

Supporting Statement for Paperwork Reduction Act Submissions

Multifamily Housing Service Coordinator Program OMB Control Number 2502-0447

HUD-2530, HUD-92456, HUD-92456-G, HUD-91186, HUD-91186-A, SF-424, SF-424-Supp, HUD-2880, SF-LLL, SF-425, Revised 50080 for PRA 7-9.xlsx

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.”

The Department of Housing and Urban Development (herein referred to as the Department/HUD) has issued an interim new regulation for the Service Coordinator program, 24 CFR Part 892. Since the rule is not yet final, the information presented in this paperwork burden package is required, for the most part, by administrative decision and written directive. The new 2 CFR part 200, “Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards” will also regulate all existing Service Coordinator grants starting in Fiscal Year (FY) 2016.

The collection of information is necessary to ensure efficient and proper use of funds for eligible activities. Without this information, 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 approval for two documents as follows:

1. Revision of form HUD-50080-SCMF, and
2. Upcoming Notice of Funding availability (NOFA) for the Seniors and Services Demonstration program.

The request also proposes to eliminate the use of standard form (SF) 425 “Federal Financial Report” and form HUD-96010 “Logic Model”. These changes will decrease the number of respondents, responses, number of burden hours, and Dollar amounts.

Seniors and Services Demonstration Program:

This provision of the Consolidated Appropriations Act, 2014, gives the Department broad authority to use available funds for a Demonstration program. Specifically, the Consolidated Appropriations Act, 2014 provided that amounts deposited in the Elderly Housing account pursuant to the previous proviso shall be available in addition to the amounts otherwise provided by this heading for the purposes authorized under that heading and, together with such funds, may be used by the Secretary for demonstration programs to test housing with services models for the elderly that demonstrate the potential to delay or avoid the need for nursing home care.

Using this demonstration authority, the Department is exploring innovative approaches to ensure that affordable rental housing with strong supportive service models delay or prevent nursing home care is made available for very-low to extremely low income elderly persons. The eligible applicant pool for this program will be aligned with the Service Coordinator for Multifamily Housing program. This paperwork package provides the grant application intake submission requirements for the Demonstration.

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 HUD-2530, Previous Participation Certification. This form must be submitted for all of the Officers and Directors of the Board of the Sponsor, including any Co-Sponsor, if applicable. This form provides HUD with a certified report of all your previous participation in HUD multifamily housing projects. The information is used to determine if the fund recipient meet the standards established to ensure that all principal participants in HUD projects will honor their legal, financial, and contractual obligations and are acceptable risks from the underwriting standpoint of an insurer, lender or governmental agency.
- 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.

The proposed revised Form HUD-50080-SCMF, LOCCS Payment Voucher/Expense Report , 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 will submit this form/report on a semi-annual basis. The data reported will allow the Field staff to track expenses and drawdown of funds for eligible activities at intervals within the grant term.

The grantee will use the 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 2 CFR Part 200. Doing so will also help both the grantee and HUD better monitor use of funds.

Grant funds are taken as reimbursements and are obtained through use of the online LOCCS system. Grantees are required to draw down from LOCCS monthly or quarterly. They will complete one worksheet per draw down. Each worksheet will list every expense incurred during that month or quarter. Grantees will also indicate whether costs were paid during that time period. This will provide accrual accounting information that may be reported on the SF-425.

If this report indicates unusual, delinquent, or improper use of funds, HUD can suspend LOCCS payments until such problems are corrected.

If HUD staff determine that funds have been improperly used, they may impose sanctions including funds recapture or repayment.

HUD proposes to substitute the revised form HUD-50080-SCMF for the SF-425, "Federal Financial Report". The SF-425 does not provide HUD with any data that is not already available in LOCCS or that will be reported in the revised HUD-50080-SCMF. The SF-425 is difficult for grantees to complete. As a result, many don't submit it or, if they do, the data reported is not reliable. As a result, HUD field staff are not provided with valid and useable data that enable them to monitor grant activity. The completion and review of the report is therefore overly burdensome for both grant recipients and HUD staff and it provides neither party with helpful data. The revised HUD-50080-SCMF, on the other hand, provides the most essential information HUD needs to determine whether federal funds have been used appropriately. The form and modified submission schedule are designed to reduce burden and strengthen the valid data provided to HUD.

Form HUD-92456, Semi-Annual Performance Report, is required for each assisted Multifamily housing project designated for the elderly and/or people with disabilities that has Service Coordinators paid for with HUD funds. HUD requires one report semi-annually for each Service Coordinator position.

Using the Semi-Annual Performance Report 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.

HUD Field staff will review semi-annual Performance Reports to evaluate the effectiveness and efficacy of grant-funded activities. The staff will compare proposed programs and objectives with realized results. If Performance Reports 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.

HUD also proposes to eliminate the form HUD-96010. This form has also been difficult for grantees to complete and submit to HUD, due to various electronic technical issues. Many grantees were unable to submit the form. As a result, HUD was unable to access data from enough reports to be used effectively to monitor program performance. The HUD-92456, Semi-Annual Performance Report, provides more relevant and useable data on program performance. HUD requires and uses the performance data provided on this report. The HUD-96010 was not helpful and was quite burdensome for the small number of grantees who managed to complete it.

The submission requirements for the newly authorized demonstration program will be consistent with that of the traditional Service Coordinator 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. Grantees will be required to submit Forms HUD-91186-A, 50080-SCMF, and 92456 in electronic format and send them to HUD via electronic mail. Exceptions will be made for grantees without computer or Internet access and users with disabilities needing reasonable accommodations. Except for these cases, HUD will no longer accept hard copy paper reports starting in FY 2016.

- 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 data provided on forms HUD-92456 and HUD-50080-SCMF are not discreetly available for the Service Coordinator program at particular sites. The information collected on these reports is not available through any other mechanism. The information provided on the SF-425 is duplicative and so we propose to eliminate that report.

- 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 5CFR 1320.8(d), this information collection soliciting public comments was announced in the Federal Register on April 28, 2015, Volume 80, No. 81, Pages 23564. (2) Comments received.

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.

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
- Of the 200 applicants, HUD expects 100 new grant recipients. Only these new grantees will be required to sign the Grant Agreement.
- There are currently 1,720 grant recipients.
- Of the current grantees, 1,400 are expected to submit annual extension requests.
- There are 2,580 Multifamily Housing projects that have a Service Coordinator paid for with non-grant HUD funds. Service coordinators at these sites are also required to submit the form HUD-92456.

The estimated number of burden hours is based on experience and also discussions with Service Coordinators, their supervisors, and industry advocates.

Information Collection	Number of Respondents	Frequency of Response	Total Annual Responses	Hours per Response	Total Hours
Grant Application:					
(a) SF-424 - Application for Federal Assistance	250	1	250	0.75	187.50
(b) SF-424- Supplemental, Survey on Ensuring Equal Opportunity for Applicants	250	1	250	0.30	75.00
(c) SF-LLL - Disclosure of Lobbying Activities	250	1	250	0.17	41.68
(d) HUD-2880 - Applicant/Recipient Disclosure/Update Report(2510-0011)	250	1	250	2.00	500.00
(e) HUD-91186- Multifamily Housing Service Coordinator First-Time Funding Request	250	1	250	4.00	1000.00
(f) Form HUD-2530, Previous Participation Certification	250	1	250	32.97	8242.50
(g) Narrative description of evidencing need for supportive housing	250	1	250	32.97	8242.50
(h) Narrative description of evidencing provision of Supportive Services	250	1	250	32.97	8242.50
(i) Evidence of comparable salaries for Service Coordinators	250	1	250	32.97	8242.50

Post Selection:					
Grant Agreement	100	1	100	1.00	100.00
Grant Extension Request form HUD-91186-A*	1,400	1	1400	1.00	1400.00
Performance Report HUD-92456*	4,300	2	8600	1.00	8600.00
LOCCS Payment Voucher HUD-50080-SCMF*	1,720	4	3440	0.50	1720.00
Totals	9770	17	15,790		46,594.18

* Number of respondents includes existing inventory or service coordinators

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	Hours per Response	Total Hrs	Cost per Hour	Total Cost
Grant Application:					
(a) SF-424 - Application for Federal Assistance	250	0.75	187.5	\$32.97	\$6,181.88
(b) SF-424- Supplemental, Survey on Ensuring Equal Opportunity for Applicants	250	0.3	75	\$32.97	\$2,472.75
(c) SF-LLL - Disclosure of Lobbying Activities	250	0.1667	41.675	\$32.97	\$1,374.02
(d) HUD-2880 - Applicant/Recipient Disclosure/Update Report(2510-0011)	250	2	500	\$32.97	\$16,485.00
(e) HUD-91186- Multifamily Housing Service Coordinator First-Time Funding Request	250	4	1000	\$32.97	\$32,970.00
(f) Form HUD-2530, Previous Participation Certification	250	1	250	\$32.97	\$8,242.50
(g) Narrative description of evidencing need for supportive housing	250	1	250	\$32.97	\$8,242.50
(h) Narrative description of evidencing provision of Supportive Services	250	1	250	\$32.97	\$8,242.50
(i) Evidence of comparable salaries for Service Coordinators	250	1	250	\$32.97	\$8,242.50
Grant Agreement*	100	1	100	\$32.97	\$3,297.00
Grant Extension Request form HUD-91186-A*	1,400	1	1400	\$32.97	\$46,158.00

Performance Report HUD-92456*	8600	0.5	4300	\$32.97	\$141,771.00
LOCCS Payment Voucher HUD-50080-SCMF*	3,440	0.5	1720	\$32.97	\$56,708.40
Totals	15,790		10324		\$340,388.05
<i>* Number of respondents includes existing inventory or service coordinators</i>					

*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.

This is revision of a currently approved collection. There are some changes.

- Number of respondents increased d from 10,290 to 9,770.
- Total annual responses decreased from 22,070 to 15,790.
- Percentage of these responses collected electronically changed to 100%.
- Total annual hours requested decreased from 74,800 to 46,594.18. The difference is a reduction of 28,205.82 hours.

The reduced numbers are due to the elimination of the SF-425 and form HUD-96010. The number of grant recipients was also adjusted to the current accurate number.

It’s been determined that all program submissions are available and can be completed in an electronic file. Most recipients now have the ability to complete electronic forms and send them by electronic mail to HUD. That is why the percentage of items submitted electronically has increased to 100%.

This submission now accounts for the newly authorized Seniors and Services Demonstration for which the department expects to issue a Notice of Funding Availability by Summer of FY 2015.

The request proposes to eliminate the use of the following forms largely because they are duplicative and provide little value to this program:

Standard form (SF) 425 “Federal Financial Report” . HUD proposes to substitute the revised form HUD-50080-SCMF for the SF-425, “Federal Financial Report”. The SF-425 does not provide HUD with any data that is not already available in LOCCS or that will be reported in the revised HUD-50080-SCMF. The SF-425 is difficult for grantees to complete. As a result, many don’t submit it or, if they do, the data reported is not reliable. As a result, HUD field staff are not provided with valid and useable data that enable them to monitor grant activity. The completion and review of the report is therefore overly burdensome for both grant recipients and HUD staff and it provides neither party with helpful data. The revised HUD-50080-SCMF, on the other hand, provides the most essential information HUD needs to determine whether federal funds have been used appropriately. The form and modified submission schedule are designed to reduce burden and strengthen the valid data provided to HUD.

Form HUD-96010 “Logic Model”. This form has also been difficult for grantees to complete and submit to HUD, due to various electronic technical issues. Many grantees were unable to submit the form. As a result, HUD was unable to access data from enough reports to be used effectively to monitor program performance. The HUD-92456, Semi-Annual Performance Report, provides more relevant and useable data on program performance. HUD requires and uses the performance data provided on this report. The HUD-96010 was not helpful and was quite burdensome for the small number of grantees who managed to complete it. Form HUD-92456, Semi-Annual Performance Report, is required for each assisted Multifamily housing project

designated for the elderly and/or people with disabilities that has Service Coordinators paid for with HUD funds.

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

Collection of this information will not be published. However, a list of new awardees will be made public, upon completion of selection process.

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.