DATA COLLECTION AND REPORTING FOR HUD'S HOMELESS ASSISTANCE PROGRAMS

OMB PAPERWORK REDUCTION ACT SUBMISSION

DECEMBER 2012

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Part A Justification

This package is being extended without revisions. Each of the paragraphs below was submitted in the last package and has not changed. For calendar year 2014 we will be making substantial changes and thus are requesting a one year extension.

A1 Need and Legal Basis

Why is this information necessary? Identify any legal or administrative requirements that necessitate the collection.

This request is for clearance of data collection and reporting to enable the U.S. Department of Housing and Urban Development (HUD) Office of Community Planning and Development (CPD) to continue to manage and assess the effectiveness of its homeless assistance programs on an annual basis. HUD uses two primary mechanisms to meet its oversight responsibilities for these programs. First, it requires grantees and project sponsors that receive funding through Continuum of Care Homeless Assistance Programs (authorized by the McKinney-Vento Homeless Assistance Act) to prepare and submit annual project-level reports on performance and spending. Second, it funds an annual research effort to estimate the total number of homeless persons served through homeless assistance programs nationwide each year, their characteristics, and their service needs. The Annual Homeless Assessment Report is based on the submission of aggregate community-wide reports.

Both reports rely on a primary data source in each community – a local Homeless Management Information System (HMIS). An HMIS is an electronic data collection system that stores person-level information about homeless persons who access a community's homeless service system. Over the past decade, HUD has supported the development of local HMIS by funding their development and implementation, by providing technical assistance, and by developing national data standards that enable the collection of standardized information on the characteristics, service patterns and service needs of homeless persons within a jurisdiction and across jurisdictions. These standards are described in HUD's Homeless Management Information Systems (HMIS) Data Standards, cleared by OMB with the HPRP reporting package (OMB Control Number 2506-0186). The data elements provide the basis for data collection for the 2506-0186 and the reporting requirements proposed in this package. In conjunction with the re-tooling of HUD reporting requirements described in this submission, HUD is revising the data elements in the HMIS Data Standards. The proposed revised data standards are provided as a supplement to this OMB package.

The need and legal basis for these reporting requirements are presented below.

A.1.1 Annual Performance Reports (APR) for Homeless Assistance Programs

The existing Annual Progress Report (APR) (OMB Approval No. 2506-0145; Expiration: March 31, 2013) is a reporting tool that tracks the progress and accomplishments of the following competitive Homeless Assistance Programs: the Supportive Housing Program (SHP), Shelter Plus Care (S+C), and Section 8 Moderate Rehabilitation for Single Room Occupancy Dwellings (SRO) Program. Recipients of funding under the SHP, S+C, and SRO programs must complete and submit a progress report for each year in which assistance is received. In addition to providing the Department with important information to monitor individual project performance, the reports inform the Department's competitive process for homeless assistance funding and enable the Department to report on overall program performance via the Performance Assessment Rating Tool. The APR is also used at the local level to evaluate program performance and to inform the Continuum of Care (CoC) application process (OMB Control Number 2506-0112).

With this OMB request, HUD is proposing to re-design the APR to meet two key objectives. First, proposed changes to current data collection requirements will enable grantees and project sponsors to report more accurately on project accomplishment and outcomes. Second, HUD proposes to increase reporting efficiency by developing a web-based reporting tool. In the future, the APR will be part of a streamlined and integrated program management, reporting, and application system through *e-snaps*, HUD's new electronic portal for the annual Continuum of Care competitive funding process. With the re-design, HUD also proposes to change the title of this reporting tool from the Annual Progress Report to the Annual *Performance* Report (APR).

Funding recipients are mandated to collect and report APR information to HUD per the following federal regulations (see Attachment A):

- **Supportive Housing Program** (CFDA 14.235): 24 CFR section 583.300 (g): "*Records and reports.* Each recipient of assistance under this part must keep any records and make any reports (including those pertaining to race, ethnicity, gender, and disability status data) that HUD may require within the timeframe required."

- **Shelter Plus Care** (CFDA 14.238): 24 CFR section 582.300 (d)(1): "*Records and reports.* (1) Each recipient must keep any records and, within the timeframe required, make any reports (including those pertaining to race, ethnicity, gender, and disability status data) that HUD may require."

- **Section 8 Moderate Rehabilitation for Single Room Occupancy Dwellings Program** (CDFA 14.249): 24 CFR section 882.808 (p): "*Records and reports.* Each recipient of assistance under this subpart must keep any records and make any reports that HUD may require within the timeframe required."

A.1.2 Annual Homeless Assessment Report

Beginning with the FY 1999 HUD Appropriations Act, Congress called upon HUD to collect data from communities across the country in order to better understand the nature and extent of

homelessness nationwide. House Report 105-610 stated the rationale for and scope of this data collection effort:

> *…HUD is directed to work with a representative sample of jurisdictions to collect, at a minimum, the following data: the unduplicated count of clients served; client characteristics such as age, race, sex, disability status; units (days) and type of housing received (shelter, transitional, permanent); and services rendered. Outcome information such as housing stability, income and health status should be collected as well. Armed with information like this, HUD's ability to assess the success of homeless programs and grantees will be vastly improved.*

Subsequent Senate and House Appropriations Committee reports have reiterated Congress's directive to HUD regarding the importance of collecting data on homeless persons and the opportunity to capture this information through local Homeless Management Information Systems (HMIS). In the FY 2001 HUD Appropriations Act, Congress made the cost of implementing and operating an HMIS an eligible activity under the Supportive Housing Program and directed HUD to take the lead in requiring every jurisdiction to have client-level reporting within three years. FY 2001 Senate Report 106-410 stated the following:

> *The Committee believes that HUD must collect data on the extent of homelessness in America as well as the effectiveness of the McKinney homeless assistance programs in addressing this condition. These programs have been in existence for some 15 years, and there never has been an overall review or comprehensive analysis on the extent of homelessness or how to address it. The Committee believes that it is essential to develop an unduplicated count of homeless people, and an analysis of their patterns of use of assistance (HUD McKinney homeless assistance as well as other assistance both targeted and not targeted to homeless people) including how they enter and exit the homeless assistance system and the effectiveness of assistance. The Committee recognizes that this is a long term effort involving many partners. However, HUD is directed to take the lead in approaching this goal by requiring client level reporting at the jurisdiction level within 3 years.*

> *To improve the capacity of local providers and jurisdictions to collect data, the bill includes language that makes implementation of management information systems (MIS), as well as collection and analysis of MIS data, an eligible use of Supportive Housing Program funds. Further, the bill includes language allowing HUD to use 1 percent of homeless assistance grant funds for technical assistance, for management information systems, and to further its efforts to develop an automated, client-level APR system. Of this amount, at least $1,500,000 should be used to continue on an annual basis to provide a report on a nationally representative sample of jurisdictions whose local MIS data can be aggregated yearly to document the change in demographics of homelessness, demand for homeless assistance, to identify patterns in utilization of assistance, and to*

demonstrate the effectiveness of assistance. The Committee also expects HUD to use technical assistance funds to assist in the development of an unduplicated count. The Committee instructs HUD to use these funds to contract with experienced academic institutions to analyze data and report to the agency, jurisdictions, providers and the Committee on findings.

Most recently, Congress expressed support for the implementation of HMIS and the development of a national report on homelessness in conjunction with the passage of the Transportation, Treasury, Housing and Urban Development, the Judiciary, the District of Columbia, and Independent Agencies Appropriations Act of 2006 (PL 109-115). Senate Report 109-109 stated:

> *In order to improve efforts in addressing homelessness, it is critical for providers and government officials to have reliable data. To address this matter, the Committee began an effort in 2001 that charged the Department to collect homeless data through the implementation of a new Homeless Management Information System [HMIS]. The implementation of this new system would allow the Department to obtain meaningful data on the Nation's homeless population and develop annual reports through an Annual Homeless Assessment Report [AHAR].*
>
> *. . . the Committee strongly urges the Department to ensure full participation by all CoCs in the HMIS effort and consider future CoC funding to be contingent upon participation in HMIS and AHAR.*

In order to fulfill these Congressional directives, HUD contracted with Abt Associates Inc., a private research firm, to develop a process to collect and analyze aggregated HMIS data from communities across the country. A report to Congress has been designed to address the following questions:

- How many people are homeless during a year in the United States?
- Who is homeless?
- What is the nation's capacity to provide housing for homeless persons?
- Where do homeless persons receive shelter?
- What are the patterns of shelter use?

Three Annual Homeless Assessment Reports have been delivered to Congress thus far; the fourth report is currently in preparation.

A2   Information Users

How is the information collected and how is the information to be used?

A.2.1 Annual Performance Report for HUD's Homeless Assistance Programs

The re-designed Annual Performance Report (APR) will be used by HUD's grantees to report on projects funded through HUD's Homeless Assistance Programs, including the Supportive Housing Program (SHP), the Shelter Plus Care (S+C) Program, and the Section 8 Moderate Rehabilitation for Single Room Occupancy Dwellings (SRO) Program. Programs are required to collect data and prepare reports as a condition of funding.

An Annual Performance Report must be submitted for each operating year in which HUD funding is provided. A separate report must be submitted for each HUD grant received. For Shelter Plus Care (S+C) grantees, a separate Performance Report must be submitted for each S+C component (tenant, sponsor, project and single room occupancy rental assistance).

All Annual Performance Reports will be submitted to HUD electronically via *e-snaps*. The data are used by HUD to assess the performance of individual projects and to determine project compliance with funding requirements, including use of HUD funds for approved purposes and procurement of required matching funds. APRs are also aggregated by program type to provide information on overall program performance and outcomes to HUD staff, other federal agencies, the Congress, and the Office of Management and Budget.

Item-by-Item Justification

Detailed justification of each data element requested in the Annual Performance Report is contained in Attachment B.

In general, the re-designed Annual Performance Report covers the following topics:

1. **Grantee Information**—basic information about the grantee and project including the target population, the facility type, the number of beds in the project, and the extent to which data on clients served in the project are entered into the community Homeless Management Information System.
2. **Outputs**—counts of persons and households served, bed and unit utilization rates (for residential programs), and the number of client contacts (for street outreach programs).
3. **Client Characteristics**—information about all clients served in a project by household type and exit status.
4. **Financial Information**—information about project funding and expenditure and matching amounts.
5. **Program Performance**—information on performance measures by program type (for example, Permanent Housing, Transitional Housing, Supportive Service Only Programs, and Safe Havens), as well as information on client progress and performance based on one or more "self-sufficiency" domains, service linkage measures, or optional program-defined measures.

6. **Narrative**—descriptive information about the project and accomplishments.
7. **HMIS-dedicated Projects—**basic information about HMIS implementation.

A.2.2 Annual Homeless Assessment Report (AHAR)

The information collected through the AHAR is used by HUD and the Congress to understand the nature and extent of homelessness, assess the effectiveness of homeless assistance programs, analyze service use patterns, and understand how programs can be improved. As directed by Congress, communities that participate in the AHAR collect client-level data on homeless persons through local Homeless Management Information Systems (HMIS). On an annual basis, they de-duplicate and aggregate this information and produce a report of local data using a standardized template. These aggregated reports are submitted electronically to a private research firm and are the basis for an annual national report on homelessness in the United States. Specifically, the report shows the number of persons experiencing homelessness during a year, the number of persons using shelters and permanent supportive housing, patterns of shelter use, and the characteristics of homeless persons.

For the CoCs gathering and aggregating the data, the local AHAR report is useful in several ways. First, it presents an opportunity to assess the quality of the HMIS data that are collected by homeless assistance providers in each community. Second, the information is useful to understanding homeless clients and service needs at the local level.

Item-by-Item Justification

Detailed justification of each AHAR data collection element is contained in Attachment C. The types of information collected for the AHAR include:

1. **Person Counts**—number of homeless persons served in residential programs at four points in time and over the course of a year.
2. **Demographics**—age, gender, race, ethnicity, household size, veteran status, and disability status of homeless persons served in residential programs.
3. **Prior Living Situation**—living arrangement the night before entering a residential program for persons in families and individuals; length of time in that living situation.
4. **Length of Stay—**number of nights that individuals and persons in families stay in residential programs.
5. **Household Counts**—number of homeless households served in residential programs at four points in time and over the course of a year.
6. **Long-term Stayer Demographics**—age, race, ethnicity, household size, veteran status, and disability status of homeless children and adults that stay in residential programs for more than six months.

A3   Improved Information Technologies

Describe whether, and to what extent, the collection of information is automated (item 13b1 of OMB form 83-i). If it is not automated, explain why not. Also describe any other efforts to reduce burden.

A.3.1   Annual Performance Report for HUD's Homeless Assistance Programs

As described in Section A.2.1 above, HUD has implemented a major improvement in information technologies. Annual Performance Reports are submitted via a web-based reporting tool integrated into HUD's *e-snaps* system. In order to increase the accuracy of the data and reduce burden on grantees, the system will have the following capabilities:

1. ***Some Performance Report information will be pre-filled***. The Performance Report will be linked to information provided on the original application; portions of the Performance Report will be pre-filled with information from these sources.

2. ***Built-in data quality checks***. The *e-snaps* system will check for data consistency and accuracy as grantees and/or project sponsors complete the Performance Report and will identify potential data issues for the user prior to submission.

3. ***Multiple reporting modules***. The web-based Performance Report will contain reporting modules that are specific to each type of grant and program component. Upon entering information about a program's type, the web-based Performance Report will display the questions that apply to that type only. For example, a transitional housing (TH) program will see the performance measures that apply to a TH program only.

4. ***Use of pick-lists or drop-down menus***. The Performance Report will contain drop-down menus where applicable to facilitate reporting and improve data quality.

5. ***Automated calculations***. Rows or columns shaded in grey will be automatically calculated and thus do not require data entry or manual calculations.

6. ***Other key features include***:
   - Secure data entry (128 bit encryption).

   - User login, save/review, and submit—including user registration with authorizing grantee official verification; data entry, review, edit prior to final submission; and data submission date/time stamp.

   - Electronic signature/approval by authorizing grantee and sponsor officials.

   - Navigation to access different sections/tables sequentially or non-sequentially.

   - Help/look-up features—including highlight text linked to Performance Report instructions, definitions, or the HMIS Data Standards; a link to the full Performance Report instructions; and integrated Help Desk support.

- Integrated method for HUD review and approval—including interactive messaging with grantee contact to address questions/corrections; and HUD review and approval date/time stamp with grantee notification.

A.3.2 Annual Homeless Assessment Report

Every effort has been made to reduce burden on communities that develop and submit local AHAR reports based on HMIS data. Most importantly, the AHAR relies on the HMIS standardized data elements, the same data elements that are used to generate HUD's Annual Performance Report. The standardized data elements, which are outlined in the HMIS Data Standards, are collected and electronically maintained by all communities receiving HUD homeless assistance funding regardless of whether they are completing the AHAR. Communities that are developing local AHAR reports can use their existing HMIS to capture all the information needed to complete the local AHAR report without any additional data collection burden.

A web-based data collection tool for AHAR submission has been developed that improves both the efficiency of the collection process and the validity and reliability of the data. Reporting features also add value for communities. This tool—known as the AHAR Exchange—has the following key features:

- *Manual or Automated Data Submission Options.* Communities can manually enter data or can upload data that have been exported as an XML file from their own HMIS.

- *Navigation.* Communities can navigate the data collection system as a survey, or they can use menus to move directly to specific questions.

- *Messaging and Workflow.* Users correspond with HUD's data collection contractor through built-in messaging linked to email. The workflow requires respondents to submit data for review, and for HUD contractors to review the data for errors.

- *Status Tracking.* The database tracks the status of data collection efforts for each participating community and across communities.

- *Validation.* The system validates the data both as the data are entered and in summary validation reports. Data are cross-validated against other data entered by communities to ensure consistency.

- *Notes.* Users can provide notes containing additional context for the data submitted.

- *Reporting.* Built-in reports summarize and extrapolate the data to make the information useful for participating communities.

Additional features include:

- **Sandbox Feature.** A "sandbox" version of the tool is used for training and testing. Communities also use the sandbox for their own local needs.

- **Audit.** The system audits every change to ensure data integrity.

- **Application Security Features.** Data are stored in a secure, professional hosting environment and backed up nightly. Security features include session time out after 15 minutes of inactivity, lockout after 3 successive failed logins, and password change required every 45 days.

- **Section 508 Compliance.** The site is accessible to those with visual impairments.

A4   Duplication of Similar Information

Is this information collected elsewhere? If so, why cannot any similar information already available be used or modified?

The Annual Performance Report for homeless assistance programs is the only annual report that HUD requires programs to submit in order for HUD to monitor project progress.

The Annual Homeless Assessment Report is not duplicative of any information currently available on the topic of homelessness. No other federal effort is under way to collect longitudinal, community-level data on homelessness. This reporting is not duplicative either because no other homeless data are available to HUD on a quarterly basis.

A5   Small Businesses

Does the collection of information impact small businesses or other small entities (item 5 of OMB form 83-i)? Describe any methods used to minimize burden.

No small businesses are involved as respondents to this data collection effort. HUD's Annual Performance Reports are completed by grantees and project sponsors receiving HUD homeless assistance funding.

The local Annual Homeless Assessment Report is completed by local or state governments or nonprofit organizations that represent local Continuums of Care.

A6   Less Frequent Data Collection

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Historically, HUD has used the Annual Performance Report for homeless assistance programs to monitor all homeless assistance projects on an annual basis.   Less frequent data collection would significantly reduce HUD's ability to monitor program performance and ensure compliance with program requirements and federal regulations

With respect to the Annual Homeless Assessment Report, HUD is complying with Congressional directive to collect data on homeless persons on an annual basis. Further, collection of this data on a less frequent basis may compromise the quality of the data that are collected.

A7   Special Circumstances

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320.6 (Controlling Paperwork Burden on the Public—General Information Collection Guidelines). There are no special circumstances that require deviation from these guidelines.

A8   Federal Register Notice/Outside Consultation

Identify the date and page number of the Federal Register notice (and provide a copy) soliciting comments on the information. Summarize public comments and describe actions taken by the agency in response to these comments. Describe all efforts to consult with persons outside the agency.

In accordance with the Paperwork Reduction Act of 1995, the Department of Housing and Urban Development published a notice in the Federal Register on January 14, 2013, vol 78, page 2684 announcing the agency's intention to request an OMB review of data collection activities for the Annual Homeless Assessment Report and the Annual Performance Report for HUD's Homeless Assistance Programs (including the Supportive Housing, Shelter Plus Care, Section 8 SRO). The notice provided a 60-day period for public comments. A copy of the Notice is in Attachment D.

Outside consultations related to the proposed data collection effort are described below.

A.8.1   Annual Performance Report for HUD's Homeless Assistance Programs: Initial Consultation

In the course of re-designing the Annual Performance Report, HUD conducted extensive consultations with staff from HUD headquarters and its field offices and HUD grantees in

August and September 2006. A total of 42 focus groups were conducted in 10 cities nationwide: Baltimore, Boston, Chicago, Denver, Fort Worth, Kansas City, Knoxville, New York, San Francisco, and Seattle. In each city, HUD convened three focus groups with grantees and one focus group with field office staff, except in San Francisco where five focus groups were held with grantees and one focus group was held with field office staff. Most of the participants provided in-person feedback, and some participated via telephone or video conferencing. Overall, more than 500 participants attended the focus groups, including 416 grantees and 86 field office staff.

A.8.2 Annual Homeless Assessment Report

HUD assembled a group of experts on August 27 and August 28, 2002 to provide guidance on the development of an Annual Homeless Assessment Report and data standards associated with that report. Attendees included representatives from CoCs with more advanced HMIS systems, experts from federal agencies that collect data on vulnerable populations (including the U.S. Department of Health and Human Services, the U.S. Department of Justice, and the Office of Management and Budget), researchers on homelessness, advocacy organizations, and providers of technical assistance to communities that have developed HMIS. A list of participants and their affiliations at the time of the meeting is provided in Exhibit A-1 below.

Exhibit A-1: AHAR/HMIS Data Standards Expert Meeting Participants (affiliations as of 8/2002)

1	Jacqueline	Brown	Atlanta Children's Shelter
2	Gloria	Townsend	City of Baltimore Department of Housing Community Development
3	Matthew	Berg	City of Philadelphia Office of Emergency Shelter & Services
4	Barbara	Ritter	City of Spokane Human Services
5	Brooke	Spellman	Consultant / Former City of Chicago Department of Human Services
6	Julie	Williams	Idaho Housing and Finance Association
7	Matt	White	Consultant
8	Nan	Roman	National Alliance to End Homelessness
9	Donald	Whitehead	National Coalition for the Homeless
10	Lyn	Rosenthal	National Network to End Domestic Violence
11	Jill	Berry	New York City Department of Homeless Services
12	Martha	Are	North Carolina Coalition to End Homelessness
13	Tedd	Kelleher	State Washington Office of Community Development - Housing Finance Division
14	Annetta	C. Smith	U.S. Census Bureau
15	Jean	Hochron	U.S. Department of Health and Human Services
16	John	Fanning	U.S. Department of Health and Human Services - HIPPA
17	Fran	Randolph	U.S. Department of Health and Human Services - Homeless Programs Branch
18	Patricia	Carlile	U.S. Department of Housing and Urban Development - CPD
19	Robyne	Doten	U.S. Department of Housing and Urban Development - CPD
20	John	Garrity	U.S. Department of Housing and Urban Development - CPD
21	Mark	Johnston	U.S. Department of Housing and Urban Development - CPD
22	Michael	Roanhouse	U.S. Department of Housing and Urban Development - CPD
23	David	Vos	U.S. Department of Housing and Urban Development - CPD/HOPWA
24	Paul	Dornan	U.S. Department of Housing and Urban Development - PD&R
25	Peter H.	Dougherty	U.S. Department of Veterans Affairs

26	Carol	Coleman	U.S. Federal Emergency Management Agency
27	Clinton	Jones	U.S. House Subcommittee on Housing & Opportunity
28	Philip	Mangano	U.S. Interagency Council on the Homeless
29	Steve	Redburn	U.S. Office of Management & Budget
30	Oscar	Gutierrez	University of Massachusetts - McCormack Institute
31	Michelle	Hayes	University of Massachusetts - McCormack Institute
32	Dennis	Culhane	University of Pennsylvania - CMHPSR
33	Stephen	Poulin	University of Pennsylvania - CMHPSR
34	Martha	Burt	Urban Institute
35	Robert	Rosenheck	Veterans Affairs North East Program Evaluation Center/ Yale University
36	Julie	Hovden	Wisconsin State Division of Housing & Intergovernmental Relations
37	Steve	Berg	National Alliance to End Homelessness
38	Fay	Nash	U.S. Census Bureau
39	Stan	Chappell	U.S. Department of Health and Human Services - Family and Youth Services Bureau
40	Polly	Cooper	U.S. Department of Housing and Urban Development - CPD
41	Susan	Corts	U.S. Department of Housing and Urban Development - CPD
42	Doris	Hill	U.S. Department of Housing and Urban Development - CPD
43	Marty	Horwath	U.S. Department of Housing and Urban Development - CPD
44	Rebecca	Wiley	U.S. Department of Housing and Urban Development - CPD
45	Patrick	Simien	U.S. Department of Housing and Urban Development - OPC
46	Bob	Gray	U.S. Department of Housing and Urban Development - PD&R
47	Jeff	Lubell	U.S. Department of Housing and Urban Development - PD&R
48	Seth	Marcus	U.S. Department of Housing and Urban Development - PD&R
49	Marge	Martin	U.S. Department of Housing and Urban Development - PD&R
50	Kevin	Neary	U.S. Department of Housing and Urban Development - PD&R
51	Rob	Wilson	U.S. Department of Labor
52	Allen	Taylor	U.S. Department of Veterans Affairs
53	Gayla	West	U.S. Interagency Council on the Homeless
54	Francisco	Balicao	U.S. Office of Management & Budget
55	Mary Joel	Holin	Abt Associates Inc.
56	Larry	Buron	Abt Associates Inc.
57	Alvaro	Cortes	Abt Associates Inc.
58	Jill	Khadduri	Abt Associates Inc.

A9   Payment/Gift to Respondents

Explain any payments or gifts to respondents, other than remuneration of contractors or grantees.

HUD does not provide remuneration to grantees for completion and submission of Annual Performance Reports or local AHAR reports.

A10 Confidentiality

Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy.

The Annual Performance Report and the Annual Homeless Assessment Report contain only aggregated data on the number and characteristics of persons receiving homeless assistance services. These reports do not contain any protected personal information.

A11 Sensitive Questions

Justify any questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private.

The Annual Performance Report and the AHAR do not include questions of a sensitive nature for HUD grantees or subgrantees.

A12 Burden Estimate (Total Hours and Wages)

Estimate public burden: number of respondents, frequency of response, annual hour burden. Explain how the burden was estimated.

The exhibits below demonstrate how the public burden for the Annual Performance Report and the Annual Homeless Assessment Report were calculated. The total burden for data collection for both reports over a one year period is estimated at 207,944 hours.

When compared with the last clearance (OMB Approval No. 2506-0145), there is a drop in burden for the Annual Performance Report (from 29.35 hours per program under the current version of the APR, to 28 hours per program under the new automated version of the APR). However, because the AHAR has been added to this clearance, the overall burden will increase.

A.12.1 Burden Estimates for Annual Performance Report for HUD's Homeless Assistance Programs

Exhibits A-2 and A-3 provide information on the estimated time and expenses necessary to compile data and complete the revised Annual Performance Reports for all homeless assistance programs for a one-year period. Total burden for data collection over one year for the Annual Performance Reports is estimated at 182,000 hours. The average annual burden for recipients of HUD Homeless Assistance Program funding (not-for-profit organizations and state and local governments) that complete an Annual Performance Report is 28 hours at a cost of $891.24.

The burden estimates for the re-designed Annual Performance Report represents an overall decrease in respondent burden for recipients of HUD's homeless assistance funds compared to the current Annual Progress Report (OMB Approval No. 2506-0145). The current report had an estimated burden of 234,800 hours for 8,000 homeless assistance providers, or an average estimated burden of 29.35 hours per respondent.

Exhibit A-2: Estimated Annual Burden Hours for Annual Performance Reports

A	B	C	D	E
Recipient Category	**Total Number of Annual Reports**	**Grantee or Subgrantee Burden per Annual Report (Minutes)**	**Total Burden (Minutes)**	**Total Burden (Hours)**
			B*C	D/60
Not-for-Profit Recipients of HUD Homeless Assistance Funding*	3,250	1,680	5,460,000	91,000
State and Local Government Recipients of HUD Homeless Assistance Funding*	3,250	1,680	5,460,000	91,000
Total	**6,500**	**3,360**	**10,920,000**	**182,000**

*Includes Projects funded by the HUD Supportive Housing Program, Shelter Plus Care, and Section 8 Moderate Rehabilitation for Single Room Occupancy Dwellings (SRO) Program.

Exhibit A-3: Estimated Annualized Cost Per Respondent for Annual Performance Reporting

A	B	C	D
Recipient Category	**Total Burden Hours per Annual Report**	**Hourly Wage Rate***	**Total Respondent Costs**
			B*C
Not-for-Profit Recipients of HUD Homeless Assistance Funding	28	$31.83	$891.24
State and Local Government Recipients of HUD Homeless Assistance Funding	28	$31.83	$891.24

*Hourly wage rates are based on the 2007 Occupational Employment and Wages published by the Department of Labor (5/9/08). The hourly wage rates in Exhibit 2 represent the average of "Business Operations Specialists, All Others" ($29.88/hr) and "Data Base Administrators" ($33.78), assuming an equal proportion of hours required to complete the Performance Report per occupational type.

A.12.2 Burden Estimates for the Annual Homeless Assessment Report

HUD expects that every Continuum of Care (CoC) (currently there are 448 CoCs nationwide) will submit a local AHAR report annually that provides a community-level snapshot of the homeless population. In addition, for purposes of monitoring AHAR data quality and data trends throughout the year, HUD is requesting that CoCs also begin to submit AHAR reports quarterly.

The effort involved in completing the AHAR report will vary from community to community depending on technology used and staff capacity. Fortunately, most communities now use systems that are able to produce automated reports. A relatively small number of communities must manually run reports to extract data for the AHAR. For this reason, the estimated annualized burden estimate is divided into two categories: 1) communities that use their HMIS software systems to produce automated reports; and 2) communities that must manually run reports to extract AHAR data.

The burden estimates for each group are as follows:

- Group 1: Communities with automated reports: 16 hours for the annual report plus 8 hours for each quarterly report. A total of 48 hours per community per year.

- Group 2: Communities that must manually run reports: 24 hours for each annual report plus 16 hours for each quarterly report. A total of 88 hours per community per year. Note that these are averages. Communities will spend more time in programming the initial report. Once it is programmed, the number of hours required to complete the report will be less.

The burden estimate for all 448 CoCs is outlined in Exhibit A-4. The total number of hours required to produce and submit local annual and quarterly AHAR reports is 25,944. It should be noted that the first time a CoC participates in the AHAR is the most burdensome. Once a community has contributed data, the burden will be reduced because the process will vary little from year to year. Additionally, the burden will be reduced as more software vendors develop automated AHAR reporting features.

Exhibit A-4: Estimated Annualized Burden Hours for the Annual Homeless Assessment Report

A	B	C	D	E
CoC Category	Number of Respondents	Number of Responses per Year	Average Burden per Respondent	Total Burden Hours
				B*D
Group 1: CoCs with Automated Software Report	425	1 annual 4 quarterly	48	20,400
Group 2: CoCs with Manual Software Report	63	1 annual 4 quarterly	88	5,544
Total	488			25,944

Exhibit A-5 provides estimates of annualized cost to respondents for the hour burdens for collection of information. The estimated annualized cost for a CoC that has software with an automated AHAR report function (Group 1) is $1,527.84. The estimated annualized cost for other CoCs (Group 2) is $2,801.94.

Exhibit A-5: Estimated Annualized Cost per AHAR Respondent

A	B	C	D
CoC Category	Average Burden Per Respondent	Hourly Wage Rate*	Total Costs per Respondent
			B*C
Group 1: CoCs with Automated Software	48	$31.83	$1,527.84

A	B	C	D
CoC Category	**Average Burden Per Respondent**	**Hourly Wage Rate***	**Total Costs per Respondent**
Report			
Group 2: CoCs with Manual Software Report	88	$31.83	$2,801.04

*Hourly wage rates are based on the 2007 Occupational Employment and Wages published by the Department of Labor (5/9/08). The hourly wage rates in Exhibit 5 represent the average of "Business Operations Specialists, All Others" ($29.88/hr) and "Data Base Administrators" ($33.78), assuming an equal proportion of hours required to complete the AHAR per occupational type.

A13 Capital Costs

Estimate the annual capital cost to respondents or record keepers.

There are no capital costs for respondents beyond customary or usual business practices or that are not otherwise required to achieve regulatory compliance not associated with the collection of information for purposes of completing the Annual Performance Reports or the Annual Homeless Assessment Report.

A14 Cost to the Federal Government

Estimate annualized costs to the Federal government.

The federal costs associated with the Annual Performance Reports are accounted for as part of overall program oversight and management. It is not possible to separate out any specific costs attributed to the data collection effort that are borne by the government.

HUD contracts with a private research firm to collect and analyze local Annual Homeless Assessment Report data, prepare a yearly report, and prepare quarterly interim updates. The estimated annual contractor cost is $700,000. The activities that are covered in this estimate include: conducting outreach to communities to participate in the AHAR process; providing technical assistance to communities to prepare for the AHAR and to submit their data; cleaning and analyzing the data; and preparing the reports.

A15 Program or Burden Changes

Explain any program changes or adjustments in burden.

This submission to OMB includes a request for approval of an automated version of the Annual Performance Report that will incorporate continued annual reporting on HUD's competitive Homeless Assistance Programs. The automated version of the Annual Performance Report replaces the former paper version (OMB Approval No. 2506-0145). The change in overall

respondent burden *for Homeless Assistance Programs* decreases from 29.35 hours per program under the current version of the Annual Progress Report, to 28 hours per program under the new automated version.

The AHAR data collection effort does not necessitate the collection of any additional information from homeless clients in a community. The community will aggregate client-level data that they are already required to collect for Performance Reports.

A16 Publication and Tabulation Dates

If the information will be published, outline plans for tabulation and publication.

A.16.1 Annual Performance Report for HUD's Homeless Assistance Programs

Annual Performance Report data will be entered and stored in the *e-snaps* system. HUD staff will review and assess each Annual Performance Report individually to determine compliance with HUD regulations and grantee agreements. Aggregated data from the Annual Performance Reports will be used to report to Congress, OMB, and other stakeholders on program performance on an as requested basis.

A.16.2 Annual Homeless Assessment Report

The data collection period for the AHAR is October 1st to September 30th of each year. During this period, homeless assistance providers capture and record information about the homeless persons in their community using homeless services. At the CoC level, staff members work to ensure that providers submit data on every client served and that they submit all of the information on each client that is required. The providers typically update this information on a monthly basis. The monthly data will be aggregated to provide three-month snapshots for data quality assessments and to provide HUD with recent data on homelessness trends.

Once the annual data collection period ends on September 30th, data are submitted by providers to the CoC where an annual community level report is developed and submitted to HUD's research contractor using a web-based system. Following the review of data, analysis and report writing commences by early January. Pending HUD review and approval, the AHAR report is released to Congress in the spring of each year. HUD expects that when the report is released it will be published on HUD's website. It will also be publicly available once delivered to Congress.

1.1.1. A17 Expiration Date

Explain any request to not display the expiration date.

The OMB expiration date will be displayed on all data collection instruments. No exceptions are requested.

1.1.2.　A18　Certification Statement

Explain each exception to the certification statement identified in item 19.

There are no exceptions to the certification.