

Supporting Statement for Paperwork Reduction Act Submissions

Multifamily Housing Service Coordinator Program

OMB Control Number 2502-0447

(HUD-92456, HUD-92456-G, HUD-50080-SCMF, HUD-91186, SF-424, SF-424-Supp, HUD-2880, SF-LLL, HUD 96010, HUD-91186-A)

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

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.

This request seeks revision of a currently approved collection for the Service Coordinator Program. The change to the previous submission is the revision of form HUD-92456, “Semi-annual Performance Report”.

This change, in addition to yearly appropriations allowing for new grant awards, will increase the number of respondents, number of burden hours, and Dollar amounts.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

HUD Field office staff use grant applications to determine an applicant’s need for and capacity to administer grant funds. Field staff evaluate 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 receive, 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-425, Federal Financial Report, 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 determine 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 Accountability 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 Federal Financial 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 performance reporting. Applicants submit this form with the initial application and grantees report performance outputs and outcomes semi-annually or annually thereafter.

Form HUD-92456, Semi-Annual Performance Report (along with HUD-92456-G, "Glossary of Service Types), 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. By 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.

This submission revised the form HUD-92456, by adding new data and clarifying existing questions. In particular Service Coordinators are asked to report the number of residents who have received a service through the assistance of the Service Coordinator. We are adding the number of contacts for each resident, as this better demonstrates the nature of the work performed by the Service Coordinator. We added a question to collect data on aging-in-place and independent living, which are the ultimate goals of the program.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Applicants can only complete and submit grant applications electronically through www.grants.gov. Required reports and other forms can be completed using electronic files and be submitted in hard copy or in electronic form. Grantees can submit extension requests in hard paper copy or by electronic mail.

HUD is making plans for use of a computerized management information system. Such a system will allow Service Coordinators to complete the Semi-Annual Performance Report electronically and then transfer the data electronically to HUD. As a result, HUD will then have immediate access to all data entered on these reports. We anticipate creating this system in FY 2014 or 2015.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

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 Federal Financial and performance reports and on the 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 and to identify and report on program performance measures. There is currently no one mechanism to collect and record this information.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

This collection will not have a significant economic impact on small businesses or other small entities.

6. 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.

The required reports and forms 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. Explain any special circumstances that would cause an information collection to be conducted in a manner:

There are no special circumstances involved in this collection.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.

Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

In accordance with 5 CFR 1320.8(d), this information collection soliciting public comments was announced in the Federal Register on November 15, 2012 (Volume 77, Number 221, Page 68139 and 68140).

No comments were received regarding cost and hour burden, availability of data, frequency of collection, and disclosure.

Comments submitted primarily recommended clarification of a number of items and deletion of duplicative or unhelpful data. Some comments recommended additions to the subparts of each item and were added where appropriate. HUD's Office of Fair Housing and Equal Opportunity reminded us to emphasize the assurance of fair housing, civil rights, and availability of documents in alternative formats and translations. Comments also indicated need for clear instruction to the form and consistent definition of terms in the HUD-92456-G.

Positive comments were provided regarding the new Glossary of Service Types. Commenters felt the definitions would help them more specifically categorize and report the types of services coordinated for the residents.

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 over time 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 agents/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) that HUD consulted with by telephone, meetings, and/or workshop sessions:

- American Association of Service Coordinators
- Volunteers of America

- National Church Residences
- Leading Age

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

HUD does not provide any payment or gift to respondents.

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

There have been no assurances of confidentiality provided to respondents.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature are part of the Service Coordinator Program.

12. Provide estimates of the hour burden of the collection of information.

- HUD anticipates 250 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.
- There are currently 1,870 grantees.
- Of the current grantees, 1,400 are expected to submit annual extension requests.
- There are 2,430 projects that are not grantees of this program but that have Service Coordinators paid for with HUD funds, and must file the Performance Report.
- Grantees receiving awards in FY 2009, 2010, and 2012 will be required to submit the Logic Model report, HUD-96010 annually.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hours Per Response	Annual Burden Hours
Grant Application (includes HUD-91186, SF-424, SF-424 Supplement, SF-LLL, HUD-2880, HUD-96010)	250	1	250	40	10,000
Grant Agreement	100	1	100	0.5	50
HUD-96010 Logic Model annually	500	1	500	2	1,000

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hours Per Response	Annual Burden Hours
Grant Extension Request form HUD-91186-A	1,400	1	1400	2	2,800
Performance Report HUD-92456	4,300	2	8600	4	34,400
LOCCS Payment Voucher HUD-50080-SCMF	1,870	4	7480	0.25	1,870
Federal Financial Report SF-425	1,870	2	3740	2	7,480
Totals	10,290		22,070		74,800

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 programs funded with project funds (i.e. rent subsidies).

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

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)	250	4	1000	\$32.97	\$32,970
Grant Agreement	100	1	100	\$32.97	\$3,297
HUD-96010 Logic Model annually	500	1	500	\$32.97	\$16,485
Grant Extension Request form HUD-91186-A	1,400	1	1400	\$32.97	\$46,158
Performance Report HUD-92456	8600	0.5	4300	\$32.97	\$141,771
LOCCS Payment Voucher HUD-50080-SCMF	7480	0.5	3740	\$32.97	\$123,308
Federal Financial Report SF-425	3740	0.5	1870	\$32.97	\$61,654
Totals	22,070	-	12,910	-	425,643

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

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

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16. For collections of information whose results will be published, outline plans for tabulation and publication.

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

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

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

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

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.