

I have returned this collection as improperly submitted so that HUD can work on the issues off the clock. This collection was in violation of the PRA before I returned it so this does not affect its approval status. Here are the questions/issues:

During the call a few weeks ago, I recall HUD saying it plans to update the sampling procedure for the AHAR in the near future. Is that correct and when does HUD expect to complete this effort?

Supporting statement A (SSA) says HUD re-designed the APR. Please list all of the changes to the APR in SSA question 1. Also, are there any changes to the AHAR? If not, please say so in SSA 1; if so, please list all of the changes in SSA 1.

The first paragraph in SSA says there are no revisions to this collection ("*This package is being extended without revisions.*"), but in other places it says there are revisions (do a word search for "re-design"). Please make sure SSA is consistent throughout.

Please revise A5 to address small entities not just small businesses. The response should address what, if anything, HUD does to minimize burdens on small government entities and nonprofit entities, whom this collection affects.

The burden estimate for the AHAR should cover the burden for homeless persons to provide the information requested in the AHAR (i.e., the information requested in the Universal Data Elements and the Program Specific Data Elements, i.e., name, SSN, race/ethnicity, veteran status, disabled, housing status, income, substance abuse, domestic violence, etc etc etc. ). HUD has advised that this burden is captured under a different collection. If so, please point me to the specific place in which this burden is accounted for.

There are two APR's in the IC section of ROCIS. One should be deleted when you resubmit. Also, the AHAR is not uploaded into the IC section. Please include one APR and one AHAR in the IC section and provide a burden estimate in ROCIS for each IC separately.

The previous terms of clearance state: HUD and OMB agree that, because of the differences in the definition of disabled used in HMIS data standards and that used by the Federal statistical agencies, it would not be appropriate in the AHAR to draw comparisons between the percent of disabled in the general population and the percent of disabled in the homeless population using these data. Has HUD made any revisions in response to these TOC's?

Finally, I would suggest providing an optional template form that grantees can use to collect the AHAR information. That could help ensure collected data are uniform. For example, that could help to ensure grantees collect race and ethnicity info consistent with the OMB standards.