

**Supporting Statement for Paperwork Reduction Act Submission – Housing Opportunities  
for Persons With AIDS (HOPWA)  
OMB Control No. 2506-0133**

A. Justification

**Introduction**

This submission is to request an extension with revision of a currently approved collection for the application submission and reporting burden associated with the Housing Opportunities for Persons With AIDS (HOPWA) program. This submission will seek to maintain the current approval with a revision to add application narratives and all required forms for HOPWA competitive funding to the reporting burden, and adjust the public burden hours for actual number of respondents covered by OMB control number 2506-0133. Additionally, the Department proposes minor revisions and technical edits to the forms covered under the current approval HUD-40110-B (HOPWA Competitive Application & Renewal of Permanent Supportive Housing Project Budget Summary), HUD-40110-C (Annual Progress Report (APR) for competitive and renewal grantees), HUD-40110-D (Consolidated Annual Performance and Evaluation Report (CAPER) for formula grantees). HUD is requesting a three-year approval timeframe.

1. Need for Information Collection.

The currently approved HOPWA paperwork collection expires on December 31, 2017, under OMB Control Number 2506-0133. HUD is requesting a revision of currently approved collection and technical edits to currently approved forms HUD-40110-B, C, and D. This revision request is for competitive grant application narratives and all required forms to be added to the current approval. This revision would allow HOPWA to solicit applications for a HOPWA grant competition (pending funding availability) with an insignificant change to the current approval. Due to lack of funding availability for a new HOPWA grant competition in recent years, grant application narratives have not been needed or included in this PRA request. Previously narratives and other requirements were covered by other information collection approvals through a Super Notice of Funding Availability (SuperNOFA) for Housing and Community Development Programs, but now HOPWA must publish an individual program Notice of Funding Availability (NOFA) and establish criteria for each rating factor in a HOPWA NOFA. Application Requirements for HOPWA competitive grants are addressed in the HOPWA statute at 42 U.S.C. 12901-12 and the corresponding regulations at 24 CFR Part 574. The statute includes:

- 42 U.S.C. 12903(d). Applications. Funds made available under this section shall be allocated among applications submitted by applicants and approved by the Secretary. Applications for assistance under this section shall be submitted by an applicant in such form and in accordance with such procedures as the Secretary shall establish. Such applications shall contain—
  - (1) a description of the proposed activities;
  - (2) a description of the size and characteristics of the population that would be served by the proposed activities;
  - (3) a description of the public and private resources that are expected to be made available in connection with the proposed activities;
  - (4) assurances satisfactory to the Secretary that any property purchased, leased, rehabilitated, renovated, or converted with assistance under this section shall be operated for not less than 10 years for the purpose specified in the application, except as otherwise specified in this chapter;
  - (5) evidence in a form acceptable to the Secretary that the proposed activities will meet urgent needs that are not being met by available public and private sources; and
  - (6) such other information or certifications that the Secretary determines to be necessary to achieve the purposes of this section.

The regulations requiring narratives for HOPWA grant applications include:

- 24 CFR 574.200(c). The competitive grants are awarded based on applications, as described in subpart C of this part, submitted in response to a NOFA published in the FEDERAL REGISTER. All States and units of general local government and nonprofit organizations are eligible to apply for competitive grants to fund projects of national significance. Only those States and units of general local government that do not qualify for formula allocations are eligible to apply for competitive grants to fund other projects.
- 24 CFR 574.240. Application requirements. Applications must comply with the provisions of the Department's NOFA for the fiscal year published in the Federal Register in accordance with 24 CFR part 12. The rating criteria, including the point value for each, are described in the NOFA, including criteria determined by the Secretary.

The regulations cited above refer to the FEDERAL REGISTER, but it should be clarified that NOFAs are now published on Grants.gov. HUD is no longer required to publish NOFAs in the Federal Register. Section 233 of the Department of HUD Appropriations Act, 2009, Pub. L. No. 111-8, Div. I, Title II (Mar. 11, 2009) authorized HUD in 2009 and thereafter to publish NOFAs on the web.

HUD has established five standard rating factors to evaluate applications and determine whether an applicant will be awarded funding in the General Section to HUD's annual Notice[s] of Funding Availability for Discretionary Programs (General Section). Applicants applying for HUD competitive funds are required to respond to these five rating factors in narrative form. These narratives complement the HOPWA budget form (HUD-40110-B) currently approved, and allow HOPWA to determine if applicants are proposing projects within statutory and regulatory limitations. The five HUD standard rating factors include: Factor 1: Capacity of the Applicant and Relevant Organizational Staff; Factor 2: Need/Extent of the Problem; Factor 3: Soundness of Approach; Factor 4: Leveraging Resources; and Factor 5: Achieving Results and Program Evaluation. Applicants will be required to respond to each rating factor within the page limits establish in the grant solicitation.

The currently approved HOPWA paperwork collection also covers reporting and recordkeeping requirements for both HOPWA formula and competitive grant programs. The HOPWA statute and corresponding regulations requiring reporting and recordkeeping are listed below:

- 42 U.S.C. 12911. Report. Any organization or agency that receives a grant under this chapter shall submit to the Secretary, for any fiscal year in which the organization or agency receives a grant under this chapter, a report describing the use of the amounts received, which shall include the number of individuals assisted, the types of assistance provided, and any other information that the Secretary determines to be appropriate.
- 24 CFR 574.520. Performance reports.
  - (a) Formula grants. For a formula grant recipient, the performance reporting requirements are specified in 24 CFR part 91.
  - (b) Competitive grants. A grantee shall submit to HUD annually a report describing the use of the amounts received, including the number of individuals assisted, the types of assistance provided, data on emergency transfers requested under 24 CFR 5.2005(e), pertaining to victims of domestic violence, dating violence, sexual assault, or stalking, including data on the outcomes of such requests, and any other information that HUD may require. Annual reports are required until all grant funds are expended.
- 24 CFR 91.520(f). HOPWA. For jurisdictions receiving funding under the HOPWA program, the report must include the number of individuals assisted and the types of assistance provided, as well as data on emergency transfers requested under 24 CFR 5.2005(e), pertaining to victims of domestic violence, dating violence, sexual assault, or stalking, including data on the outcomes of such requests.

- 24 CFR 574.530. Recordkeeping. Each grantee must ensure that records are maintained for a 4-year period to document compliance with the provisions of this part. Grantees must maintain the following:
  - (a) Current and accurate data on the race and ethnicity of program participants.
  - (b) Documentation related to the formula grantee's Assessment of Fair Housing, as described in 24 CFR 5.168.
  - (c) Data on emergency transfers requested under 24 CFR 5.2005(e), pertaining to victims of domestic violence, dating violence, sexual assault, or stalking, including data on the outcomes of such requests.

## 2. How the information is or will be used.

The current Paperwork Reduction Act approval under OMB Control No. 2506-0133 covers both the HOPWA formula and competitive grant programs. The competitive grant program includes new competitive grants and renewal grants. The information collection requirements pertain to grant application submission requirements which will be used to rate applications, determine eligibility, and establish grant amounts. HOPWA plans to continue using form HUD-40110-B, HOPWA Competitive Application & Renewal of Permanent Supportive Housing Project Budget Summary, as a component of determining applicant eligibility and establishing grant amounts for competitive grants. Limited technical edits are proposed for form HUD-40110-B. HOPWA competitive and renewal application submission also require submission of the following forms: SF424 and SF424b assurances; SFLLL; and HUD-2991. Form HUD-2991 is currently covered under OMB approval number 2506-0112.

The addition of narratives to address the five HUD standard rating factors will allow HUD to rate application and further determine eligibility and establish grant amounts. Applicants applying for HUD competitive funds are required to respond to these five rating factors in narrative form. These narratives will complement the currently approved budget summary form, and allow HUD to determine if applicants are proposing projects within statutory and regulatory limitations. The five HUD standard rating factors include: Factor 1: Capacity of the Applicant and Relevant Organizational Staff; Factor 2: Need/Extent of the Problem; Factor 3: Soundness of Approach; Factor 4: Leveraging Resources; and Factor 5: Achieving Results and Program Evaluation. New HOPWA competitive applicants will be required to respond to each rating factor within the page limits established in the grant solicitation. HOPWA renewal applicants will also be required to respond with narratives, but the information will be more limited and focused on continued compliance with the HOPWA program activities originally awarded under their initial grant application.

The reporting and recordkeeping for both HOPWA formula and competitive grant programs are also included in this approval. Technical edits are proposed for forms HUD-40110-C and HUD-40110-D, and are limited to updating outdated references and information currently contained in the forms. Grantees provide annual information on program accomplishments that supports program evaluation and the ability to measure program beneficiary outcomes related to: maintaining housing stability; preventing homelessness; and improving access to care and support. Competitive grantees report through HUD-40110-C, the HOPWA APR; Formula grantees report through HUD-40110-D, the HOPWA CAPER. Grantees are required to report on the activities undertaken only, thus there may be components of these reporting requirements that may not be applicable. HUD systematically reviews and conducts data analysis in order to prepare national and individual grantee performance profiles that are not only used to measure program performance against benchmark goals and objectives, but also to communicate the program's achievement and contributions towards Departmental strategic goals.

The Office of HIV/AIDS Housing is currently working to further update and streamline forms HUD-40110-C and HUD-40110-D into one reporting form for all HOPWA grantees. HUD continues to strive toward reducing grantee reporting burden by ensuring all reporting requirements and guidance are clear and succinct. The Department is consulting with HOPWA stakeholders, particularly the team of HOPWA national technical assistance providers, to provide feedback and recommendations for consolidation and

ease of HOPWA reporting. HUD will be seeking public comment through a Federal Register Notice once the consolidation of these forms have been completed.

**Completed technical edits incorporated into forms covered by this proposed information collection, as discussed above.**

- I. HUD-40110-B, HOPWA Competitive Application & Renewal of Permanent Supportive Housing Project Budget Summary
  - a. Cover page description. The statement, “Selections of applications for funding under the HOPWA Program are based on the rating factors set forth in the SuperNOFA for Housing and Community Development Programs and the criteria established in the annual HOPWA renewal notice for those permanent supportive housing grantee’s seeking renewal funding.” changed to, “Selections of applications for funding under the HOPWA Program are based on the rating factors set forth in the published NOFA and the criteria established in the annual HOPWA renewal notice for eligible permanent supportive housing grantees seeking renewal funding.” This edit reflects a change in Departmental process that now each program office releases a NOFA when funding is available to be awarded.
  - b. Cover page description. The public reporting burden was updated on the budget form to show the number of hours it would take to complete the renewal grant application versus the new competitive grant application.
  - c. Transparency Act Compliance. This section of the form was removed. All grantees are required to enter this information into Federal Funding Accountability and Transparency Act (FFATA) Federal Subaward Reporting System (FSRS) so it is no longer necessary to collect this information here.
  - d. Applicant Certifications. These certifications were removed. The certifications are covered through form SF424b assurances.
- II. HUD-40110-C, HOPWA APR
  - a. Cover page and Overview pages.
    - i. Descriptive paragraph. The number of burden hours was updated.
    - ii. Recordkeeping. HMIS overview of HOPWA elements were updated to reflect current HMIS elements.
    - iii. Operating Year. This definition was updated to keep program terminology consistent through out the form.
    - iv. Filing Requirements. The physical address was updated to include the correct room number.
    - v. Central Contractor Registration (CCR) and System of Award Management (SAM). All references to CCR were removed and replaced with SAM. CCR was incorporated into SAM and is no longer relevant to reference.
    - vi. Program Income. The citation was updated to reflect new 2 CFR part 200 requirements.
    - vii. Subrecipient. All references to subrecipients were removed, including charts for subrecipients. This form will only capture information from the grantee and project sponsor.
  - b. Part 2: Grantee Narrative and Assessment
    - i. E. Unmet Housing Need. This section was removed. Grantees are no longer required to report on local unmet need.
  - c. Part 3: Summary Overview of Grant Activities
    - i. Section 3: Households. The link to HUD-published area median income was updated.
- III. HUD-40110-D, HOPWA CAPER
  - a. Cover page and Overview pages.
    - i. Descriptive paragraph. The number of burden hours was updated.

- ii. Recordkeeping. HMIS overview of HOPWA elements were updated to reflect current HMIS elements.
  - iii. Operating Year. This definition was updated to keep program terminology consistent through out the form.
  - iv. Filing Requirements. The physical address was updated to include the correct room number.
  - v. CCR and SAM. All references to CCR were removed and replaced with SAM. CCR was incorporated into SAM and is no longer relevant to reference.
  - vi. Program Income. The citation was updated to reflect new 2 CFR part 200 requirements.
  - vii. Subrecipient. All references to subrecipients were removed, including charts for subrecipients. This form will only capture information from the grantee and project sponsor.
- b. Part 1: 5. Grantee Narrative and Performance Assessment
    - i. d. Unmet Housing Need. This section was removed. Grantees are no longer required to report on local unmet need.
  - c. Part 3: Accomplishment Data
    - i. Opening paragraph. References to reporting in IDIS were removed. Grantees are no longer required to use IDIS for the reporting of Accomplishment Data.
  - d. Part 7: Summary Overview of Grant Activities
    - i. Section 3: Households. The link to HUD-published area median income was updated.

### 3. Electronic submission of information.

All competitive grant applications are submitted electronically. The applications for new competitive grants are submitted through Grants.gov, and starting in FY17, renewal applicants will submit applications through the GrantSolutions online system, Grants Management Module (GMM). The only forms currently fillable through these systems for the online submission are the SF424 and the SFLLL. All forms covered under this approval will be uploaded to these online systems once completed.

At this time, the APR and CAPER are utilized through a paper-based information collecting system in which performance data is entered into an Access database system after the grantee submits their report to HUD. Part of the work to further update and streamline the APR and CAPER involves making the reporting form available in an electronic form that allows completion electronically. Currently, grantees submit completed APRs and CAPERs via email to HUD.

### 4. Identification of information duplication.

Competitive grant application information (including narratives) is only collected when applicants choose to apply for a HOPWA competitive grant. This information is not collected elsewhere. With the introduction of the GrantSolutions online system for HOPWA competitive renewal grants in FY17, renewal grantee accounts will be linked to the System of Award Management (SAM). The initial renewal application in GrantSolutions will require grantee verification by HUD, then subsequent renewal applications will only require verification of the already submitted information by the renewal applicant.

The Transparency Act Compliance section was removed from the form HUD-40110-B to reduce duplication of information submitted by applicants and grantees. All grantees are required to enter this information into FSRS so it is no longer necessary to collect this information here.

The unmet need assessment was also removed in the APR and CAPER. This information will now be provided by HUD to grantees so there is a uniform calculation of unmet need across the nation. Grantees will not be asked to duplicate work being done at the national level.

### 5. Impact on small businesses or other small entities.

Small businesses or other small entities will not be impacted by the revision to collect narratives for HOPWA competitive grants. Eligibility for HOPWA competitive grants is limited to States, units of local governments, and nonprofits. While some nonprofits may be small entities, narratives in competitive grant applications will only ask for specific responses to rating factors with page limits.

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.

HOPWA new competitive and renewal grant applications are only collected when funding is available to award these grants. Information collected through new competitive and renewal grant applications are used to rate applications, determine eligibility, and establish grant amounts to ensure HOPWA appropriations are implemented correctly. If information was not captured in the application package (including form HUD-40110-B, narratives, and other required forms), the Department would be hindered in its effort to determine and assess grantee eligibility, and award new competitive grant applications and existing renewal applications.

All grantees receiving HOPWA funding must maintain compliance through reporting and recordkeeping as required through HOPWA statute and regulations. APR and CAPER performance reports are collected and analyzed on an annual basis and are 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. Information on the performance reports are posted on the HOPWA page on the HUD Exchange 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. Special circumstances.

In accordance to HOPWA regulation at 24 CFR 574.530, HOPWA grantees must ensure that records are maintained for a four-year period to document compliance. No other special circumstances for the HOPWA program would cause this information collection to be conducted in a manner that would impose additional requirements identified under this item. Special circumstances not required for this information collection are listed below.

- This information collection does not require respondents to report information more often than quarterly.
- This information collection does not require respondents to prepare a written response in fewer than thirty days after they receive the request.
- This information collection does not require respondents to submit more than an original and two copies of any document.
- This information collection does not include statistical surveys not designed to produce results that can be generalized to the universe of study.
- This information collection does not require the use of a statistical data classification that has not been reviewed and approved by OMB.
- This information collection does not include a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.
- This information collection does not require respondents to submit proprietary, trade secret, or other confidential information unless the agency can demonstrate that it has instituted (and not just planned) procedures to protect its confidentiality to the extent permitted by law.

8. Date and page number of the Federal Register notice (provide a copy) soliciting comments and public input. Summarize any public comments and describe response to comments. Describe all efforts to consult with persons outside the agency to obtain their input.

HUD published a notice in the Federal Register to solicit public comment on June 16, 2017 in Vol. 82, No.115, pages 27716-27718. HUD received no comments.

9. Explain any payments or gifts to respondents, other than remuneration of contractors or grantees. These circumstances are not applicable to the HOPWA program since HUD does not provide payment.

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

HOPWA competitive application applications are reviewed by HUD staff or other reviewers defined in the NOFA or renewal notice. The applications for awarded grants will serve as the grant project plan and be incorporated into the grant agreement. The applications of unawarded grants will be filed for the required 3-year record keeping period, and then destroyed. The unawarded applications will only be accessible to the public through an approved FOIA request.

42 U.S.C. § 12905(e) and 24 CFR 574.440 require that grantees and their respective project sponsors maintain the confidentiality and identities of HOPWA program participants, which includes that sufficient processes are in place to ensure sound confidential recordkeeping. All forms are in compliance with this requirement.

11. Justify any questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private.

No questions of a sensitive matter are included as part of the requested or required submission of these application submission or reporting requirements.

12. Hour and Cost Burden Estimates to Grant Recipients:

Information Collection	Number of Respondents	Responses per Year	Total Annual Responses	Hours per Response	Total Hours	Hourly Cost	Annualized Cost
HOPWA Renewal Application (including HUD-40110-B, narratives, and other requirements listed in the renewal notice)	28.00	1.00	28.00	15.00	420.00	\$23.85	\$10,017.00
HOPWA Competitive Application (including HUD-40110-B, narratives, and other requirements listed in the NOFA)	40.00	1.00	40.00	45.00	1,800.00	\$23.85	\$42,930.00
HUD-40110-C Annual Progress Report (APR)	99.00	1.00	99.00	55.00	5,445.00	\$23.85	\$129,863.25
HUD-40110-D Consolidated Annual Performance and Evaluation Report	128.00	1.00	128.00	41.00	5,248.00	\$23.85	\$125,164.80

(CAPER)							
Recordkeeping for Competitive, Renewal, and Formula Grantees	227.00	1.00	227.00	60.00	13,620.00	\$23.85	\$324,837.00
Grant Amendments (budget change, extension, or early termination)	30.00	1.00	30.00	6.00	180.00	\$23.85	\$4,293.00
<b>Total</b>	552.00	-	552.00	-	26,713.00	-	\$637,105.05

This chart reflects the public burden for OMB approval 2506-0133 adjusted for the revision to add application narratives and other required forms, and updated with a more accurate number of respondents. Renewal applications and new competitive applications were also separated out to better reflect the number of hours required to renew a HOPWA grant versus applying for a new HOPWA grant award. There were two grantees from New Orleans, LA and San Jose, CA who submitted both a HOPWA renewal grant application and a new HOPWA competitive grant application in FY16. These grantees were consulted to understand the number of hours needed to complete both applications. Their responses were used to estimate the number of hours needed to complete a renewal and a new competitive application.

Renewal grants are awarded for a three-year operating period. Currently, there are 82 eligible renewal grantees. The number of respondents listed for HOPWA renewal applications represents one-third of the renewal grantees, or the estimated number of grantees projected to renew HOPWA grants each year. The number of respondents listed for HOPWA competitive applications represents the number of respondents expected to submit an application if funding becomes available in the next three years. Form HUD-40110-C, the APR is submitted by all renewal and competitive grantees on an annual basis. The number of respondents for the APR include 82 renewal grantees, eight (8) current HOPWA competitive grantees, and nine (9) potential competitive grantees, if funding becomes available.

HOPWA grantees and applicants may be required to respond to more than one piece of information collection. The total number of respondents include: 82 renewal grantees, eight (8) current HOPWA competitive grantees, 40 potential competitive applicants, and 128 current HOPWA formula grantees. The total of 552 total annual responses captures each unique response from the 258 respondents. All annualized costs reflect staff time spent on tasks in the table. The hourly rate is based on a GS-9 for Rest of United States. 26,713 hours \* \$23.85 = \$637,105.05

13. Estimate of the average, annual cost beyond the cost of hour burden shown in Items 12.

There are no known additional costs to respondents.

14. Estimate annualized costs to HUD of collecting the information, including processing the information.

Type of Collection	Number of Respondents	Hours per Respondent	Total Annual Hours	Hourly Cost	Estimated Cost
Review of Renewal Application (including HUD-40110-B and narratives)	28.00	20.00	560.00	\$38.20	\$21,392.00
Review of HOPWA Competitive Application (including HUD-40110-B and narratives)	40.00	30.00	1200.00	\$38.20	\$45,840.00
Awarding of Competitive and Renewal Grants	37.00	10.00	370.00	\$38.20	\$14,134.00
Review of HUD-40110-C Annual Progress Report (APR)	99.00	16.00	1584.00	\$38.20	\$60,508.80



Review of HUD-40110-D Consolidated Annual Performance and Evaluation Report (CAPER)	128.00	12.00	1536.00	\$38.20	\$58,675.20
Compiling and publicly publishing grantee performance and accomplishment summaries	227.00	4.00	908.00	\$38.20	\$34,685.60
Execution of Grant Amendments (budget change, extension, or early termination)	30.00	6.00	180.00	\$38.20	\$6,876.00
<b>Total</b>	<b>589.00</b>	<b>-</b>	<b>6,338.00</b>	<b>-</b>	<b>\$242,111.60</b>

All annualized costs reflect staff time spent on tasks in the table. The hourly rate is based on a GS-12 in Washington, DC. 6,338.00 hours \* \$38.20 = \$242,11.60

15. Explain any program changes or adjustments reported in items 13 and 14 of the OMB Form 83i. Also explain any other changes/revisions to the information collection.

This submission is requesting an increase in burden hours to account for all aspects of information collection under this approval including HOPWA competitive and renewal grant applications, recordkeeping, and reporting. The burden hours for renewal and competitive applications have been separated out under this request to reflect the difference between the two application. Also under this request, there will be a slight decrease in hours required to complete forms HUD-40110- C and D due to the removal of unmet need assessment in both forms.

It is projected that the proposed revisions will increase the overall burden requirement shown below, but more accurately reflect the actual burden hours and responses for this approval.

**BURDEN:**

	<b>Responses</b>	<b>Hours</b>
<b>Previous</b>	253	10,864
<b>New</b>	258	26,713
<b>Adjustment</b>	+ 5	+ 15,849

16. If the information will be published, outline plans for tabulation and publication.

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. National and grantee-level performance profiles based on information submitted in the APR and CAPER are posted on the HOPWA page on the HUD Exchange website quarterly in March, June, September, and December.

17. Explain any request to not display the expiration date.

No approval is sought to not display the expiration date for the OMB approval of the information collected.

18. Explain each exception to the certification statement identified in item 83i-19.

No exception is sought to the certification statement.

## B. Collections of Information Employing Statistical Methods

The HOPWA program does not use statistical methods.