

Justification Supporting Statement for Paperwork Collection Efforts Housing Opportunities for Persons With AIDS (HOPWA) Program

Summary

The currently approved HOPWA paperwork collection documents expire on October 31, 2014, under OMB Control Number 2506-0133. HUD is requesting an extension, without change, of a currently approved collection. An additional three year approval period is requested.

The HOPWA documents are comprised of the following: (1) project budget summary form for competitive grant applications (*HOPWA Competitive Application and Renewal of Permanent Supportive Housing Project Budget Summary*), HUD-40110-B; 2) annual grantee performance reporting requirements for the HOPWA competitive program inclusive of the permanent supportive housing renewal grants (*Annual Progress Report (APR) Measuring Performance Outcomes*), HUD-40110-C; and (3) annual grantee performance reporting requirements for the HOPWA formula program (*Consolidated Annual Performance and Evaluation Report (CAPER) Measuring Performance Outcomes*), HUD-40110-D.

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 individual grantee and aggregate national HOPWA program performance data. Investment in technical assistance and training to HOPWA grantees and program sponsors on existing performance reporting requirements continue to sustain timely and complete reporting. The Department has determined that is not necessary to revise these forms at this time. The performance data collected through the formula and competitive programs is used to report on HUD strategic management goals and objectives and to provide grantees and the general public with local HOPWA program performance through dissemination of performance profiles compiled for each formula and competitive grantee available at www.onecpd.info. In addition, these forms enable the Department to provide HUD updates to the President's National HIV/AIDS Strategy and HIV Continuum of Care recommendations. The budget summary form is utilized for soliciting new competitive grant applications and remains current.

A. Justification

1. HOPWA Competitive Application and Renewal of Permanent Supportive Housing Project Budget Summary), HUD-40110-B.

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. This form is used annually as part of the renewal grant process which is outlined within a HUD memorandum issued to all eligible and expiring renewal grant applicants. 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.

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

There are no proposed changes to the formula and competitive grant performance reports. 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, HOPWA IDIS is not functionally programmed to record performance outcomes for HOPWA formula grantees and for consistent collection of data elements approved for existing program collection authority.

3. HUD-40110-B, budget summary form is provided through a HUD memorandum to eligible renewal grant applicants. When the Department issues a Notice of Funding Availability (NOFA) for new competitive grant applications, the form is available through www.grants.gov.

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. All formula and competitive reports are submitted electronically.

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 continues its information and technology investment to enhance IDIS HOPWA program screens that work towards a possible on-line performance data system that would make the current paper-based

reporting obsolete. However, current IDIS methodology for financial reporting (first-in first-out FIFO) does not comply with Generally Accepted Accounting Principles (GAAP), HUD, and Treasury statutory requirements. This retooling of IDIS financial principles commencing with fiscal year 2015 formula allocation awards is likely to retard other investments and timeframes to continue enhancing HOPWA program and reporting functionality within IDIS.

4. No changes are proposed and no further actions are necessary.

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 commitment remains to continue to identify and reduce grantee reporting burdens.

6. Information on the existing competitive grant application project budget form is used in consideration with the rest of the submitted grant 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 renewing expiring renewal grant 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 in the *Federal Register* on July 25, 2014, vol 79 page 43497 a Notice to solicit public comment on this proposed action to extend the use of these forms without change. Comments due on September 23, 2014.

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)	92	1	92	56	5,152
40110-D Consolidated Annual Performance and Evaluation Report (CAPER)	126	1	126	42	5,292
Total	253	1	253		10,864

Note: The number of respondents who submit HUD-40110-D, CAPER, is changed from the existing reported number of 125 to 126. In addition, the number of respondents who submit HUD-40110-C is changed from 96 to 92. These changes are representative throughout the total hours and associated costs.

Hourly cost estimate of \$23 x 10,864 hours = \$249,872 – a net decrease of (\$4,186).

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 submissions and grant agreements	25	24	600	40	24,000
Review and analysis of APR and CAPER performance reports	92/126	16/12	1,472/1,512	40	58,880/60,480
Submitted amendments	72	6	432	40	17,280
Website posting of grantee performance results and accomplishment summaries	218	4	872	40	34,880
Uniform relocation act appeals	2	4	8	40	320
Environmental review recordkeeping	10	12	120	40	4,800
Total of projected administrative costs:	580		5,444		\$217,760

Hourly cost estimate of \$40 x 5,444 = \$217,760.

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) have been slightly reduced to reflect a net decrease in respondents (see explanation provided as note under item 12 above). It is projected that the proposed revisions will slightly decrease the overall burden requirement as shown below:

Existing Burden Hours:	11,046
Revised Burden Hours:	10,864
Net Change:	-182
Adjustment: Decrease	-182

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.