

**Revised Justification Supporting Statement
Housing Opportunities for Persons with AIDS (HOPWA) Program
Paperwork Collection Efforts**

Summary

On February 11, 2011, OMB **Approved without change** the existing HOPWA paperwork collection activities extending these collection efforts to August 31, 2011. Following the receipt of Federal Register public comments and further consultations with grantees and HOPWA program technical assistance providers, HUD's Office of HIV/AIDS Housing has identified some additional minor revisions which include reinsertion of the leveraging requirement which informs the Department of the amount of other resources that compliment the investment of HOPWA resources. This reporting requirement is beneficial to both program grantees and the Department in identifying and reporting on the total dollar amount and source of these leveraged resources. This revised supporting statement follows the approved extension of HOPWA program performance reporting and program budget forms under OMB Control Number 2506-0133.

Note: OMB's approval of February 11, 2011 mistakenly reported an error in burden hours that precipitated approval of the following calculation: 30, 203 hours to 10,660 = -19,543. The source of these burden hours is unknown. In actuality, the submitted burden hour request of 26,616 represented a decrease of -3,550 hours from the previously approved burden hour total of 30,166.

The HOPWA forms that comprise this OMB approval consist of the following: (1) HOPWA Competitive and Renewal of Permanent Supportive Housing Projects Budget Form (HUD-40110-B); (2) Annual Progress Report (HUD-40110-C) for competitive grantees; and (3) Consolidated Annual Performance and Evaluation Report (HUD-40110-D) for formula grantees. (Note: the HOPWA Budget Form (HUD-40110-B) remains unchanged.) HUD is requesting a three (3) year approval timeframe.

These existing forms have been in use for over three years. Grantees have acclimated to the reporting requirements enabling the Department to compile and maintain an accurate database in which to provide national HOPWA program data that in conjunction with HUD strategic management goals and objectives. Recent issuance of the new *HUD Strategic Plan*, the Interagency Council to End Homelessness's *Opening Doors: The Federal Strategic Plan to Prevent and End Homelessness*, and the Office of National AIDS Policy (ONAP)'s *National HIV/AIDS Strategy* may necessitate some minor future changes to performance and reporting burden requirements. HUD continues to strive toward reducing grantee reporting burden by ensuring that all reporting requirements and guidance is clear and succinct. In addition, the Department consulted with HOPWA stakeholders, particularly the team of HOPWA national

technical assistance providers, to provide feedback and recommendations based upon their familiarity and ongoing efforts to provide guidance and training to program grantees to comply with these reporting requirements. The proposed revisions also incorporate comments received during the public comment period, as well as feedback on a consultation to align HOPWA reporting forms with the Department's Homeless Management Information System (HMIS).

A. Justification

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

1. The Department proposes minor revisions and technical edits to the performance reporting format for competitive grantees in the Annual Progress Report (APR) (HUD-40110-C), and for formula grantees in the Consolidated Annual Performance and Evaluation Report (CAPER) (HUD-40110-D). The data elements in these forms will also be used to inform updates to Community Planning and Development's (CPD) Integrated Disbursement Information System (IDIS). These IT enhancements are now underway and will further reduce burden through use of this web-based reporting tool. These revisions promote the usability of the forms and reduces grantee burden as grantees will spend considerable less time on the completion of these forms. Revisions include formatting changes and removing verbose sections in the directions and instructions pages.

The APR and CAPER are used by HOPWA grantees to provide performance reporting on beneficiary information and outcomes related to access to care, prevention of homelessness, and housing stability and to record programmatic accomplishments on low-income persons living with HIV/AIDS. HUD systematically reviews and conducts data analysis in order to prepare national and individual grantee performance profiles that are used to measure program performance against benchmark goals and objectives but to communicate the program's achievement and contributions towards Departmental strategic goals. Both the APR and CAPER, in tandem with the Integrated Disbursement Information System (IDIS), are program management tools that allow HUD to evaluate the success of the HOPWA program through grantee performance outcomes, as well as financial management tools. At this time, IDIS is not programmed to record performance outcomes for HOPWA formula grantees and for consistent collection off elements approved for existing program collection authority

In order to maintain program continuity, the Department has carefully reviewed the current approved forms to streamline and clarify sections of the APR and CAPER as follows:

- *Directions and Definitions*, additional clarification has been provided to assist with the completion of the forms in an accurate manner.
- *Grantee Summary, Project Sponsor/Subrecipient Summary*, columns changed to ensure clarity in these sections and removal of extraneous columns.

- *Grantee Narrative/Assessment*, removal of logic model submission and streamlining of directions.
- *Summary of Performance Outcomes*, inclusion of summary table in access to care section to allow calculation of percentages of households served
- *Summary Overview of Grant Activities (APR/CAPER)*, inclusion of homeless summary table and inclusion of transgendered persons in the age and gender charts. Revamped leveraging section to underscore the importance of non-HUD investments.
- *Summary of Project Sponsor Information*, re-structuring of Short-Term Rent, Mortgage and Utility Assistance (STRMU) to identify assisted households by type of housing assistance rather than the existing reporting requirements that aggregates household data.

In addition, definitions and directions have been updated on the forms to address inconsistencies. Moreover, information from other HUD and federal government guidance (Continuum of Care, Homeless Management Information System (HMIS), and Ryan White guidance) has been updated in the proposed revisions. The Department estimates that total grantee burden hours for performance reporting requirements has been increased by 446 hours, representing an additional four hours of increased burden per grantee.

Proposed revisions to the CAPER and APR are as follows:

- Various technical edits to clarify definitions in the directions or in the wording of sections to conform language between the HOPWA reporting tools and HMIS Data Standards, standardize the language of definitions between the CAPER and APR, and eliminate any additional ambiguities between the forms.
- CAPER/APR – reinsert Sources of Leveraging that had been removed from the latest revision submission. Leveraging had previously been integrated with program income reporting. This latest revision distinguishes whether the leveraging provides Housing Subsidy Assistance or Other Support (such as case management and other forms of supportive services) - (CAPER Part 2 Sources of Leveraging and Program, 1. Sources of Leveraging; and APR Part 3 Summary Overview of Grant Activities, 1. Sources of Leveraging). In addition, the revised reporting requirement would distinguish between the reporting of “Program Income” and “Resident Rent Payments Collected” since grantees and project sponsors maintain separate financial accounting of these sources of income. HUD field offices monitor this financial reporting similarly.
- APR - add a total number of households in the Access to Care table (APR Part 4, Section 3) so that percentage of total households receiving access to care may be calculated for national performance reports.
- APR - the term Housing Assistance, which refers to persons assisted with direct housing payments has been renamed Housing Subsidy Assistance, to ensure that there is no confusion to grantees on how HUD calculates outputs on the number of households assisted by direct housing subsidy payments (APR Part 3, Section C).

- CAPER/APR – revised definition of a household to include “live-in-aide” and to clarify the intention of non-beneficiary to signify that it means a shared housing arrangement with a roommate.
- CAPER (Part 7: Summary of Grant Activities, Section 2, Beneficiaries, a. Total Number of Beneficiaries Served with HOPWA Housing Assistance) a new column was added to include reporting of non-HIV program beneficiaries who reside with the HOPWA eligible individual and benefit from HOPWA housing subsidy assistance. There was an existing blank row on this form that enabled this revision since the inclusion of this information was an oversight during the previous revision effort.

Completed revisions to the key areas described above are discussed at length below.

I. Directions and Definitions, (*pg. 2+3 of APR and CAPER*).

The proposed edits to the directions/definitions page have been changed to provide for consistency and clarity between the definitions in the APR and CAPER. Moreover, the edits to certain existing definitions are a reflection and result of certain programmatic changes. For example, in FY2010, HUD expanded the definition of chronically homeless person to include families. Also, inconsistencies between the definitions section have been addressed and streamlined to ensure that grantees have the necessary information to complete the forms. The definition of a faith-based organization has been included since project sponsors are asked to provide specificity as a non-profit organization. In response to feedback received in the public comment period, definitions for housing subsidy assistance total, housing placement assistance, and live-in aide have been added to provide additional clarity.

II. Grantee Summary, Project Sponsor and Subrecipient Information (APR) Part I, Section 1 and 2, Part 5 Section 1 and 2, and (CAPER) Part I, Section 1, 2 and 3.

Grantee summary directions have been edited to provide concise and clear direction to grantees for completing the APR and CAPER. Row headings more accurately reflect the information required by the Transparency Act of 2006 (Public Law 109-282). Additionally, the inclusion of the CCR Registration box on the APR provides consistency of information as required by OMB. HUD is also removing the CCR registration box from the project sponsor and sub-recipient summary as it is not required for sub-contractors/sub-grantees. Extraneous narrative information pertaining to grantee evaluation reports has been deleted from both the APR and CAPER. Other minor technical edits of column wording will provide for more accurate submission of information and will lead to a reduction in the number of hours expended by HUD staff to review these documents for accurateness.

III. Grantee Narrative and Performance Assessment (APR), Part 2 Section C, Grantee and Community Overview (CAPER) Part 1, Section 3.

In the section dedicated to reporting on program outcomes, additional clarity has been provided to capture information on best practices by allowing programs to describe the strategies utilized to provide successful program delivery. A geography/rural access box has also been incorporated as a barrier in the barriers/recommendations box due to the changing needs of the low-income HIV population. This change was developed by the technical assistance providers in reflection of their ongoing efforts to assess the needs of HOPWA grantees.

IV. Summary of Project Sponsor Information Part 5, Section B, Accomplishment Goals Planned Goal and Actual Output Part 3, Section 3.

The Short-Term Rent, Mortgage, and Utility Assistance (STRMU) summary allows HUD to assess the numbers of households and HOPWA expenditures by program activity. In its current approved version, the form solicits a total number versus individual program activity components to capture this information. This change is minor in nature and will provide HUD with a more in-depth profile of the STRMU program.

The following changes are applicable to the APR only.

I. Grantee Narrative and Performance Assessment.

The HOPWA forms remove the requirement and submission of a logic model in light of the considerable burden placed on grantees. Grantees find this APR reporting requirement cumbersome, confusing, and ambiguous in nature.

The Assessment of Area's Unmet Needs for HOPWA-eligible households has been renamed "Planning Estimates of Unmet Needs for HOPWA-eligible Households". In addition, STRMU assistance is categorized by activity type. Although grantees would be requested to provide additional information pertaining to the type of STRMU activities undertaken, grantees already maintain STRMU assistance by activity type. Subsequently, an additional data collection and reporting burden is not envisioned since individual client records specify the type of STRMU assistance received.

II. Summary Overview of Grant Activities.

There are two proposed additions to Part 3, Section 1, and Section 2, respectively. A homeless individual's summary has been added to allow HUD to track the number of HOPWA eligible individuals who are either homeless veterans or designated as chronically homeless. As stated in the *Opening Doors* plan, reducing and eliminating homelessness among veterans, chronically homeless persons, and homeless families are signature initiatives of the plan. HUD proposes inserting this chart to capture the number of HOPWA eligible individuals who also identify as homeless veterans and/or chronically homeless. In the beneficiaries section, in the Age/Gender chart, two new options have been added to capture information about transgendered clients. A transgendered male to female and transgendered female to male option have been added to help

assess needs among this population. The inclusion of this element is in line with the recently released Homeless Management Information System (HMIS) data standards, as well as the Ryan White Careware Client-Level Data Dictionary.

The following changes are applicable to both the APR and CAPER.

- I. APR, Part 3, Summary Overview of Grant Activities, B. Sources of Leveraging and CAPER, Part 2, Sources of Leveraging.

In a previous edit to the revised forms, leveraging was removed due to the complexity of the reporting requirements and the difficulty for grantee compliance with these requirements. However due to fiscal challenges ahead, HUD decided to reinstate the leveraging section but in a new, simplified format. This section will allow HUD to assess a grantee's investment in the program and will help grantees prepare for challenging fiscal times ahead by allowing an opportunity for grantees to critically think about fiscal challenges ahead.

- II. APR, Part 5, Summary of Project Sponsor Information; 2. Short-Term Rent, Mortgage, and Utility Assistance (STRMU) and CAPER, Part 3, Accomplishment Data Planned Goal and Actual Outputs; and 3. Short-Term Rent, Mortgage, and Utility (STRMU) Summary.

The Housing Assistance categories have been expanded to enable reporting by type of activity in order to determine households assisted and program expenditures by activity type rather than by aggregating a cumulative total.

- III. APR/CAPER, Part 4, Section 3, HOPWA Outcomes on Access to Care and Support.

The inclusion of a new summary table in the access to care section allows HUD to more accurately report on the percentage of HOPWA housing subsidy assisted and supportive service assisted households on their success in utilizing housing as a platform to better health outcomes.

The following changes are applicable to the CAPER only.

- I. PART 7: Summary Overview of Grant Activities: Information on Individuals, Beneficiaries and Households Receiving HOPWA Housing Assistance (TBRA, STRMU, Facility-Based Units, and Master Leased Units ONLY).

This is a new data collection and reporting requirement for HOPWA formula grantees who submit a CAPER report. Its design and content replicates the existing APR data collection and reporting requirements in place for competitive grantees. This new requirement serves as a beneficiary worksheet to enable HOPWA grantees to provide HUD with specific beneficiary data for those receiving housing assistance. The rationale for incorporating this APR data element into the CAPER is to obtain program data that is currently not collected through on-line IDIS reporting. HOPWA formula grantees are required to use IDIS for drawing down program

funding that includes basic program activity information. However, current IDIS reporting does not align with existing CAPER data elements. Since enhancements to HOPWA IDIS reporting has not been completed, it is critical to meet both program performance and Department strategic goal reporting; consequently, these data elements are being included into CAPER reporting. A modest reporting burden is envisioned since grantees maintain client records which identify the information being requested.

2. There are no proposed changes to the HOPWA Project Budget Summary form (HUD-40110-B).

This submission requirement by competitive and renewal grant applications enables HUD to determine applicant eligibility for, to establish grant amounts, and to ensure that technical requirements are met prior to the execution of a grant agreement. The budget form also allows HUD to evaluate competitive grant applications and determine if the proposed project is a feasible one and to measure project success against planned and actual accomplishments. Moreover, these reports allow HUD with essential information on project outcomes and other activities that are reported to Congress, as well as a monitoring tool in the use of federal funds and also ensuring statutory and regulatory compliance.

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

At this time, the CAPER and APR forms are paper-based information collecting system in which performance data is entered into an Access database system. However, the Department has invested time to make these forms available in an electronic form that allows completion electronically. Moreover, the Department accepts electronic submissions of the APR and CAPER.

The Department's Integrated Disbursement and Information System (IDIS) does not capture performance information for HOPWA formula grantees consistent with all of the elements approved for program reporting. This is the result of the system's current inability to capture performance data that is useful to the HOPWA program. However, the Department will begin updating the IDIS HOPWA program screens during fourth quarter FY2011 so that performance data may be captured through this system.

4. In the proposed revisions, an effort was undertaken to identify repetitive data elements that grantees viewed as ambiguous. Directions for completing the forms were streamlined and redundant sections were removed or reworded.

All of the proposed revisions to the APR and CAPER forms went through a peer review process. Feedback, suggestions, and comments were taken into consideration by the Department during the edits to these forms. The suggested edits will not add additional burden to grantees as all proposed edits and revisions are minor and technical in nature.

5. The proposed information collection does not adversely impact small businesses or other entities as states, units of local government, and non-profit organizations are eligible grant applicants. A concerted effort to reduce burden on grantees was undertaken to ensure that grantee burden was reduced and that HUD would have sufficient information to report on performance objectives and to rate grantee applications.

6. Information on the existing competitive grant application Project Budget form is used in consideration with the rest of the application. If information was not captured in this form, the Department would be hindered in its effort to determine and assess grantee performance and in awarding new competitive grant applications and existing renewal applications.

APR and CAPER performance reports are collected and analyzed on an annual basis and is used to assess grantee performance, draft budget justifications, and to report to Congress on program activities and performance measurement accomplishments. Less frequent submission of information would considerably hinder the mission, efficiency, and legal aspects of program management. In addition to the use of IDIS as a financial management tool, these paper-based forms are the foundation of information on program accomplishments. Information from the performance reports are posted on the HOPWA HUD website and are used by HUD field offices, grantees, and the public. These forms serve as an accountability tool and allow HUD to monitor and evaluate the HOPWA program. HOPWA grantees may also use the information to justify additional resources from state and local government and also to inform public awareness and support of their program.

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

8. HUD published notices in the *Federal Register* to solicit public comment on January 4, 2011 (with a comment due date of March 7, 2011) and May 4, 2011 (with a comment due date of June 3, 2011).

HUD received comments from two HOPWA program formula grantees (New York City Department of Health and Mental Hygiene and City of Orlando, FL). Comments were directed within the context of enhancing the quality of reporting and/or to clarify ambiguity in the directions or in the wording of certain data elements. Additional comments from New York City pertained to addressing ambiguities surrounding definitions in HOPWA regulations versus the definitions in the directions to the APR and CAPER forms existing in the currently approved version. HUD has accepted these comments with the exception of New York City's claim with respect to burden hour concern.

New York City is the HOPWA program's largest formula grantee, representing approximately 17% of the FY2011 appropriation (\$55,968,318). The size of this grant award coupled with the overall administrative complexity of managing and providing oversight to 61 project sponsors that deliver coordinated housing and supporting services clearly suggests that their reporting burden is an exception. The Department's estimate of the burden hours is a good faith average

of the burden for an average-sized grantee and incorporates deviations between small and large size grantees.

In addition, HUD solicited informal comments from the HOPWA program technical assistance providers who routinely conduct trainings on these forms and have been able to identify problematic sections and areas of confusion on these forms. All suggested edits were given strong consideration and most suggestions were incorporated into the proposed revisions of these documents.

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 all forms are in compliance with this requirement. Moreover, data elements are included as part of the IDIS and HMIS 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

Description of Information Collection (Annual Reports)	Number of Respondents	Responses per Year	Total Annual Responses	Hours per Response	Total Hours
40110-B HOPWA Competitive and Renewal of Permanent Supportive Housing Projects Budget Form	35	1	35	12	420
40110-C Annual Progress Report (APR)	96	1	96	56	5,376
40110-D Consolidated Annual	125	1	125	42	5,250

Performance and Evaluation Report (CAPER)					
Recordkeeping	256	1	256	60	15,360
Grant amendments and extensions	20	1	20	20	400
Uniform relocation act appeals process	2	1	2	8	16
Environmental review recordkeeping	10	1	10	24	240
Miscellaneous other reporting	N/A	N/A	N/A	N/A	N/A
Total of grantee annual reporting burden:	256		256		27,062

Hourly cost estimate of \$23 x 27,062 hours = \$622,426.

Each grant recipient is required one response per submission. 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.

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 Hours	Hourly Rate	Estimated Cost (\$)
Review of Project Budget Summary	35	12	420	40	16,800
Grant selection and award/technical	25	24	600	40	24,000

submissions and grant agreements					
Review and analysis of APR and CAPER performance reports	96/125	16/12	1,536/1,500	40	61,440/60,000
Submitted amendments	72	6	432	40	17,280
Website posting of grantee performance results and accomplishment summaries	220	4	880	40	35,200
Uniform relocation act appeals	2	4	8	40	320
Environmental review recordkeeping	10	12	120	40	4,800
Total of projected administrative costs:	585		5,496		\$219,840

Hourly cost estimate of $\$40 \times 5,496 = \$219,840$.

15. The Department’s estimates include the burden hour revisions to the Project Budget Summary, Annual Progress Report (APR), and the Consolidated Annual Performance and Evaluation Report (CAPER). The overall burden hours for all three documents have changed respectively. The total number of respondents has increased for the APR and CAPER but has slightly decreased for the Project Budget Summary Form. The hours per response column for these documents have been decreased to reflect increased grantee familiarity and guided technical assistance and outreach by HOPWA technical assistance providers. The Department determined these hour revisions with the input from several technical assistance providers whom help train and familiarize the HOPWA grantees with the forms. Moreover, the Department’s proposed edits and revisions have also contributed to the estimate of hourly burden for grantees.

It is projected that the proposed revisions will slightly decrease the overall burden requirement as shown below:

Existing Burden Hours: 26,616

Revised Burden Hours:	27,062
Net Change:	+446
Adjustment: Increase	+446

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.