

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

A. Justification

1. Need for Information Collection.

The currently approved HOPWA paperwork collection expires on January 31, 2021, under OMB Control Number 2506-0133. HUD is requesting a revision of the currently approved collection. This revision request would expand reporting requirements for new competitive grants funded as special projects of national significance (SPNS) only. The HOPWA statute at 42 U.S.C. 12903(c)(5) and the corresponding regulations at 24 CFR Part 574 – Subpart C allows HOPWA to fund special projects of national significance (SPNS) on a competitive basis. Per U.S.C. 12903(c)(5)(C), “...in selecting projects of national significance the Secretary shall consider (i) the need to assess the effectiveness of a particular model for providing supportive housing for eligible persons; (ii) the innovative nature of the proposed activity; and (iii) the potential replicability of the proposed activity in other similar localities or nationally.”

To ensure the innovative nature of the funded SPNS grants can be shared for potential replicability of grant activities in other similar localities or nationally, HOPWA requests additional data elements and narratives to be reported by new competitive SPNS grantees through the HIV Housing Care Continuum Model Report and the Housing as an Intervention to Fight AIDS (HIFA) Model Report. This revision would also allow HOPWA to begin aligning reported data elements with the Ryan White HIV/AIDS Program under OMB Control Number 0906-0039 and meaningfully participate in the Federal initiative, *Ending the Epidemic: A Plan for America*. Per HOPWA statute and corresponding regulations, the reporting requirements allow HUD to identify required reporting criteria not explicitly identified in the statute or regulation cited below.

§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(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.

This request is to expand reporting requirements for new competitive SPNS grants to aggregately report on an additional four data elements for each program beneficiary assisted annually, and provide a narrative summary of SPNS grant activities at the end of the grant period of performance.

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. This revision would only apply to reporting requirements for new competitive Special Projects of National Significance (SPNS) grants.

The current approval covers reporting for new competitive SPNS grants through HUD-40110-C, the HOPWA Annual Performance Report (APR). This submission requests to add four data elements to be reported annually through the HIV Housing Care Continuum Model Report to be submitted annually and the Housing as an Intervention to Fight AIDS (HIFA) report to be submitted at the end of the grant period of performance. The additional reporting will allow HOPWA to share lessons learned and promising practices with the public, and uphold the purpose of SPNS grants to be replicable in other similar localities or nationally.

The data elements in the HIV Housing Care Continuum Model Report follow Center for Disease Control (CDC) definitions for the HIV Care Continuum and will allow SPNS grantees to collect standardized project data that can be used to compare outcomes with other projects. The HIV Housing Care Continuum Model report will require grantees to collect four client-level data elements for each person with diagnosed HIV receiving HOPWA assistance by type of assistance received through this NOFA. The data elements include:

1. Receipt of Care. Receipt of care is measured as a person with diagnosed HIV receiving HOPWA assistance under this NOFA who had at least one CD4 or viral load test during the operating year.
2. Retained in Care. Retained in care is measured as a person with diagnosed HIV receiving HOPWA assistance under this NOFA who had two or more CD4 or viral load tests, performed at least three months apart during the operating year.
3. Viral Suppression. Viral suppression is measured as a person with diagnosed HIV receiving HOPWA assistance under this NOFA who had a viral load test result of <200 copies/mL at the most recent viral load test during the operating year.
4. Type of HOPWA assistance received. The type of HOPWA assistance received by the person with diagnosed HIV includes any HOPWA assistance for housing or supportive services funded through this NOFA. This data element will provide the denominator for the variety of HIV Housing Care Continuums created through the HIV Housing Care Continuum Model Report. Grantees will be required to separately report receipt of care, retained in care, and viral suppression for persons with diagnosed HIV receiving the following categories of type of HOPWA assistance under this NOFA: Any eligible HOPWA assistance; Housing assistance only; Supportive Services only; Both Housing assistance and Supportive Services; Tenant-based Rental Assistance (TBRA) and Master Leasing only; TBRA, Master Leasing, and Supportive Services; Facility-based Housing only; Facility-based Housing and Supportive Services; Short-term Rent, Mortgage, and Utilities (STRMU) only; STRMU and Supportive Services; Other Housing Activities only; and Other Housing Activities and Supportive Services.

Each annual submission of the HIV Housing Care Continuum Model report will cover only the data from the program year covered. The client-level data elements should be collected at minimum annually and at the following times: Client Intake, HOPWA Assistance Ends, Type of HOPWA Assistance Changes, or Recertification for HOPWA Assistance. In addition to the data elements collected, the grantee will provide a brief narrative to interpret the data reported.

The HIFA Model report will document the project's design, implementation, and outcomes, and identify best practices and model qualities related to the use of housing as a structural intervention in the ending the HIV/AIDS epidemic. The HIFA Model report includes the following components: a vision or goal for the project; description of the need being met by the project; description of the program design; description of the alignment with initiatives or strategies to end the HIV/AIDS epidemic; description of data collection and analysis used to make data-driven decisions on stable housing and positive health outcomes; description of culturally competent approaches used to clients experiencing service gaps; partnerships formed or continued with community organizations and other housing and service providers; resources and partnerships used to transition clients to self-sufficiency or other forms of housing assistance by the end of the grant period; successes and challenges in using housing as a structural intervention to end the HIV/AIDS epidemic; client outcomes related to health and housing stability including a summary of HIV Housing Care Continuum results and, if applicable, employment and income growth. Health outcome measures will include eligible program beneficiary CD4 count, viral load, and

perceived health. This data will be provided in the aggregate. Each HIFA Model will be shared with the public, and lessons learned through these grantee efforts will help inform national and community policy and actions.

Reporting and recordkeeping for both HOPWA formula and competitive grant programs are already included in this approval. As currently approved through this collection, all HOPWA grantees will continue to 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 Consolidated Annual Performance and Evaluation Report (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 currently approved collection also pertains to grant application submission requirements which will be used to rate applications, determine eligibility, and establish grant amounts. HOPWA will continue using application narratives and 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. HOPWA competitive and renewal application submission also continue to require submission of the following forms currently approved under this collection: SF424 and SF424b assurances; SFLLL; and HUD-2991. Form HUD-2991 is currently covered under OMB approval number 2506-0112.

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.

### 3. Electronic submission of information.

All new competitive grant applications are submitted electronically. The applications for new competitive grants are submitted through Grants.gov. 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. The two new reporting forms for new competitive SPNS grants added through this revision request will also be paper-based and submitted via email to HUD.

### 4. Identification of information duplication.

Information collected under this collection is relevant only to HOPWA grants and does not contain any information duplication.

5. Impact on small businesses or other small entities.

Small businesses or other small entities will not be impacted by the revision to add reporting forms for HOPWA new competitive SPNS grants. Eligibility for HOPWA competitive grants is limited to States, units of local governments, and nonprofits. While some nonprofits may be small entities, the reporting requirements are identified in the Notice of Funding Availability (NOFA) for new competitive SPNS grants and applicants for will have an appropriate amount of time to prepare for the addition reporting. HUD also intends to support awarded grantees with reporting requirements and grant implementation through technical assistance.

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.

The additional reporting for new competitive SPNS grants will allow HOPWA to ensure the innovative nature of the funded SPNS grants is documented for potential replicability of grant activities in other similar localities or nationally as intended for SPNS grants per 42 U.S.C. 12903(c)(5). If the reporting information is not captured, the Department will be hindered in its effort to award innovative projects and share promising practices to support successful and effective HOPWA program designs and activities. It will also hinder the HOPWA program from meaningfully participating in Federal initiative activities to end the HIV/AIDS epidemic.

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. n/a
- This information collection does not require respondents to prepare a written response in fewer than thirty days after they receive the request. n/a
- This information collection does not require respondents to submit more than an original and two copies of any document. n/a
- This information collection does not include statistical surveys not designed to produce results that can be generalized to the universe of study. n/a
- This information collection does not require the use of a statistical data classification that has not been reviewed and approved by OMB. n/a
- 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. n/a
- 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. n/a

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 March 24, 2020, vol 85, page 16643. 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 new competitive SPNS grant applicants are notified in the NOFA that the required reporting for the grant will be shared publicly. Information collected is specific to the project funded through the HOPWA program. HOPWA competitive grant 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	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual 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	\$25.35	\$10,647.00
HOPWA Competitive Application (including HUD-40110-B, narratives, and other requirements listed in the NOFA)	40.00	1.00	40.00	45.00	1800.00	\$25.35	\$45,630.00
HUD-40110-C Annual Progress Report (APR)	116.00	1.00	116.00	55.00	6380.00	\$25.35	\$161,733.00
HUD-40110-D Consolidated Annual Performance and Evaluation Report (CAPER)	128.00	1.00	128.00	41.00	5248.00	\$25.35	\$133,036.80
HIV Housing Care Continuum Model	26.00	1.00	26.00	20.00	520.00	\$25.35	\$13,182.00

Report (new competitive SPNS grant only)							
Housing as an Intervention to Fight AIDS (HIFA) Model Report (new competitive SPNS grant only)	26.00	1.00	26.00	40.00	1040.00	\$25.35	\$26,364.00
Recordkeeping for Competitive, Renewal, and Formula Grantees	244.00	1.00	244.00	60.00	14640.00	\$25.35	\$371,124.00
Grant Amendments (budget change, extension, or early termination)	30.00	1.00	30.00	6.00	180.00	\$25.35	\$4,563.00
<b>Total</b>	<b>638.00</b>	<b>-</b>	<b>638.00</b>	<b>-</b>	<b>30,228.00</b>	<b>-</b>	<b>\$766,279.80</b>

This chart reflects the public burden for OMB approval 2506-0133 adjusted for the revision to add two reporting forms for new competitive SPNS grants only (HIV Housing Care Continuum Model report and HIFA Model Report). The HIV Housing Care Continuum Model Report is an annual report with the first submissions expected in 2022. The HIFA Model Report is only required to be submitted at the end of the SPNS grant period of performance with the first submissions from awarded grantees expected in 2024.

Renewal applications and new competitive applications were separated out to reflect the number of hours required to renew a HOPWA grant versus applying for a new HOPWA grant award. 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. 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 26 expected new competitive SPNS grantees.

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, 26 expected new competitive SPNS grantees, 40 potential competitive applicants, and 128 current HOPWA formula grantees. The total of 638 total annual responses captures each unique response from the 284 respondents. All annualized costs reflect staff time spent on tasks in the table. The hourly rate of \$25.35 is based on a GS-9 for Rest of United States. 30,228 hours \* \$25.35 = \$766,279.80.

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	Frequency of Response	Responses Per Annum	Burden Hour per Respondent	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Review of Renewal Application (including HUD-40110-B and narratives)	28.00	1.00	28.00	20.00	560.00	\$41.37	\$23,167.20
Review of HOPWA	40.00	1.00	40.00	30.00	1200.00	\$41.37	\$49,644.00

Competitive Application (including HUD-40110-B and narratives)							
Awarding of Competitive and Renewal Grants	54.00	1.00	54.00	10.00	540.00	\$41.37	\$22,339.80
Review of HUD-40110-C Annual Progress Report (APR)	116.00	1.00	116.00	16.00	1856.00	\$41.37	\$76,782.72
Review of HUD-40110-D Consolidated Annual Performance and Evaluation Report (CAPER)	128.00	1.00	128.00	12.00	1536.00	\$41.37	\$63,544.32
HIV Housing Care Continuum Model Report (new competitive SPNS grant only)	26.00	1.00	26.00	10.00	260.00	\$41.37	\$10,756.20
Housing as an Intervention to Fight AIDS (HIFA) Model Report (new competitive SPNS grant only)	26.00	1.00	26.00	20.00	520.00	\$41.37	\$21,512.40
Compiling and publicly publishing grantee performance and accomplishment summaries	244.00	1.00	244.00	4.00	976.00	\$41.37	\$40,377.12
Execution of Grant Amendments (budget change, extension, or early termination)	30.00	1.00	30.00	6.00	180.00	\$41.37	\$7,446.60
<b>Total</b>	<b>692.00</b>			-	<b>7,628.00</b>	-	<b>\$315,570.36</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. 7,628.00 hours \* \$41.37 = \$315,570.36

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 to request a 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 is requesting an increase in burden hours to account for the two added reporting forms for new competitive SPNS grants under this approval. There is also an increase in the number of new competitive grants that can be funded through the HOPWA program accounting for the increase of 26 new grantee responses. It is projected that the proposed revisions will increase the overall burden requirement shown below.

BURDEN:

	Responses	Hours
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<b>Previous</b>	258	26,713
<b>New</b>	284	30,228
<b>Adjustment</b>	+ 26	+ 3,515

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.