



SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL UNDER THE PAPERWORK REDUCTION ACT OF 1995

A. Justification

1. Circumstances Necessitating Data Collection.

This request is for the clearance of data collection and reporting requirements for Core Performance Reporting. The adoption of Core Performance Reporting for discretionary or competitively funded grants will enable the U.S. Department of Housing and Urban Development (HUD) Office of Strategic Planning and Management (OSPM) to collect better data to track and analyze the performance of the discretionary programs annually. A key component of the Core Performance Reporting is ensuring the Department's discretionary grant awards are clearly focused on outcomes and efforts to continually improve these outcomes while ensuring comparability of data through the standardization of data element definitions and data collection requirements. The proposed reporting requirements align with goals and objectives identified in the Notices of Funding Availability published for the Department's discretionary grants. Since HUD has not established performance benchmarks, the Department will not use data collected to establish accountability, measure success, or determine selection for award or funding level.

The Department's first attempt to systematically collect performance information on discretionary grant programs used a proprietary product called the Logic Model / eLogic Model. The eLogic Model was intended to collect information on a wide variety of outcomes, and includes separate performance reports based on unique data definitions and outcome measures. Each discretionary grant program selected the outcomes and outputs for which grantees would report without regard for the outcomes being tracked by programs funding similar activities. For example, in FY2013 nine programs used varying numbers of the 734 unique performance measures to assess the performance of their respective discretionary grants. In FY2015 only two programs continued the use of the eLogic Model.

All programs, except the two currently using the eLogic Model, specify unique reporting requirements with which grantees must comply. Many programs require annual progress or performance reports based on each grant's period of performance. The lack of standardized data elements and reporting significantly limits the Department's ability to effectively analyze grantee data for reporting on the progress of programs to senior Departmental officials, the Administration, Congress and taxpayers. Additionally, the lack of standardized data collection and report preparation procedures increases the burden on grantees with multiple grant awards from HUD.



The need for a comprehensive and standardized reporting approach is underscored by reviews conducted by external oversight agencies, including the Department's Office of the Inspector General (OIG) and the Government Accountability Office (GAO). These oversight agencies have questioned the validity and comparability of data reported by the Department to Congress. To address these issues, the Department is using its statutory and regulatory authority to redesign and strengthen its various discretionary grant program performance reports into a single comprehensive framework.

The Secretary's statutory and regulatory authority to administer housing and urban development programs include provisions allowing for the requirement of performance reporting from grantees. This legal authority is codified at 42 USC 3535(r):

"Program evaluation and monitoring

(1) For the programs listed in paragraph (2), amounts appropriated under this subsection shall be available to the Secretary for evaluating and monitoring of all such programs (including all aspects of the public housing and section 202 programs) and collecting and maintaining data for such purposes. The Secretary shall expend amounts made available under this subsection in accordance with the need and complexity of evaluating and monitoring each such program and collecting and maintaining data for such purposes.

(2) The programs subject to this subsection shall be the programs authorized under—

(A) titles I [42 U.S.C. 1437 et seq.] and II 1 of the United States Housing Act of 1937;

(B) section 202 of the Housing Act of 1959 [12 U.S.C. 1701q];

(C) section 106 of the Housing and Urban Development Act of 1968 [12 U.S.C. 1701x];

(D) the Fair Housing Act [42 U.S.C. 3601 et seq.];

(E) title I [42 U.S.C. 5301 et seq.] and section 810 1 of the Housing and Community Development Act of 1974;

(F) section 201 of the Housing and Community Development Amendments of 1978 [12 U.S.C. 1715z-1a];

(G) the Congregate Housing Services Act of 1978 [42 U.S.C. 8001 et seq.];

(H) section 222 of the Housing and Urban-Rural Recovery Act of 1983;

(I) section 3616a of this title;

(J) title IV of the McKinney-Vento Homeless Assistance Act [42 U.S.C. 11360 et seq.]; and

(K) titles II [42 U.S.C. 12721 et seq.], III, and IV and section 811 [42 U.S.C. 8013] of the Cranston-Gonzalez National Affordable Housing Act.

(3) In conducting evaluations and monitoring pursuant to the authority under this subsection, and collecting and maintaining data pursuant to the authority under this subsection, the Secretary shall determine any need for additional staff and funding relating to evaluating and monitoring the programs under paragraph (2) and collecting and maintaining data for such purposes.

(4)(A) The Secretary may provide for evaluation and monitoring under this subsection and collecting and maintaining data for such purposes directly or by grants, contracts, or interagency agreements. Not more than 50 percent of the amounts made available under paragraph (1) may be used for grants, contracts, or interagency agreements.



(B) Any amounts not used for grants, contracts, or interagency agreements under subparagraph (A) shall be used in a manner that increases and strengthens the ability of the Department to monitor and evaluate the programs under paragraph (2) and to collect and maintain data for such purposes through officers and employees of the Department.

(5) There are authorized to be appropriated to carry out this subsection such sums as may be necessary for fiscal year 1993 and fiscal year 1994. Such amounts shall remain available until expended.”

It is also important to note this request for Core Performance Reporting aligns with and advances the President’s Second Term Management Agenda. The President outlined a management agenda for his second term that delivers a smarter, more innovative, and more results-oriented government for citizens. An important component of that effort is strengthening agencies’ abilities to continually improve program performance by applying existing evidence about what works and using innovation to test new approaches to program delivery.

2. How, by whom and for what purpose the information is to be used.

Eligible entities receiving discretionary grant funds from HUD are expected to implement the proposed recordkeeping and reporting requirements with available grant funds. The proposed reporting requirements will better organize data already being collected and help standardize the measurement of performance. The Participant Record-level Report (PRL) and the Capital Investment Record-level Report (CIRL) contain the data elements to be collected and the purpose for collecting each item, while the Grant Feedback Report (GF) is a voluntary report for supporting communication.

Information collected and reported will be used by grantees and HUD for the following purposes:

- To continuously improve the quality, effectiveness, and efficiency of programs;
- To provide management information for program administration and oversight, including the monitoring of grant-specific participation, services, capital investments, and outcomes;
- To ensure grantees receive sufficient and timely technical assistance and support.

3. Use of Technology to Reduce Burden.

The Core Performance Reporting will streamline HUD’s collection of data and grantee preparation of reports by providing an online reporting portal that, initially, will accept data via extensible markup language (XML) uploads as well as manual data entry. HUD anticipates deploying data upload via Excel in a later implementation phase. The



Department will expand its current use of the Grants Center of Excellence at the Department of Health and Human Services to include the online data collection portal.

Once HUD implements the online data collection portal, grantees will annually upload Participant Record-level data via XML format or manually enter data. The Department anticipates launching data upload via Excel in the second year of implementation. The Grant Feedback form may be submitted via the online data collection portal using manual data entry.

The majority of current grantees use automated case management and project management applications to manage program activities. The Department will provide extensive technical assistance to grantees to assist them in understanding and making needed changes to existing vendor-developed and home-grown automated case management and project management data collection and reporting tools.

4. Duplication of Similar Information.

The Participant Record-level report (PRL) and the Capital Investment Record-level report (CIRL) are the only reports that require data on individual participants and capital investment projects for discretionary grants, respectively. There will be instances where limited, identical individual and/or capital investment project information may be collected by other Program Offices. The use of data export and import functionality will enable grantees to collect data once and submit required data for the PRL and CIRL reports directly from their management information systems to HUD.

5. Methods to Minimize Burden on Small Businesses.

No small businesses or entities are impacted. No small businesses are involved as respondents to this data collection effort.

6. Less Frequent Data Collection.

Both the Department and recipient are mandated by various program-specific legislative acts, as well as the Government Performance and Results Act, to establish performance standards and make available reports concerning program operations and expenditures. The inability to utilize program performance data in order to develop strategies for continuous improvement could negatively affect system performance, future Congressional appropriations, and individuals who benefit from services provided through these programs.

Annual collection of this data is essential to maximize the Department's ability to provide appropriate technical assistance to grantees related to compliance with program and



Federal reporting requirements, program design and implementation, and process improvement.

Additionally, 42 USC 3535(r)(1) charges the Department with “...*evaluating and monitoring of all such programs (including all aspects of the public housing and section 202 programs) and collecting and maintaining data for such purposes.*” If this proposed collection request were not approved, the Department would not be able to fulfill its oversight role.

The Department is proposing the frequency of grantee reporting under this collection request be once annually for the PRL and CIRL. The Department proposes that the Grant Feedback Report be an optional report that the grantee may submit up to once per year. Currently, the frequency of reporting is mixed among the discretionary grants, making it difficult to get a timely and complete picture on grant activities. Presently, there is no standardized approach to the frequency of reporting. In the last fiscal year, 57% of the discretionary grant programs required annual reporting, 36% required quarterly reporting and 7% of the grant programs required real-time reporting. In determining the frequency of reporting, the Department considered factors such as the size of the grant award, the duration of the project, the complexity of the grantee operation and the availability of resources in producing such reports without interrupting normal operation.

If the proposed annual reporting were eliminated for the PRL and CIRL reports and completed only during the grant closeout process, the Department’s ability to track and monitor discretionary grants would be severely constrained. There is a tremendous need for annual reporting so the grantees can track their progress in achieving their stated performance goals and reporting those results to HUD.

7. Special Circumstances.

These data collection efforts do not involve any special circumstances.

8. Federal Register Notice/Outside Consultation.

In accordance with 5 CFR 1320.6 this information collection soliciting public comments was announced for 60 days in the Federal Register on September 10, 2015, Volume 80, No. 175, Page 54577. This information collection soliciting public comments was announced for an additional 10 days in the Federal Register on November 18, 2015, Volume 80, No. 222, Page 72100.



There were a total of 43 comments submitted to the 60-Day Federal Register Notice and its subsequent 10-Day extension. Most of the comments were requests to receive the accompanying documentation to the notice. All requests were fulfilled. One comment sought clarity on the terminology of a data element related to “abnormal blood-lead results”. In response, an additional data element on blood-lead level tests was incorporated into the Participant Record-level Report. And consequently, the associated core performance indicator was also revised. Another comment pointed out that one of the core performance indicators related to attrition could be due to factors outside the control of the service providers. Hence, that core performance indicator was removed. A few comments specified the need for additional time in order to respond adequately to the notice. Ten days were extended to respond to the original notice.

Some concerns were raised on the applicability, reasonableness, and burden from the new approach. First in regards to applicability, it was explained in response that each program shall determine which data elements out of the entire inventory listed are applicable to it. Thus, only a subset of the entire listing of data elements would be collected by grantees. Furthermore, of those applicable data elements, their collection would only occur in proportion to the services a recipient receives. Second, in regards to applicability, reasonableness, and burden, it was explained in response that a one-year proof of concept pilot will be conducted before any broader implementation is to occur. The pilot will largely be used to test and evaluate whether the new reporting approach is feasible and practical, and if the data elements are appropriate. Additionally, it was explained that an online data collection and reporting tool will be made available to grantees that will be tested in the pilot. Its purpose will be to allow grantees with existing electronic systems to do a simple data file upload when reporting. The online data collection and reporting tool will also accommodate grantees without an electronic system by allowing them to input their data directly into the tool. All aspects of the methodology will be evaluated during and after the conclusion of the pilot. Throughout the pilot and broader implementation, technical assistance and guidance will be provided to grantees.

In accordance with 5 CFR 1320.6 this information collection soliciting public comments was announced for 30 days in the Federal Register on April 26, 2016, Volume 81, No. 80, Page 24631.

There were a total of 29 comments submitted to the 30-Day Federal Register Notice. All of the comments were requests to receive the accompanying documentation to the notice. All requests were fulfilled.

9. Payment/Gift to Respondents.

The Department does not provide remuneration to grantees.



10. Confidentiality.

The Privacy Act (5 USC 552a) provides the statutory authority for confidentiality. The Department is responsible for protecting the confidentiality of record-level or individual record data and will maintain the data in accordance with all applicable Federal laws, with particular emphasis upon compliance with the provisions of the Privacy Act and the Freedom of Information Act (FOIA). The FOIA provides that any person has a right, enforceable in court, to obtain access to federal agency records, except to the extent that these records are protected from public disclosure.

Please note the record-based data submitted by grantees and maintained by the Department will not contain any personally identifying information identified by the National Institute of Standards and Technology (NIST) as clearly distinguishing individual identity (e.g., names, Social Security Numbers, birth dates, physical addresses, et cetera). Each grantee will submit records to the Department each year, but it will submit these records using unique individual identifiers developed and known only by the grantee. The unique identifiers will not contain any personally identifiable information. The optional Grant Feedback Report will not contain any protected personal information.

At a later date, the Department intends to annually publish public-use data files constructed from the record-level reports submitted by grantees. In order to further ensure non-disclosure of individual identity and characteristics and to limit the dissemination of data of unacceptable quality, census tract geographic area information will be redacted or removed from the public-use data and publicly available analytical products. If the data for a grant has 25 or fewer individuals served during a fiscal year as reported in the record-level reports, then the results for the demographic data elements for the 25 or fewer individuals will also be redacted or removed from the public-use data file and publicly available analytical products.

11. Sensitive Questions.

Potentially private or sensitive demographic information to be reported under this request are already required by authorizing legislation to be collected and documented for eligibility determination purposes in order for individuals receive Department-funded services and products. This collection request does not include questions of a sensitive nature for grantees, sub-grantees and participating individuals.

12. Burden Estimate (Total Hours and Wages).

The burden for the requested collection is limited to the amount of information to be collected that is not already being collected by grantees as part of their customary and usual burden to run the program (e.g., data already being collected for eligibility determination purposes). Thus the burden reflects the information collected solely to



comply with the requested reporting requirements applicable to roughly 2,000 discretionary grantees. The estimate also does not include the burden associated with collecting and reporting information required to meet Equal Employment Opportunity requirements, which are covered under a separate estimate.

Please refer to Table 1 for annual burden estimates for the requested reporting approach. Table 1 outlines the costs for the one-year pilot (also referred to as the proof of concept pilot project).

A proof of concept pilot project is an opportunity to demonstrate with a small group of grantees in a controlled manner the value of collecting and reporting record-level data and feedback information to the Federal-level to track and manage grantee performance while also identifying and exploring the technical and operational risks involved in a nation-wide deployment. The proof of concept pilot project will take place for approximately one year to test the design idea and related assumptions associated with the report submissions.

The data collection burden calculation uses a minutes per record estimate. The PRL and CIRL minutes per record estimate are derived from the count of data elements that are required for the record type, as well as the relative burden of collecting that data. The Grant Feedback Report estimate is derived from the number of items to be addressed by the grantee.



Table 1
Annual Burden Estimate for the Requested Reporting Approach
Initial Year or Proof of Concept Pilot Project

Type of Record	Number of Respondents	Submission Frequency	Hourly Rate ¹	Average No. of Minutes	Estimated Annual Burden Hours	Estimated Annual Burden Dollars
Participant Record-level (data export to HUD reporting system)	1,500 grantees ²	1	\$14.19	5 Per Record	15,375.00	218,171.00
Participant Record-level (direct data entry)	500 grantees ²	1	\$14.19	20 Per Record	20,500.00	\$290,895.00
Capital Investment Record-level	7 grantees ³	1	\$14.19	15 Per Record	7.00	\$99.00
Grant Feedback	200 grantees	1	\$14.19	30	100.00	\$1,419.00
Total	////	////	\$14.19	////	35,982.00	\$510,585.00

¹The hourly rate of \$14.19 is the average wage for office and administrative support occupations as reported in the May 2014 Occupational Employment and Wages produced by the U.S. Department of Labor, Bureau of Labor Statistics.

²There are an estimated 246,000 individuals to be served by the 2,000 grantees.

³There are an estimated 28 project-level records for the 7 grantees.



13. Capital Costs.

There are no capital costs for respondents beyond customary or usual business practices or that are not otherwise required to achieve regulatory compliance.

14. Cost to the Federal Government.

Since the Department is utilizing a shared service offered by HHS, HUD is not incurring any capital costs.

15. Program or Burden Changes.

The current approach (the use of the eLogic Models) does not provide a useful, reliable and accurate picture of the results and impacts of Department's discretionary investments. The Government Accountability Office (GAO) issued this conclusion in a 2013 report: Rental Housing Assistance: HUD Data on Self-Sufficiency Programs Should Be Improved (GAO-13-581: Published: Jul 9, 2013). The Department also conducted an internal study of the utility of the eLogic Models and found:

- Due to its highly flexible nature, the eLogic Models lack uniformity or standardization in the definitions and uses of data elements, including outcome and impact indicators, preventing the Department from comparing similar grants;
- Impossible to aggregate discretionary grantee outcomes to determine the overall outcomes and impacts associated with these investments;
- Extremely difficult to nearly impossible to validate the accuracy of outcome and impact data reported by grantees to the Department; and
- The depth and complexity of the eLogic Models resulted in confusion among grantees, with many discretionary grantees failing to submit complete periodic performance summaries or failing to submit performance summaries at all.

In 2013, the Department's Deputy Secretary announced the phasing out of the use of the eLogic Models for reporting and directed staff to develop and implement a standardized reporting and performance measurement approach for discretionary grants.

The shift from the current OMB-approved reporting approach to the proposed approach will result in an increase in the estimated annual burden hours, largely due to the proposed collection of standardized individual record data on capital investment projects and program participants or direct beneficiaries of Department-funded services and products. The collection and analysis of "case-level" data instead of aggregate data on individual participants and projects is considered to be a gold standard approach to describing, explaining and predicting program outcomes. Program results can be aggregated at many different levels using this approach. A major advantage of collecting and analyzing record-level data over the conventional aggregate data approach is that it allows detailed



participant-level and project-level exploration of program effectiveness in relation to individual/project characteristics and the services and products (including capital investments) individuals received during participation.

Table 2 details the burden hour estimate for the current OMB-approved data collection and reporting approach based on 11,000 grantee respondents. Please note the burden hour estimates in Table 2 include the Continuum of Care and Choice Neighborhood grants, while the burden hour estimates in Table 1 do not include these two types of grants as the pilot will be limited in size. The estimated annual number of burden hours for the current approach is 109,175 or the equivalent of \$1,637.625 (\$149 per grantee) in estimated costs. The estimated annual burden hours for the proposed pilot detailed in Table 1 is 35,982 hours or an estimated cost of \$510,585 (\$749 per grantee).

Table 2
“eLogic Model” Grant Performance Report Standard Burden Estimate
Current OMB Approved Reporting Requirement

Number of Respondents	Frequency of Responses	Number of Responses	Estimated Average Response Time	Estimated Annual Burden Hours
6,540 existing grantees	1	6,540	4.50 hours	29,430.00
60 new grantees	1	60	5.75 hours	345.00
4,360 existing grantees	4	17,440	4.50 hours	78,480.00
40 new grantees	4	160	5.75 hours	920.00
Total	////	24,200	////	109,175.00

Note: Respondent cost was computed to be \$1,637.625 annually and assumes the average hourly rate was \$15. The respondent cost was calculated using the following formula: (\$15 an hour)*(109,175 annual burden hours).



16. Publication and Tabulation Dates.

There are no plans to publish information at this time.

17. Expiration Date.

The OMB expiration date will be displayed on all data collection instruments. No exceptions are requested.

18. Certification Statement.

No exceptions are requested in the “Certification of Paperwork Reduction Act Submissions.”

B. Collection of Information Employing Statistical Methods

This information collection request does not contain statistical methods.