectively monitor program operation. Without these reports, the Department's program management capability would be seriously impaired. If application content and extension request information were reduced, HUD staff's ability to select those applicants most in need of funds and most capable of administering funds could be impaired.
7. There are no special circumstances involved in this collection.
8. In accordance with 5 CFR 1320.8(d), this information collection soliciting public comments was announced in the *Federal Register* on 02/10/2010 (Volume 75, Number 2, Page 6684). No comments were received.

HUD has used similar application and extension request materials for the program for the last decade. During this period, applicants submitted over 6,000 applications for new and extension grant funds. Any comments received from those applicants have been incorporated into the application materials. In addition, HUD has received many comments regarding the Semi-Annual Performance Report and these have also been incorporated into updates of the report form.

In addition, HUD continues to meet with agent/owners, housing consultants, industry groups, residents, and other interested HUD program staff. Following is a list of some of the housing professionals (Housing Consultants and Intergenerational Housing Sponsors) that HUD consulted with by telephone, meetings, and/or workshop sessions:

Brent Elrod Generations United 1331 H Street, NW Suite 900 Washington, DC 20005 (202) 289-3979	Dave Taylor Presbyterian Senior Services 2095 Broadway Suite 409 New York, NY 10023 (212) 874-6633	Ana Beltran Generations United 1331 H Street, NW Suite 900 Washington, DC 20005 (425) 614-1940	Laura Jervis West Side Federation for Senior & Supportive Housing 2345 Broadway New York, NY 10024 (212) 721-6032
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9. There has been no decision to provide any payment or gift to respondents.
10. There have been no assurances of confidentiality provided to respondents.
11. No questions of a sensitive nature are part of the Service Coordinator Program.

12. Estimated burden and cost to respondents:

Respondents	Already Counted	Number
HUD anticipates 200 new applicants annually		200
Of the 200 applicants, HUD expects 100 new grantees. Only these new grantees will be required to sign the Grant Agreement and submit the HUD-96010 Logic Model semi-annually.	100	
There are currently 1,470 grantees.		1,470
Of the 1,470 current grantees, 1,000 will submit annual requests for extension.	1,000	
There are 3,800 projects that are not grantees of this program but that have Service Coordinators paid for with HUD funds, and must file the Performance Report.		3,800
<b>Total Respondents</b>		<b>6,570</b>

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hours Per Response	Annual Burden Hours	Hourly Cost	Total Annual Cost
Grant Application (includes HUD-91186, SF-424, SF-424 Supplement, SF-LLL, HUD-2880, HUD-96010)	200	1	200	40.00	8,000	\$19	\$152,000
Grant Agreement	100	1	100	.5	50	\$40	\$2,000
HUD-96010 Logic Model semi-annually	300	2	600	2.00	1,200	\$19	\$22,800
Grant Extension Request form HUD-91186-A	1,700	1	1,700	2.00	3,400	\$19	\$64,600
Performance Report HUD-92456	4,000	2	8,000	6.00	48,000	\$19	\$912,000
LOCCS Payment Voucher HUD-50080-SCMF	1,700	4	6,800	0.25	1,700	\$19	\$32,300
Financial Status Report SF-269-A	1,700	2	3,400	2.00	6,800	\$19	\$129,200
<b>Totals</b>	<b>4,300</b>		<b>20,800</b>	<b>52.75</b>	<b>69,150</b>		<b>\$1,314,900</b>

The estimated number of burden hours is based on experience and also discussions with Service Coordinators, their supervisors, and industry advocates.

The hourly cost is based on an average annual salary for Service Coordinators of \$40,000 and an owner of almost \$80,000.

The estimated respondents are increasing because of increased appropriations and the amount of grants run through an operating budget.

13. There are no additional costs to respondents.

14. Estimated cost to the Federal government:

Information Collection	Responses	Hrs per Response	Total Hours	Cost per Hour*	Total Cost
Grant Application (includes HUD-91186, SF-424, SF-424 Supplement, SF-LLL, HUD-2880, HUD-96010)	200	4.0	800	\$32.97	\$26,376
Grant Agreement	100	1.0		\$32.97	
HUD-96010 Logic Model semi-annually	600	1.0	600	\$32.97	\$19,782
Grant Extension Request form HUD-91186-A	1,700	2.0	1,700	\$32.97	\$56,049
Performance Report HUD-92456	8,000	0.5	4,000	\$32.97	\$131,880
LOCCS Payment Voucher HUD-50080-SCMF	6,800	0.5	3,400	\$32.97	\$112,098
Financial Status Report SF-269-A	3,400	0.5	1,700	\$32.97	\$56,049
<b>Totals</b>	<b>8,600</b>	<b>9.5</b>	<b>12,300</b>		<b>\$405,531</b>

Cost per hour based on an average annual salary of a GS-12.

15. This is an extension of a currently approved collection. The numbers of grant applicants and grantees seeking extension funds have decreased. However, the number of current grantees has increased and we are adding a new report for 70 new grantees and including the Grant Agreement. We have also included information collection required of multifamily properties with Service Coordinators paid for with project funds. These owners must submit semi-annual performance reports. These changes have increased the number of burden hours and costs for both the public and the federal government.

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

17. HUD is not seeking approval to avoid displaying the OMB expiration date.

18. There are no exceptions to the certification statement identified in item 19 of the OMB 83-I.

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

This information collection does not employ statistical methods.