

## **Supporting Statement for Paperwork Reduction Act Submissions**

**Title:** Congregate Housing Services Program (CHSP)

**OMB Control Number:** 2502-0485

**(HUD-90003, HUD-90006, HUD-90198, HUD-91180-A, 91178-A, SF-425)**

### **A. Justification**

This request seeks extension of a currently approved collection for the Congregate Housing Services Program (CHSP). This package seeks approval for the same information collection and reporting requirements listed in the last approved package. Burden hours and dollar amounts will decrease slightly, due to a lower number of grant recipients.

- 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.**

The information is basic to the ongoing operations of the Congregate Housing Services Program (CHSP). It supports statutory requirements and program and management controls that prevent fraud, waste, and mismanagement. The controls must be maintained as long as current grants are in operation. Section 802(i)(1)(A) and (d)(7) of the National Affordable Housing Act authorizes/requires matching funds and participant fee collections that are reported on the Summary Budget form (HUD-91180-A) and the Annual Program Budget (HUD-91178-A). The CHSP rule at 24 CFR 700.155(d) requires grantees to submit those forms required by the Secretary, which are included in the CHSP Handbook 4640.1.

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 need for funds and effectively monitor grantees' program administration. In addition, the information collection will assist grantees in better determining their need for future funds and will enable them to more effectively account for funds and maintain appropriate program records.

- 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.**

Field Office staff use the annual Summary Budget (HUD-91180-A) and the Annual Program Budget (form HUD-91178-A) to assure that grant funds are being used properly. This includes grantees' expense of appropriate grant moneys during each annual grant period; use of grant funds to provide eligible activities to eligible residents, and to assure that statutory and regulatory requirements are being met.

HUD Field staff will review semi-annual Federal Financial Reports, SF-425, in order to monitor the proper use of grants 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 find 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.

HUD Field staff will also review the LOCCS Payment Voucher in order to monitor use of funds for eligible activities. Grantees submit these forms on a quarterly basis. This allows the Field staff to track expenses and draw-down of funds for eligible activities at intervals within the grant term. These funds are taken as reimbursements and are obtained through use of either a telephone voice response system or an electronic online system. Grantees are required to submit this form following their request. 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.

HUD Field staff will review the Annual Report, (HUD-90006), to evaluate the effectiveness and efficacy of grant-funded activities. The staff will compare budgets with realized results. If Performance Reports indicate poor administration of funds or activities; funds spend 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 funds or levying other administrative or legal penalties.

Headquarters program staff use Annual Reports to compile annual program data for internal and external reports when requested.

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.**

Grantees may scan the reports and email them as PDFs to the local field office. They also may complete the report in a PDF fillable format if it is available. They can also request grant funds through the electronic online Line of Credit Control System (LOCCS). However, in an effort to automate where possible the forms used for this program are PDF fillable and available electronically on HUDCLIPS.

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.

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 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.**

If information collection is not conducted as required, the Department will not be able to monitor proper use of grant funds according to statutory, regulatory, and administrative requirements, thereby losing the ability to most expediently prevent fraud, waste, and mismanagement. Grantees are required by law to provide a percentage of matching funds and to collect a percentage of program costs from participant fees. Less than annual information collection would deter Field office staff from assuring that grantees meet these annual requirements. In addition, less frequent reporting will not allow grantees to meet minimum grant reporting requirements of OMB circulars.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- requiring respondents to report information to the agency more than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

None.

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.**

The staff has discussed reporting requirements with at least three existing grantees to solicit their comments on the requested information collection. Notice was published in the Federal Register on September 3, 2014, Volume 79, Number 170, and Page 52351, Comments 0.

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

None

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

Since confidential information is not reported as part of the CHSP, no assurance of confidentiality is needed.

**11. No questions of a sensitive nature are part of the CHSP.**

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally estimates should not include burden hours for customary and usual business practices.**
- **if this request covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I; and**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 14.**

**Insert Table A - Estimated Number of Respondents, Responses, and Burden Hours Per Annum**

The estimated numbers of burden hours are based on discussions with HUD Field staff and current CHSP grantees.

### Estimates of Annualized Cost to Respondents

Estimated Number of Respondents, Responses, and Burden Hours Per Annum					
	Respondents	Responses per Annum	Total Responses	Burden Hours	Total Hours
Annual Grant Extension Request package (includes forms HUD-91180-A & HUD91178-A))	49	1	49	3.5	171.5
Annual Report	49	1	49	4	196
LOCCS Payment Voucher	49	4	196	0.25	49
Federal Financial Report, SF-425	49	2	98	2	196
<b>Total</b>	<b>49</b>	<b>8</b>	<b>392</b>	<b>9.75</b>	<b>612.5</b>

Estimates of Annualized Cost to Respondents			
	# Hours	Cost per Hour*	Total Cost

Annual Grant Extension Request package (includes forms HUD-91180-A & HUD91178-A)	171.5	\$25.00	\$4,287.50
Annual Report	196	\$25.00	\$4,900.00
LOCCS Payment Voucher	49	\$25.00	\$1,225.00
Federal Financial Report, SF-425	196	\$25.00	\$4,900.00
Total	612.5	\$25.00	\$15,312.50

\* The hourly cost is based on an average annual salary of \$52,000.

\$50,003.20

13. **Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information (do not include the cost of any hour burden shown in Items 12 and 14).**
- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;**
  - **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
  - **Generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices.**

The estimate of the total annual cost burden to respondents does not vary from the numbers presented in item #12. There is no capital and start-up cost component in the CHSP.

14. **Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

Insert Table C Estimates of annualized cost to the Federal government

Estimates of annualized cost to the Federal government					
	Responses	Hours per Response	Total Hours	Cost per Hour*	Total Cost
Annual Grant Extension Request package (includes forms HUD-91180-A & HUD91178-A))	49	3	147	\$36.54	\$5,371
Annual Report	49	1	49	\$36.54	\$1,790
LOCCS Payment Voucher	196	0.5	98	\$36.54	\$3,581
Federal Financial Report, SF-425	98	0.75	73.5	\$36.54	\$2,686
<b>Total</b>	<b>392</b>	<b>5</b>	<b>\$368</b>	<b>\$36.54</b>	<b>\$13,428</b>

\* Based on an average annual salary of \$76,000.

\$35.19
\$35.19
\$35.19

\* Based on an average annual salary of \$75,000.

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

There are currently 55 active grants, eight less than in 2004 (total was 63). This is due to closing of several programs and consolidation of grants by grantees that had multiple grants. Burden hours and dollar amounts will decrease slightly, due to a lower number of grant recipients.

This reduced the overall hours needed to review program documents and also reduced the total cost to the Federal government.

We are requesting a revision of a currently approved collection.



- 16. For collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

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.**

Not seeking such approval.

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

No exceptions requested.

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

None