



# 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 renewed clearance of data collection and reporting requirements for Standards for Success Reporting at the U.S. Department of Housing and Urban Development (HUD). The adoption of Standards for Success Reporting for discretionary or competitively-funded programs enables the HUD Office of Business Transformation (OBT) better assess the effectiveness and performance of the discretionary programs annually. A key component of Standards for Success Reporting is ensuring HUD's discretionary awards are clearly focused on outcomes and efforts to continually improve these outcomes, while allowing comparability of data through the standardization of data element definitions and data collection requirements. The proposed reporting requirements align with program goals and objectives identified in the Notices of Funding Availability published for HUD's discretionary programs. The discretionary-funded programs included are the Multifamily Housing Service Coordinator Grant Program, the Multifamily Housing Budget-Based Service Coordinator Program, and the Resident Opportunity and Self Sufficiency Service Coordinator Grant Program (ROSS).

Prior to Standards for Success, HUD's attempt to systematically collect performance information on discretionary 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 included separate performance reports based on unique data definitions and outcome measures. Each discretionary program selected the outcomes and outputs on which funding-recipients 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 awards. In FY2015 only two programs continued the use of the eLogic Model.

All programs, except the programs currently using Standards for Success, specify unique reporting requirements with which funding-recipients must comply. Many HUD programs require annual progress or performance reports based on each award's period of performance. The lack of standardized data elements and reporting significantly limits HUD's ability to effectively analyze funding-recipient data for reporting on the progress of programs to senior HUD officials, the Administration, Congress and taxpayers. Additionally, the lack of standardized data collection and report preparation procedures increases the burden on funding-recipients with multiple awards from HUD.



The need for a comprehensive and standardized reporting approach is underscored by reviews conducted by external oversight agencies, including the HUD Office of the Inspector General (OIG) and the Government Accountability Office (GAO). In response, HUD is using its statutory and regulatory authority to improve and strengthen performance reporting for its discretionary programs, ultimately working towards a single comprehensive approach.

The Secretary's statutory and regulatory authority to administer housing and urban development programs include provisions allowing for the requirement of performance reporting from funding-recipients. 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.”*

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

Applicable entities receiving discretionary funds from HUD implement the proposed recordkeeping and reporting requirements with available HUD funds. The proposed reporting requirements better organizes data already collected and helps standardize the measurement of performance. The HUD Participant Record-Level Report (HUD-PRL) contains the data elements collected and the purpose for collecting each item.

Information collected and reported is used by funding-recipients and HUD for the following purposes:

- To provide program and performance information and data to stakeholders including taxpayers, Congress, advocacy groups, and others;
- To continuously improve the quality, effectiveness, and efficiency of programs;
- To provide management information for program administration and oversight, including the scoring of applications and the monitoring of funding-recipient participation, services, and outcomes;
- To ensure funding-recipients receive sufficient and timely technical assistance and support; and
- To better measure and analyze performance information to identify successful practices to be replicated and prevent or correct problematic practices and improve outcomes in compliance with the Government Performance and Results Act (GPRA) and the GPRA Modernization Act (GPRAMA).

## **3. Use of Technology to Reduce Burden.**

Standards for Success Reporting streamlines HUD’s collection of data and funding-recipient preparation of reports by providing an online reporting portal through the GrantSolutions online data collection and reporting tool (OLDC). GrantSolutions OLDC allows users direct data input, Microsoft Excel or extensible markup language (XML) file uploads, and system-to-system connectivity with existing case management systems. For those funding recipients that choose to use the latter option of another case management system, HUD and GrantSolutions provide guidance and technical assistance to assist them in making any



needed changes to their existing vendor-developed and home-grown automated case management and project management data collection and reporting tools. Currently, there are two case management systems aligned with GrantSolutions OLDC; they are American Association of Service Coordinators (AASC) Online and FamilyMetrics software. HUD and GrantSolutions are currently engaged with aligning other systems to enable the same functionality.

GrantSolutions OLDC is part of a suite of online modules through the Grants Center of Excellence at the U.S. Department of Health and Human Services. GrantSolutions OLDC enables funding-recipients to input and save data throughout the reporting period. Upon conclusion of a given reporting period, funding-recipients can then submit their data seamlessly using the tool. To reduce burden, once reports are submitted, funding-recipients can carry over their data from year-to-year; thus, eliminating duplicative work and allowing funding-recipients to only have to record changes and additions from the previous year. To improve quality of data, guidance and validation rules are built-in to the interface as users input and ultimately submit data. Throughout the reporting cycle, HUD and GrantSolutions guide and assist funding-recipients in understanding Standards for Success reporting requirements, data elements, and how to use GrantSolutions OLDC.

#### **4. Duplication of Similar Information.**

The HUD Participant Record-Level Report (HUD-PRL) is the only report that requires data on individual participants for discretionary programs. The GrantSolutions OLDC functionality enables funding-recipients to collect data once per reporting period and submit required data for the HUD-PRL report directly through GrantSolutions OLDC or from their management information systems.

#### **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 HUD and funding-recipients are mandated by various program-specific legislative acts, as well as GPRA and GPRAMA, 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 program performance, future Congressional appropriations, and individuals who benefit from services provided through these programs.

HUD's ability to oversee and ensure the efficient and effective use of federal funds by funding-recipients would be greatly impaired if this collection were not approved and



conducted as proposed. If this proposed collection were not approved, then HUD would not be able to:

- Distinguish discretionary funding-recipient program success from failure without the proposed approach to measuring the results of individual awards, activities, and the program overall;
- Incentivize or reward success as it would not be in a position to determine success;
- Avoid the risk of rewarding failure;
- Learn from its success if it cannot distinguish success from failure;
- Recognize failure in order to correct it; and
- Justify continued funding if HUD cannot demonstrate results.

Additionally, 42 USC 3535(r)(1) charges HUD 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, HUD would not be able to fulfill its oversight role.

The frequency of funding-recipient reporting under this collection request is once annually for the HUD-PRL. Currently, the frequency of reporting is mixed among the discretionary programs, making it difficult to get a timely and complete picture on award activities. Without Standards for Success, there is no standardized approach to the frequency of reporting. In fiscal year 2015, 57% of the discretionary programs required annual reporting, 36% required quarterly reporting and 7% of the programs required real-time reporting. In determining the frequency of reporting, HUD considered factors such as the size of the award, the duration of the project, the complexity of the funding-recipient’s operation, and the availability of resources in producing such reports without interrupting normal operation.

If annual reporting were eliminated for the HUD-PRL and completed only during the award closeout process, then HUD would be severely constrained in conducting performance-based evaluations, providing appropriate technical assistance, and performing risk assessments on discretionary awards. There is a tremendous need for reporting at least annually to assess and track the progress of awards in achieving stated performance goals.

## 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 May 3, 2019, Volume 84, No. 86, Page 19101. There were no comments submitted during the 60-Day Federal Register Notice.

## 9. Payment/Gift to Respondents.

HUD does not provide remuneration to funding-recipients.

## 10. Confidentiality.

The Privacy Act (5 USC 552a) provides the statutory authority for confidentiality. HUD is responsible for protecting the confidentiality of record-level or individual record data and maintains 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.

Record-based data submitted by funding-recipients and maintained by HUD does not contain any personally identifiable information (PII) specified 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 funding-recipient submits records to HUD each year, but it submits these records using unique individual identifiers developed and known only by the funding-recipient. The unique identifiers do not contain any personally identifiable information.

## 11. Sensitive Questions.

Potentially private or sensitive demographic information reported under this request is already required by authorizing legislation to be collected and documented for eligibility determination purposes in order for individuals to receive HUD-funded services and products. This collection request does not include questions of a sensitive nature for funding-recipients, sub-recipients 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 funding-recipients 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 approximately 4,821



discretionary funding-recipients. 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 the following table for annual burden estimates for the requested reporting approach. The data collection burden calculation uses a minutes per record estimate. The HUD-PRL minutes per record estimate is derived from the count of data elements that are required for the record type, as well as the relative burden of collecting that data.

**Annual Burden Estimate for the Requested Reporting Approach**

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hours per Response	Annual Burden Hours	Hourly Cost per Response	Annual Cost
HUD Participant Record-Level Report (HUD-PRL)	4,821	1	501,384 <sup>1</sup>	0.33	167,128	\$18.02 <sup>2</sup>	\$3,013,318

<sup>1</sup>There are an estimated 104 individuals served by each of the 4,821 funding recipients.

<sup>2</sup>The hourly cost of \$18.02 is the average wage for office and administrative support occupations as reported in the May 2018 Occupational Employment and Wages produced by the U.S. Department of Labor, Bureau of Labor Statistics.

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

**15. Program or Burden Changes.**

This is a revision of a currently approved collection with changes in the annual burden calculation occurring from expanding Standards for Success Reporting to include all Multifamily Housing Service Coordinator grants, all Multifamily Housing Budget-Based Service Coordinator sites, and all Resident Opportunities and Self-Sufficiency Service Coordinator grants.



## **16. Publication and Tabulation Dates.**

There are no plans to publish information at this time.

## **17. Expiration Date.**

The OMB expiration date is 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."

# **A. Collection of Information Employing Statistical Methods**

This information collection request does not contain statistical methods.