

## Supporting Statement for Paperwork Reduction Act Submissions

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

**OMB Control Number:** 2502-0485

**(SF-424, SF-425, HUD-90006, HUD-90198, HUD-91178-A, HUD-91180-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.**

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.**

Grantee must submit an **SF-424**, Application for Federal Assistance, with all initial requests for funding. This is a standard form required for use by applicant when submitting a request for funding. under discretionary programs. HUD will use this form to collect descriptive information for all applicants.

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. Owners are required to submit this form at time of renewal.

HUD Field staff will review semi-annual Federal Financial Reports, **SF-425 Federal Financial Report**, in order to monitor the proper use of grants funds. The SF-425 form also referred to as the Federal Financial Report (FFR) is a required Office of Management and

Budget (OMB) financial reporting form to track the status of financial data tied to this Federal grant award. 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. Owners are required to submit this form at time of renewal.

After establishing a Line of Credit Control System (eLOCCS) account, CHSP grantees may draw down funds by completing and submitting form **HUD-90198, eLOCCS/VRS Congregate Housing Services Program Payment Voucher**.

HUD Field staff will also review the eLOCCS Congregate Housing Services Program 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-Congregate Housing Services Program Annual Reporting Form**), 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. Owners are required to submit this form at time of renewal.

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.**

Starting in FY18 all requests for funding extension must be submitted via GrantSolution.gov. Grantees must submit the required information via Grant Solutions. Extensions will be processed using this system. The Grant Solutions is an electronic grants management system that will streamline and standardize many grants management processes for HUD and its grantees. It will be used to make awards and amendments and receive and post award action

requests. Grant Solutions will increase accountability and transparency of application and award processing, cut our processing time, and allow us to work with our grantees directly in the system. Initial submission requires a form SF-424, all renewals thereafter will be tied to the initial SF-424. Grant funds are disbursed through the electronic online Line of Credit Control System (eLOCCS).

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;  
**No, this collection does not require quarterly reports from respondents.**
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;  
**Respondents are not required to prepare a written response to this collection.**
- requiring respondents to submit more than an original and two copies of any document;  
**Two copies of documents are not required for this collection.**
- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;  
**There are no other records required to retain beyond the above.**

- 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;  
**Statistical surveys are not used for this collection.**
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;  
**Statistical data classifications are not used for this collection.**
- 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  
**Any pledge of confidentiality used for this collection is supported by established authority and regulation.**
- 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.  
**This is not required by respondents.**

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.**

In accordance with 5CFR 1320.8(d), this information collection soliciting public comments was announced in the Federal Register on **April 18, 2018**, Volume **83**, No. **75**, Pages **17186**. **No** comments were received.

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

HUD does not provide payments or gifts to respondents in exchange for a benefit sought.

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

A Privacy Threshold Analysis has been approved for this collection. HUD is committed to protecting the privacy of individuals' information stored electronically or in paper form, in accordance with federal privacy laws, guidance, and best practices. Grantees are required to maintain confidentiality of information related to any individual, in accordance with the Privacy Act of 1974.

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.

Forms	No. of Respondents	Frequency of Response	Total Annual Responses	Burden Hour Per Response	Annual Burden Hours	Hourly Cost	Total Annual Cost
<b>Standard Forms</b>							
SF-424	0.00	0.00	0.00	0.00	0.00	0.00	\$0.00
SF-425	0.00	0.00	0.00	0.00	0.00	0.00	\$0.00
<b>2502-0485 Information Collection</b>							
HUD 90006,	49.00	1.00	49.00	4.00	196.00	\$24.00	\$4,704.00
HUD-90198	49.00	1.00	49.00	0.25	12.25	\$24.00	\$294.00
HUD 91178-A	49.00	1.00	49.00	2.00	98.00	\$24.00	\$2,352.00
HUD-91180-A	49.00	1.00	49.00	14.00	686.00	\$24.00	\$16,464.00
<b>Total:</b>	196.00	1.00	196.00		992.25	\$24.00	\$23,814.00

\* The hourly cost is based on an average annual salary of \$50,000.

- 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

Forms	Responses	Hours per Response	Total Hours	Cost per Hours*	Total Cost
SF-424	0.00	0.00	0.00	0.00	\$0.00
HUD-91180-A	49.00	14.00	686.00	\$36.00	\$24,696.00
HUD 90006 Congregate Housing Services Program Annual Reporting Form	49.00	4.00	196.00	\$36.00	\$7,056.00
HUD-90198 eLOCCS Payment Voucher	49.00	0.25	12.25	\$36.00	\$441.00
Federal Financial Report, SF-425	0.00	0.00	0.00	0.00	\$0.00
HUD 91178-A	49.00	2.00	98.00	\$36.00	\$3,528.00
<b>Total</b>	<b>196.00</b>	<b>20.25</b>	<b>992.25</b>		<b>\$35,721.00</b>

\* 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.**

This request seeks a reinstatement with a change. The increase in burden hours and dollar amounts is a correction to the prior submission. Further to comply with standard submission requirements, Form HUD-90003 was deleted and SF-424 form is being added.

**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.**

HUD is not seeking approval to not display the expiration date for OMB approval of the information collection.

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

No exceptions have been identified.

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

This collection does not employ statistical methods.