

Supporting Statement for
Paperwork Reduction Act Submission
Lead Hazard Control and Healthy Homes Grant Programs
Data Collection - Progress Reporting
(OMB No. 2539-0008)

A. JUSTIFICATION

1. Circumstances Making Information Collection Necessary.

This is a request for a revision of OMB's existing approval of reporting and data collection instruments for the grant programs of the Office of Lead Hazard Control and Healthy Homes (OLHCHH) (OMB Approval No. 2539-0008).

Section 1011 of the Housing and Community Development Act of 1992 (Public Law 102-550) authorizes a grant program for State and local governments for the evaluation and reduction of lead-based paint hazards in privately owned housing built before 1978 and occupied by families with low incomes, with a focus on protecting children under the age of 6.

The authority for the Healthy Homes Initiative is sections 501 and 502 of the Housing and Urban Development Act of 1970 and the Consolidated Appropriations Act, 2006 (Transportation, Treasury, Housing and Urban Development, the Judiciary, the District of Columbia, and Independent Agencies Appropriations Act, 2006 Public Law 109-115.)

This data collection is designed to provide timely information to HUD regarding the implementation progress of the grantees on carrying out the Lead Hazard Control Programs (such as the Lead Hazard Reduction Program), the Lead Technical Studies Program, and the Healthy Homes Programs (such as the Healthy Homes Technical Studies Program, Healthy Homes Production Grant Program for Tribal Housing, and other programs the OLHCHH may undertake in the future), and to provide Congress with status reports as required by statute, namely under Title X of the Housing and Community Development Act of 1992 (P.L. 102-550).

OLHCHH previously issued grants (and cooperative agreements) for Healthy Homes Demonstration, Lead Outreach, and Operation Lead Elimination Action programs; at present and due to funding made available, there are no plans to issue grants for these programs. However, if additional funding materializes, more grants will be issued.

2. Uses of the Data.

The Department will use this information to report to Congress on the progress of lead hazard reduction work and to determine the relative cost and effectiveness of various kinds of treatments to protect health. The Office estimates that up to 500 OLHCHH grantees will be reporting four times per year. Data collected electronically on-line from the Lead Hazard Reduction and Healthy Homes Production grant programs, and the Lead Technical Studies, and Healthy Homes Technical Studies cooperative agreement programs are used to document implementation of HUD's Strategic Objective to Remove Lead-Based Paint Hazards and Other

Health Risks from Homes. In particular, these data capture the number of housing units made lead-safe, and units where allergen and/or other housing-related health and safety hazards have been mitigated with corresponding health outcome improvements such as reduction in asthmatic episodes of children.

3. Data Automation.

The Healthy Homes Grant Management System (HHGMS) is designed to assist grant management and coordination between OLHCHH staff and key staff from grantee organizations. It is a cloud-based customer relationship management application. Key activities tracked and coordinated through this system include grant application review, grant negotiations, quarterly grantee progress reporting, grant amendment requests and processing, and grant closeouts. The vast majority of the data at grantee sites is collected in the field by the grantee and then entered on-line into HHGMS' electronic versions of the data collection forms. HHGMS coordinates with grantees through an external portal and with OLHCHH staff through an internal portal.

For the Lead Hazard Reduction Program, the largest program in OLHCHH, grantees are required to report quarterly on their progress toward completion of their goals and objectives. For example, they report, through HHGMS, on the number of recruited homes, the number of lead-based paint inspections and lead-based paint hazard risk assessments performed, and the number of housing units where lead hazard control work was completed. Similar requirements apply to the Healthy Homes Production for Tribal Housing Program.

By collecting data from 100% of its grantees, the OLHCHH will be able to collect and report on all grant performance for the annual performance goal more accurately.

4. Duplication.

OHHLHC Grantees are providing performance data on their progress toward meeting their established grant benchmarks and/or milestones. This information collection effort does not duplicate any other effort and will not produce any information duplication.

5. Small Businesses.

Small businesses may receive funding from the Healthy Homes Initiative (currently, the Healthy Homes Technical Studies or Lead Technical Studies) program. If so, they would be required to report to HUD on a quarterly basis, as do all the OLHCHH's grantees, in accordance with OMB's Uniform Guidance (2 CFR 200.328(b)(1)) and the program Notices of Funding Availability.

6. Federal Policy Notice.

If the proposed information is not collected for the Lead Hazard Reduction, and Healthy Homes Production programs, we will not be able to determine and make known the progress of the grantees in carrying out their strategic objective responsibilities of removing lead-based paint hazards and other health risks from homes.

If information is not collected for the technical studies programs, we will not be able to

evaluate the performance of grantees their strategy to advance the research agenda on the effects, evaluations and control of lead and other health and safety hazards in housing and the impacts on tenant health, under the strategic objective.

In addition, OLVCHH grantees report the number of individuals contacted, the number of units assessed, the number of interventions provided, the number of individuals reached through education/outreach activities and the number of individuals trained in lead safety and/or healthy homes principles.

7. Special Circumstances.

- requiring respondents to report information to the agency more than quarterly;
Not Applicable
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
Not Applicable
- requiring respondents to submit more than an original and two copies of any document;
Not Applicable
- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
Not Applicable
- 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;
Not Applicable
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
Not Applicable
- 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
Not Applicable
- 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.
Not Applicable

8. Federal Register Notice.

In accordance with 5 CFR 1320.6 this information collection soliciting public comments was announced in the Federal Register on May 6, 2019, Volume 84, No. 87, Page 19805. No requests for additional information were received.

9. Respondent Remuneration.

No payments or gifts are provided to respondents.

10. Confidentially.

This collection does not require the retention of confidential or sensitive material.

11. Sensitive Questions.

There are no sensitive questions being asked.

12. Respondent Burden.

OLHCHH estimates a significantly increased number of respondents reflecting the significantly increased funding of its grant programs (with the estimated number of respondents being sufficient to accommodate additional potential Healthy Homes grant programs that OLHCHH may undertake); the reporting frequency by each grantee is unchanged at quarterly, while the estimated average duration per report is increased from 2½ to 3 hours, based on comments from grantees, for an annual response duration increase from 10 to 12 hours per grantee.

Reporting Burden: HUD 96006 or electronic equivalent reporting.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
HUD 96006 (electronic equivalent)	500.00	4.00	2,000.00	12.00	24,000.00	60.98	1,463,520.00

All respondents' reporting expenses are covered by grant funds. Since quarterly reporting is a requirement of the grant programs, grantee staff prepares the quarterly reports. For most grantees, the Program Manager is the staff responsible for reporting into HHGMS. Based on the Department of Labor Bureau of Labor Statistics' most recent (March 2019) on the State and local government workers by occupational and industry group (www.bls.gov/news.release/ecec.t03.htm), we estimate these members of the Management, professional, and related series to have an average fully loaded hourly rate to be \$39.35 for salaries plus \$21.63 for benefits, for a total of \$60.98, rounded to \$61.

13. Cost Burden to Respondents.

There are no costs to the respondents other than those shown in item 12 above.

14. Annualized Cost to the Federal Government.

The annualized cost to the Federal government for data collection and management is an estimated maximum of \$175,000. The total estimated annualized capital cost is \$87,500 and the total estimated O&M annual cost is \$50,000. As with the increased respondent burden in item 12, OLHCHH estimates a significantly increased annualized cost to the federal government reflecting the significantly increased funding of its grant programs; the increase is proportional to the number of grants.

15. Program Changes.

This is a revision of a currently approved collection. The major change is in the number of grants, reflecting the increased funding of the OLHCHH's grant programs. Some new grant programs, including the Healthy Homes Production Grant Program for Tribal Housing are included.

16. Publication of Information.

There are no plans at this time to formally publish these results. They will be made available to state and local officials involved in lead-based paint poisoning and prevention programs and other interested parties.

Healthy Homes and Lead Technical Studies grantees are urged, in their respective Notices of Funding Availability, to publish their results in peer-reviewed technical journals.

17. Display of Expiration Date.

The expiration date of the data collection will be displayed on the right footer.

18. Exceptions to Certification Statement.

There are no exceptions.