

Supporting Statement for Paperwork Reduction Act Submissions

Multifamily Housing Service Coordinator Program OMB Control Number 2502-0447

HUD-91186, HUD-91186-A, HUD-50080-SCMF, HUD-2530, HUD-2880, SF-424, SF-424-Supp & SF-LLL

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.

Funding may be provided through Grants or Budget-based:

Grants. Service coordinators can be funded through HUD's Multifamily Housing Service Coordinator grant program. Owners of eligible properties may apply for funds through HUD's grant process. Applicants must show that they have no other funds available to pay for a service coordinator. Service Coordinator grants are made for an initial three-year term and provide funding for the salary, fringe benefits, and related administrative costs associated with employing a Service Coordinator.

Upon the completion of the initial term, HUD offers annual extensions to previously funded grants so as ensure the continuity of the Service Coordinator Program for our residents. These extension funds are to be used only to meet a critical need and are to be used in cases where no other funding source is available. Meeting a "critical need" means addressing a need that cannot be met through use of other resources. All extensions are subject to the availability of funds.

Based on information provided by a grantee's periodic reports, payment vouchers, requests for extension funds, and through remote and on-site grant reviews, field staff will reevaluate a grantee's eligibility and need for continued funding.

Budget-based. Service coordinators can also be funded through the property's operating budget with HUD approval - referred to as budget-based service coordinators. For example, owners of Section 202 properties can include the service coordinator position in the development's operating budget, where the position is supported by rental assistance under a project rental assistance contract or project-based Section 8 contract. Also, in cases where properties accrue a rental subsidy that is not needed to pay operating costs (residual receipts), the monies must be spent on activities that will benefit the property and the residents, which can

include a service coordinator. In addition, property owners that prepay or refinance a direct loan and subsequently have a debt service savings can use the additional cash flow to fund a service coordinator.

Supportive Services Demonstration Program:

The Consolidated Appropriations Act, 2014 (Public Law 113-76), approved on January 17, 2014 provides the authority to develop a housing-with-services demonstration program for low-income elderly to test models that demonstrate the potential to delay or avoid the need for nursing home care.

HUD's Supportive Services Demonstration (SSD) seeks to implement a voluntary, housing-based, supportive services model to facilitate aging in place by helping residents proactively address their health and social needs, including transitions across care settings, and enhance their ability for self-care management. HUD seeks to bring health, wellness, and social support interventions to HUD-assisted housing.

A total of 80 grant awards were announced on January 13, 2017.

The eligible applicant pool for this program include properties without a current Service Coordinator that 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.

- New request for grant funding requires that the applicant submits narrative description of evidencing provision of Supportive Services. This information is used to determine the applicant's ability to assess service needs for the residents.
- New request for grant funding requires that the applicant submits Evidence of comparable salaries for Service Coordinators. This information is used by the Department to determine the reasonableness of the funding request. The determination of reasonableness is aligned with 2 CFR Part 200.
- Newly funded recipients must enter into a binding agreement with the Department. The Grant Agreement stipulates the basic conditions and terms of the award.
- **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-50080-SCME**, 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 must 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.

HUD Field staff will also review the eLOCCS 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.

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.

- **Form HUD-2880**, Applicant/Recipient Update/Disclosure Report, covered under OMB 2510-0011, 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 electronically via APPs System for all stakeholders as determined by HUD. 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. All new applicants must submit this form at time of application submission. For grant renewals, when a change in ownership occurs, the new ownership entities will be required to submit this form via GrantSolutions. Approximately 5% of the portfolio changes ownership annually
- **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 Multifamily Service Coordination Program (MFSC) Program is adopting HUD's **Standards for Success (SfS)** new reporting framework for our performance report requirements. Starting in January 2019, SfS will replace the Semi-Annual Performance Report (form HUD-92456). Form HUD-92456, Semi-Annual Performance Report, was 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.

The U.S. Department of Housing and Urban Development (HUD) Standards for Success (SfS) Pilot is HUD's newly developed standardized reporting framework for its discretionary-funded programs. The framework's main tenants are: (1) standardization of data elements, measures, definitions, metrics, and reporting periods across HUD programs; (2) alignment of programmatic data elements and measures with higher-level agency priority goals and objectives; and (3) the utilization of record-level reports for greater analysis and responsiveness of programs.

SfS will modernize the type of data collected, as well as the data collection process. This new reporting framework, when fully implemented, will also enhance the Department's efforts to analyze performance data collected across the portfolio. Data will be stored in a central database, where it can be easily analyzed on demand. Lastly, the implementation of this new reporting framework will provide better tools for HUD regional offices to communicate with grantees and verify the accuracy and timeliness of grantee data.

HUD Field staff will continue to evaluate the effectiveness and efficacy of grant-funded activities. The staff will compare proposed programs and objectives with realized results. Poor administration of funds or activities, funds spent on ineligible activities, or failure to comply with terms and conditions of the Grant Agreement will require enforcement action. Such action may require sanctions including recapturing of funds or levying other administrative or legal penalties.

- 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.**

New Submission: Applicants can only complete and submit grant applications electronically through www.grants.gov. Grantees will be required to submit the standard forms along with Forms HUD-91186, HUD-50080-SCMF, and supporting narratives using grant.gov. 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.

Renewals: Starting in FY17 all requests for funding extension must be submitted via GrantSolution.gov. Grantees must submit the required information via GrantSolutions. Extensions will be processed using this system. The GrantSolutions 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. GrantSolutions 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. 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.

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.

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. 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.

The staff has discussed reporting requirements with at least three existing grantees to solicit their comments on the requested information collection. Notice was published in the Federal Register on **February 27, 2019**, Volume **84**, Number **39**, and Page **6433**, Comments **No**.

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:

| Organization | Contact | Title | Phone Number |
|----------------------------------|--------------------|---|---------------------|
| Volunteers of America | Donna Thurmond | Vice President, Resident Services | 703-341-5051 |
| Leading Age | Colleen Bloom | Director for Housing Operations | 202-508-9483 |
| PK Management, LLC | Joyce L. Walker | Vice President of Community Development | 216-472-1870 |
| California Commercial Investment | Katrina Kujan | Quality Assurance Administrator | 805-845-1585 |
| National Church Residences | Melissa McClelland | Grants Administrator | 614-233-2169 |

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.

- Subject to the availability of funds, HUD anticipates approximately 250 new applicants annually
- Of the 250 new applicants, HUD expects to award on average 100 new grant recipients. Only these new grantees will be required to sign the Grant Agreement.
- It is estimated that on average 100 Owners may submit a request for budget-based funding. This request is treated as a new submission and Owners are required to submit form HUD-91186
- Currently, there approximately 1,600 grant recipients that are renewed annually.
- Of the current grantees, approximately 1,550 are expected to submit annual extension requests. The remaining 50 typically are renewed using residual receipt funds.
- There are approximately 3,000 Multifamily Housing projects that have a Service Coordinator paid for with non-grant HUD funds.

| Information Collection | No. of Respondents | Frequency of Response | Total Annual Responses | Burden Hour Per Response | Annual Burden Hours | Annual Cost |
|---|---------------------------|------------------------------|-------------------------------|---------------------------------|----------------------------|--------------------|
| 2502-0447 Expiration Date: 11/30/2018 | | | | | | |
| Narrative description of evidencing provision of Supportive Services | 250 | 1 | 250 | 1 | 250 | 250 |
| Evidence of comparable salaries for Service Coordinators | 250 | 1 | 250 | 1 | 250 | 250 |
| HUD-1044-Grant Agreement | 100 | 1 | 100 | 1 | 100 | 100 |
| HUD-91186-Multifamily Housing Service Coordinator First-Time Funding Request | 350 | 1 | 350 | 4 | 1400 | 5600 |
| Grant Extension Request form HUD-91186-A* | 1550 | 1 | 1550 | 2 | 3100 | 6200 |
| LOCCS Payment Voucher HUD-50080-SCMF* | 1730 | 4 | 6920 | 0.5 | 3460 | 1730 |
| TOTALS: | 4230 | 9 | 9420 | 9.5 | 8560 | 14130 |
| Associated Forms | | | | | | |
| HUD-2880 - Applicant/Recipient Disclosure/Update Report (2510-0011) | 250 | 1 | 250 | 2 | 500 | n/a |
| Form HUD-2530 , Previous Participation Certification (2502-0118) | 250 | 1 | 250 | 1 | 250 | n/a |
| TOTALS: | | | | | | |
| Standard Forms | | | | | | |
| SF-424 - Application for Federal Assistance (<i>*This amount includes 5% of the 1600 grants that are renewed annually</i>) | 330 | 1 | 330 | 0.75 | 247.50 | n/a |
| SF-424-Supplemental , Survey on Ensuring Equal Opportunity for Applicants | 250 | 1 | 250 | 0.3.0 | 75 | n/a |
| SF-LLL - Disclosure of Lobbying Activities | 250 | 1 | 250 | 0.17 | 42.5 | n/a |
| Standard for Success | 4500 | 1 | 4500 | 1 | 4500 | n/a |
| TOTALS: | | | | | | \$14,130 |

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

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.

See chart in question 12 for total estimate cost.

The cost to the Federal Government is based on a cost per hour of an average annual salary of a GS-12. That annual amount is **\$62,722**.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

This is a request to reinstate with change, of a previously approved collection. The following changes include:

- Number of respondents decreased from 9,770 to 4,230
- Total annual responses decreased from 15,790 to 9,420
- Burden hours decreased from 46,594 to 8,560

The significant decline in burden hours is a result of previous errors. Under this current submission, recipients of funds burden have been reduced due to the Departments automation efforts under GrantSolutions and Standard for Success (SfS). Starting in January 2019, SfS will replace the Semi-Annual Performance Report (form HUD-92456), which is being deleted in this submission. Form HUD-92456, Semi-Annual Performance Report, was 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. The collection of information tied to new submissions is likely limited to budget-based awards since current appropriation levels does not allow for new funding under the grant program. However, in the event of funding availability, the burden associated with new submissions remains accounted for.

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.