

**DATA COLLECTION AND REPORTING
FOR HUD'S HOMELESS ASSISTANCE
PROGRAMS – ANNUAL PERFORMANCE
REPORT AND SYSTEM PERFORMANCE
REPORT**

**OMB PAPERWORK REDUCTION ACT
SUBMISSION**

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Table of Contents

Part A Justification	1
A1 Need and Legal Basis.....	1
<i>Why is this information necessary? Identify any legal or administrative requirements that necessitate the collection.</i>	1
A2 Information Users.....	4
A3 Improved Information Technologies.....	7
A4 Duplication of Similar Information.....	10
A5 Small Businesses.....	10
A6 Less Frequent Data Collection.....	11
A7 Special Circumstances.....	11
A8 Federal Register Notice/Outside Consultation.....	11
A9 Payment/Gift to Respondents.....	12
A10 Confidentiality.....	12
A11 Sensitive Questions.....	12
A12 Burden Estimate (Total Hours and Wages).....	12
A13 Capital Costs.....	16
A14 Cost to the Federal Government.....	16
A15 Program or Burden Changes.....	16
A16 Publication and Tabulation Dates.....	17
A17 Expiration Date.....	17
A18 Certification Statement.....	17
Part B: Statistical Methods	18
Attachment A	19
Performance Report Template (includes the Continuum of Care Program, and Youth Homelessness Demonstration Program Reports)	19
Attachment B	60
System-Level Performance Measures Template	60
Attachment C	65
Performance Data Check-up Template	65

Part A Justification

This package is a reinstatement of a package that expired under OMB Approval No. 2506-0145. The content in this package reflects the data collection for HUD's Annual Performance Report (APR) and also includes HUD's system-level performance measures, which will be reported by each CoC.

A1 Need and Legal Basis

Why is this information necessary? Identify any legal or administrative requirements that necessitate the collection.

This request is for clearance of data collection and reporting to enable the U.S. Department of Housing and Urban Development (HUD) Office of Community Planning and Development (CPD) to continue to manage and assess the effectiveness of its homeless assistance projects on an annual basis. Per 24 CFR 578.103(e), HUD requires recipients and subrecipients that receive funding through the CoC Program (authorized by the McKinney-Vento Homeless Assistance Act, as amended) to prepare and submit annual project-level reports on performance and spending.

This request will also enable the HUD CPD Office to initiate a process to assess the effectiveness of local coordinated systems of homeless assistance. The [McKinney-Vento Homeless Assistance Act](#), as amended, requires communities to measure their performance as a coordinated system, in addition to analyzing performance of specific projects and project types. Section 427 of the Act established a set of selection criteria for HUD to use in awarding CoC Program funding. These selection criteria require CoCs to report to HUD their system-level performance. The intent of these selection criteria are to encourage CoCs, in coordination with Emergency Solutions Grant (ESG) Program recipients and all other homeless assistance stakeholders in the community, to regularly measure their progress in meeting the needs of people experiencing homelessness in their community and to report this progress to HUD. This request is for HUD to collect system-level performance measure data from CoCs on an annual basis, as described in Appendix B of this document.

The project APR and system-level performance measures both rely on a primary data source in each CoC – a local Homeless Management Information System (HMIS). An HMIS is an electronic data collection system that stores project-level and person-level information about homeless persons who access a community's homeless service system. Over the past two decades, HUD has supported the development of local HMIS by funding their development and implementation, by providing technical assistance, and by developing national data standards that enable the collection of standardized information on the characteristics, service patterns and service needs of homeless persons within a jurisdiction and across jurisdictions. These standards are described in [HUD's HMIS Data Standards](#).

In addition to a CoC's HMIS data, the system-level performance measures will also rely on data collected by CoCs as part of their Point-in-Time (PIT) count efforts. CoCs are required by HUD

to complete a sheltered PIT count of all homeless persons who are sheltered in emergency shelter, transitional housing, and Safe Havens and a count of unsheltered persons on a single night in January at least once every other year. HUD incentivizes annual participation in the sheltered and unsheltered PIT count through its annual CoC Program Competition. HUD releases a Notice which outlines its data collection guidance for the PIT count and the Housing Inventory Count (HIC), which is an annual point-in-time inventory of projects within a CoC that provide beds and units dedicated to serve persons who are homeless.

The need and legal basis for these reporting requirements are presented below.

A.1.1 Annual Performance Report for Homeless Assistance Projects

The expired APR (OMB Approval No. 2506-0145; Expiration: March 31, 2013) is a report that tracks the progress and accomplishments of the following competitive Homeless Assistance Programs: the CoC Program and the Youth Homelessness Demonstration Program (YHDP). In 2009 the McKinney-Vento Homeless Assistance Act was amended to consolidate the Supportive Housing Program (SHP) and Shelter Plus Care (S+C) Program into a single funding source, the CoC Program. There are some S+C and SHP projects that are still submitting APRs due to the fulfillment of a 20-year use requirement. While the YHDP grants were awarded under NOFAs that were separate from the annual CoC Program NOFA they are subject to the CoC Program regulations unless otherwise stated in the applicable statute or NOFA. HUD also intends to publish a special CoC Program NOFA to address unsheltered homelessness. The reporting requirements are the same for the CoC program and YHDP, and HUD intends them to be the same for grants awarded under the Special CoC NOFA, except that YHDP and Special CoC NOFA grant recipients will submit quarterly and annual performance reports while CoC Program recipients submit only annual performance reports. These programs will be subject to the reporting requirements as described in this PRA submission.

Recipients of funding under the CoC Program must complete and submit a performance report for each year in which they operate a grant using HUD funds. Grants awarded under the Special CoC NOFA to address unsheltered homeless will be subject to a quarterly reporting requirement. In addition to providing the Department with important information to monitor individual project performance, the reports inform the Department's competitive process for CoC Program funding and enable the Department to report on overall program performance via HUD's Annual Performance Report. The APR is also used at the local level to evaluate program performance and to inform the CoC application process (OMB Control Number 2506-0112). HUD will require more frequent reporting for grants awarded under the special CoC Program NOFA for unsheltered homelessness because it is a time-sensitive issue that requires more regular accountability to HUD and the public. HUD will only award a limited number of grants under that NOFA – less than 50 – and HUD will clearly state that a condition of receiving the funds is the ability to report quarterly.

With this OMB request, HUD is proposing to re-design the APR to meet two key objectives. First, proposed changes to current data collection requirements will enable recipients and subrecipients to report more accurately on project accomplishment and outcomes. Second, by including questions for specific subpopulations of persons who are homeless (veterans, persons who are chronically homeless, and youth), HUD will be able to measure the impact that local projects are having in meeting the federal goals to end veteran homelessness, chronic homelessness, and youth homelessness.

Funding recipients are mandated to collect and report APR information to HUD per the following federal regulations (see Attachment A):

- **Continuum of Care Program** (24 CFR Part 578, subpart (C)): *APR*. The program rule at 24 CFR 578.33(f) provides that HUD may terminate the renewal of any grant and require the recipient to repay the renewal grant if the recipient fails to submit a HUD APR within 90 days of the end of the grant year immediately prior to renewal or if the recipient submits an APR that HUD deems unacceptable or shows noncompliance with the requirements of the grant and 24 CFR part 578. Section 578.103(e) of the CoC Program regulations further clarifies that recipients receiving grant funds for acquisition, rehabilitation, or new construction are expected to submit APRs for 15 years from the date of initial occupancy or the date of initial service provision, unless HUD provides an exception. The recipient's submission of the APR helps HUD review whether the recipient is carrying out the project in the manner proposed in the application. Recipients agree to submit an APR as a condition of their grant agreement. This requirement allows HUD to ensure that recipients submit APRs on grant agreements that have expired as a condition of receiving approval for a new grant agreement for the renewal project.

A.1.2 System-Level Performance Measures for Continuums of Care (CoCs)

The system-level performance measures will be used at the federal level to evaluate system performance and to inform the CoC application process (OMB Control Number 2506-0112).

With this OMB request, HUD requires reporting on the system-level performance measures to meet two key requirements. First, this reporting will allow CoCs to report to HUD on their ability to meet effectively and efficiently meet the needs of persons experiencing homelessness in their community, including helping people return to permanent housing and avoid returns to homelessness. This is distinct from the purpose of any other federal reporting on homelessness, including the AHAR. Second, this information will allow HUD to use this data as a competitive element of its process for awarding homeless assistance funding, as required by the McKinney-Vento Homeless Assistance Act.

CoCs must collect and report System-Level Performance Measures information (Attachment B) to HUD as part of the annual CoC Competition in accordance with section 427(a) and (b)(1)(A) of the McKinney-Vento Act, as amended, which provide:

(a) IN GENERAL.—The Secretary shall award funds to recipients through a national competition between geographic areas based on criteria established by the Secretary.

(b) REQUIRED CRITERIA.—

(1) IN GENERAL.—The criteria established under subsection (a) shall include—

(A) the previous performance of the recipient regarding homelessness, including performance related to funds provided under section 412 (except that recipients applying from geographic areas where no funds have been awarded under this subtitle, or under subtitles C, D, E, or F of title IV of this Act, as in effect prior to the date of the enactment of the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009, shall receive full credit for performance under this subparagraph), measured by criteria that shall be announced by the Secretary, that shall take into account barriers faced by individual homeless people, and that shall include—

(i) the length of time individuals and families remain homeless;

(ii) the extent to which individuals and families who leave homelessness experience additional spells of homelessness;

(iii) the thoroughness of grantees in the geographic area in reaching homeless individuals and families;

(iv) overall reduction in the number of homeless individuals and families;

(v) jobs and income growth for homeless individuals and families;

(vi) success at reducing the number of individuals and families who become homeless;

(vii) other accomplishments by the recipient related to reducing homelessness; and

(viii) for collaborative applicants that have exercised the authority under section 422(j) to serve families with children and youth defined as homeless under other Federal statutes, success in achieving the goals and outcomes identified in section 427(b)(1)(F)

A2 Information Users

How is the information collected and how is the information to be used?

A.2.1 APR for HUD's Homeless Assistance Programs

The APR will be used by recipients of YHDP funding, funding under the Special NOFA, and CoC Program funding, recipients of former SHP and S+C funding that are fulfilling reporting requirements per the 20-year use requirement, that continue to be renewed to report on the characteristics of people served and the performance and outcomes of projects. Recipients are required to collect data and prepare reports as a condition of funding.

An APR must be submitted for each grant year in which HUD funding is provided or for each year a project operates under a use restriction. A separate report must be submitted for each HUD grant received within 90 days after the end date of the recipient's grant year. Each recipient of CoC Program has a unique grant year. Therefore, APRs will be submitted to HUD throughout the year.

All APRs will be submitted to HUD electronically via *Sage HMIS Reporting Repository (Sage)*. The data are used by HUD to assess the performance of individual projects and to determine project compliance with funding requirements, including use of HUD funds for approved purposes and procurement of required matching funds. APRs are also aggregated by program type to provide information on overall program performance and outcomes to HUD staff, other federal agencies, the Congress, and the Office of Management and Budget.

Item-by-Item Justification

Detailed justification of each data element requested in the APR is contained in Attachment A.

In general, the re-designed APR covers the following topics:

1. **Grantee Information** – basic information about the grantee and project including the target population, the facility type, the number of beds in the project, and the extent to which data on clients served in the project are entered into the community Homeless Management Information System.
2. **Outputs** – counts of persons and households served, bed and unit utilization rates (for residential programs), and the number of client contacts (for street outreach programs).
3. **Client Characteristics** – information about all clients served in a project by household type and exit status.
4. **Program Performance** – information on performance measures including access to income, access to non-cash benefits, length of stay in the program, and where clients exit to when they leave projects.
5. **Subpopulation Information** – information only on specific subpopulations (veterans, persons experiencing chronic homelessness, and youth).
6. **Financial Information** – information about project funding and expenditure and match amounts.
7. **Narrative** – descriptive information about the project and accomplishments.
8. **HMIS-dedicated Projects** – basic information about HMIS implementation.
9. **Planning Grant Projects** – basic information on recipients of CoC Planning grants.
10. **Coordinated Entry Projects** – basic information on recipients of Supportive Services Only grants dedicated to Coordinated Entry.
11. **Unified Funding Agency Projects** – basic information on recipients who have been designated as Unified Funding Agencies (UFAs).

A.2.2 System-Level Performance Measures for Continuums of Care

CoCs will report aggregated performance data for the homeless assistance provided within their geographic area, including projects that receive HUD homeless assistance funding via the CoC Program and the ESG Program, as well as other federally-funded homeless assistance programs and non-federally funded homeless assistance programs. Local projects that assist persons who

are homeless or at-risk of homelessness and participate in a CoC's HMIS will be included in system-level performance reporting.

Each CoC will be required to submit data on the system-level performance measures on an annual basis. The reporting period will be standard for all CoCs (October 1-September 30), with the exception of PIT count data collected according to HUD specifications during the fiscal year (or the prior year for communities conducting their unsheltered counts biennially).

The reporting period establishes the universe of clients for which the measures are calculated, but often the data collection period extends beyond the reporting period, depending on the measure. For example, to report on persons who become homeless for the first time, CoCs need to look back in the system to determine if a person was in the HMIS prior to the reporting period.

All system-level performance data will be submitted by CoC authorized representatives to HUD electronically via HUD's Homelessness Data Exchange (HDX). The data will be used by HUD to assess the performance of the CoCs system of care and to inform the Department's competitive process for homeless assistance funding. Data from these reports will also be aggregated across CoCs to report on national performance and outcomes for HUD staff, other federal agencies, the Congress, and the Office of Management and Budget.

Item-by-Item Justification

Detailed justification of each data element requested in the system-level performance measures is contained in Attachment B.

The system-level performance measures include the following measures:

Measure 1: Length of Time Persons Remain Homeless

Measure 2a: The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness within 6 to 12 Months

Measure 2b: The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness within 2 Years

Measure 3: Number of Homeless Persons

Measure 4: Employment and Income Growth for Homeless Persons in CoC Program-funded Projects

Measure 5: Number of Persons who Become Homeless for the First Time

Measure 6: Homelessness Prevention and Housing Placement of Persons Defined by Category 3 of HUD's Homeless Definition in CoC Program-funded Projects

Measure 6a: Preventing Returns to Homelessness within 6 and 12 Months Among This Subset of Families and Youth

Measure 6b: Preventing Returns to Homelessness within 24 Months Among This Subset of Families and Youth

Measure 6c: Successful Housing Placement Among This Subset of Families and Youth

Measure 7a: Successful Placement from Street Outreach

Measure 7b: Successful Placement in or Retention of Permanent Housing

A.2.3 Performance Data Check-up

HUD requires CoCs, HMIS lead agencies, and project recipients to report data annually. CoCs and project recipients have requested an opportunity to provide feedback to HUD regarding data collection. HUD strives to understand how the data collection process is working and what challenges CoCs and project recipients are facing. HUD is creating a performance data check up to provide a feedback opportunity between HUD, CoCs, HMIS lead agencies, and project recipients.

HUD will conduct a performance check-up no more than annually. This check up will be administered to all CoCs (400), HMIS lead agencies (400), and up to 600 recipients.

This survey will be administered electronically either through HUD's Homelessness Data Exchange (HDX) or another electronic survey tool (e.g., Survey Monkey). The data will be used by HUD to assess how communities are collecting, reporting, and using data in their communities as well as to get feedback about how HUD can improve its process for understanding CoC and project performance. Data from these reports will also be aggregated across CoCs and recipients to analyze CoC and project recipient data collection.

Item-by-Item Justification

Detailed justification of each data element requested in the Performance Data Check-up is found in Attachment C.

A3 Improved Information Technologies

Describe whether, and to what extent, the collection of information is automated (item 13b1 of OMB form 83-i). If it is not automated, explain why not. Also describe any other efforts to reduce burden.

A.3.1 APR for HUD's CoC

Program

As described in Section A.2.1 above, HUD is implementing a major improvement in information technologies at this time. APRs will be submitted via a web-based reporting tool integrated into HUD's Sage system. To increase the accuracy of the data and reduce burden on grantees, the system will have the following capabilities:

1. ***Some Performance Report information will be pre-filled.*** The APR will be linked to information provided on the original application and LOCCS. Portions of the APR will be pre-filled with information from these sources.

2. **CSV import functionality.** The Sage system allows recipients to import their data directly from their local HMIS via a CSV import. This saves recipients the time it would take to enter the data manually. It also increases accuracy because the data comes directly from the system and cannot be manipulated once uploaded.
3. **Built-in data quality checks.** The Sage system will check for data consistency and accuracy as grantees and/or project subrecipients complete the APR and will identify potential data issues for the user prior to submission. This data quality check applies to both the data entered manually about the project and the data uploaded via CSV import.
4. **Use of pick-lists or drop-down menus.** The APR will contain drop-down menus where applicable to facilitate reporting and improve data quality.
5. **Automated calculations.** Rows or columns shaded in grey will be automatically calculated and thus do not require data entry or manual calculations.
6. **Other key features include:**
 - Secure data entry 256-bit SSL encryption for communications between the servers and web browsers. User login, save/review, and submit—including user registration with authorizing grantee official verification; data entry, review, edit prior to final submission; and data submission date/time stamp.
 - All pages which are loaded (with the exception of the CSV testing functionality and CAPER hyperlinks) are logged with the user accessing the page, the URL, the user's ID, IP address, and web browser version. Additionally, when the user-entered data is edited Sage saves the previous version of the record along with the user ID and date stamp of who entered the previous and current records.
 - Electronic approval by authorizing grantee and sponsor officials.
 - Navigation to access different sections/tables sequentially or non-sequentially.
 - Help/look-up features—including HELP link to Performance Report instructions, definitions, or the HMIS Data Standards; RESOURCES tab with a link to the full Performance Report instructions; and integrated Help Desk support HUD's Ask A Question (AAQ) portal.
 - Integrated method for HUD review and approval—including interactive messaging with grantee contact to address questions/corrections; and HUD review and approval date/time stamp with grantee notification.
 - Extensive reporting functionality for CoC's and HUD to query and analyze data by program and component types.

A.3.2 System-Level Performance Measures for Continuums of Care (CoCs)

As described in Section A.2.2 above, CoCs will submit their system-level performance data electronically, through HUD's HDX website. Currently, CoCs use the HDX to submit the

AHAR, PIT count, and HIC data to HUD. The addition of system-level performance measures requires the development of a new module on the HDX website, but the user interface and log-in process will remain the same for CoCs as what they currently utilize to submit their AHAR, PIT, and HIC data to HUD. To increase the accuracy of the data and reduce burden on CoCs, the HDX will have the following capabilities:

1. ***Some Performance Report information will be pre-filled.*** Since some of the system-level performance measures include data from the PIT count, which is already entered into HDX by CoCs, this data will be pre-populated for those measures.
2. ***CSV import functionality.*** The HDX system allows CoCs to import their data directly from their local HMIS via a CSV import. This saves recipients the time it would take to enter the data manually. It also increases accuracy because the data comes directly from the system and cannot be manipulated once uploaded. If a recipient is unable to submit a CSV file it can manually enter the data in HDX.
3. ***Built-in data quality checks.*** The HDX system will check for data consistency and accuracy as CoCs enter their data into the website. HDX will identify potential data issues for the user prior to submission.
4. ***Automated calculations.*** Rows or columns shaded in grey will be automatically calculated and thus do not require data entry or manual calculations.
5. ***Other key features include:***
 - Secure data entry (128-bit encryption).
 - User login, save/review, and submit—including user registration with authorizing CoC representative; data entry, review, edit prior to final submission; and data submission date/time stamp.
 - Electronic signature/approval by representative of the CoC.
 - Navigation to access different sections/tables sequentially or non-sequentially.
 - Help/look-up features—including highlight text linked to system-level performance measure instructions, definitions, or the HMIS Data Standards; a link to resources and guidance on the measures; and integrated Help Desk support through HUD’s Ask A Question (AAQ) portal.
 - Integrated method for HUD review and approval—including interactive messaging with CoC to address questions/corrections; and HUD review and approval date/time stamp with grantee notification.

A.3.3 Performance Data Check-up

Program

As described in Section A.2.3 above, HUD is implementing a feedback mechanism regarding performance data. HUD will collect the data electronically.

A4 Duplication of Similar Information

Is this information collected elsewhere? If so, why cannot any similar information already available be used or modified?

The APR for the CoC Program is the only annual report that HUD requires CoC Program-funded projects to submit for HUD to evaluate project performance and outcomes.

The system-level performance measure data are not duplicative of any existing system-wide performance data currently collected by HUD. While the AHAR provides HUD with community-level data on homelessness, it is not able to provide data on any of the six performance indicators that HUD is required to collect data on from CoCs. The system-level performance measures provide HUD data on the performance-based selection criteria required by the section 427(b)(1)(A) of McKinney-Vento Homeless Assistance Act, as amended, and will allow HUD to compare this data among various CoCs and improvements between reporting periods.

The information in the performance check up is not currently collected anywhere else. HUD often talks with its CoCs, HMIS lead agencies, and project recipients regarding these issues but there is currently no formal mechanism to collect the data. The performance data check up will provide a regular feedback mechanism between HUD, CoCs, and project recipients.

A5 Small Businesses

Does the collection of information impact small businesses or other small entities (item 5 of OMB form 83-i)? Describe any methods used to minimize burden.

No small businesses are involved as respondents to this data collection effort. HUD's APRs are completed by recipients and subrecipients receiving HUD homeless assistance funding through the CoC Program and YHDP.

System-level performance data will be provided by authorized representatives of local Continuums of Care.

The performance data check-up would be completed either by project recipients, HMIS lead agencies, or authorized representatives of local Continuums of Care.

A6 Less Frequent Data Collection

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.

Historically, HUD has used the APR for homeless assistance programs to evaluate all homeless assistance projects on an annual basis (except that annual reporting under the Emergency Solutions Grants is done via the Consolidated Annual Performance and Evaluation Report (CAPER)). Less frequent data collection would significantly reduce HUD's ability to assess program performance and ensure compliance with program requirements and federal regulations and would weaken HUD's ability to analyze how projects are contributing to the goal of ending homelessness.

With respect to system-level performance data, HUD is complying with the McKinney-Vento Homeless Assistance Act to collect data on these system indicators as part of the CoC Program competition. Further, collection of this data on a less frequent basis may compromise the quality of the data that are collected and limit the ability of HUD to see national trends in the data.

HUD is implementing the performance data check up in response to requests from CoCs and project recipients. Additionally, this would provide a systematic feedback process for recipients.

A7 Special Circumstances

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320.6 (Controlling Paperwork Burden on the Public—General Information Collection Guidelines). There are no special circumstances that require deviation from these guidelines.

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

- 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. **N/A**

A8 Federal Register Notice/Outside Consultation

Identify the date and page number of the Federal Register notice (and provide a copy) soliciting comments on the information. Summarize public comments and describe actions taken by the agency in response to these comments. Describe all efforts to consult with persons outside the agency.

Published in the Federal Register on July 21, 2021, Vol 86, page 16650. No comments were received.

Outside consultations related to the proposed data collection effort are described below.

A.8.1 APR for HUD's CoC Program: Field Office Consultation

In the course of updating the APR, HUD conducted consultations with staff from HUD headquarters and its field offices in 2014. A total of three meetings were held with Field Offices, with approximately 15 to 20 Field Office staff in attendance at each meeting.

A9 Payment/Gift to Respondents

Explain any payments or gifts to respondents, other than remuneration of contractors or grantees.

HUD does not provide remuneration to recipients for completion and submission of APRs or local system-level performance measure data reported through HDX or the performance data check-up.

A10 Confidentiality

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

The APR, the system-level performance data, and performance data check-up responses contain only aggregated data on the number and characteristics of persons receiving homeless assistance services. These reports do not contain any protected personal information.

A11 Sensitive Questions

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

The APR, system-level performance measures, and performance data check-up do not include questions of a sensitive nature for HUD grantees or subgrantees.

A12 Burden Estimate (Total Hours and Wages)

Estimate public burden: number of respondents, frequency of response, annual hour burden. Explain how the burden was estimated.

The exhibits below demonstrate how the public burden for the APR and the system-level performance measure data were calculated. The total burden for data collection for the reports and the performance check-up over a one-year period, including quarterly reporting for 50 unsheltered grant recipients and 400 CoCs doing a performance check-up, is estimated at 50,530 hours, which is a decrease from the estimated burden of 234,800 for completing the APR under the last clearance (OMB Approval No. 2506-0145).

A.12.1 Burden Estimates for APR for HUD's Homeless Assistance Programs

Exhibits A-1 provides information on the estimated time and expenses necessary to compile data and complete the revised APRs for all homeless assistance programs for a one-year period. The specific questions being asked in the APR are outlined in Attachment A. Total burden for data collection over one year for the APRs is estimated at 43,000 hours. The CoC Program APRs are collected annually, while the YHDP reports are collected on a quarterly basis (and an annual report is also submitted). Grants awarded under the Special CoC NOFA will be subject to a quarterly reporting requirement. The YHDP and Special CoC NOFA projects are unique funding streams that have higher collection burdens because they are on issues that require more frequent feedback. HUD needs to understand as quickly as possible if the interventions are working so that it can provide guidance or other corrections to program implementation as early as possible. The average annual burden for recipients of HUD Continuum of Care Program funding (not-for-profit organizations and state and local governments), including YHDP and Special CoC NOFA grant funding, that complete an APR is 5.1 hours at a cost of \$186.98.

The burden estimates for the re-designed APR represents an overall decrease in respondent burden for recipients of HUD's homeless assistance funds compared to the Annual Progress Report (OMB Approval No. 2506-0145). That report had an estimated burden of 234,800 hours for 8,000 homeless assistance providers, or an average estimated burden of 29.35 hours per respondent.

Exhibit A-1: Estimated Annualized Burden Hours and Cost for Annual Performance Reports

Information Collection	Number of Respondents	Frequency of Response	Responses per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Annual Performance Report (CoC Program) - Non-profit Recipients	4,000.00	1	4,000.00	4.00	16,000.00	\$44.57	\$713,120.00
Annual Performance Report (YHDP) - Non-profit Recipients	200.00	5	1,000.00	5.00	5,000.00	\$44.57	\$222,850.00
Performance Report (Special CoC NOFA Grants) - Non-profit Recipients	25.00	5	125.00	4.00	500.00	\$44.57	\$22,285.00
Annual Performance Report (CoC Program) - State and Local Recipients	4,000.00	1	4,000.00	4.00	16,000.00	\$44.57	\$713,120.00
Annual Performance Report (YHDP) - State and Local Recipients	200.00	5	1,000.00	5.00	5,000.00	\$44.57	\$222,850.00
Performance Report (Special CoC NOFA Grants) - State and Local Recipients	25.00	5	125.00	4.00	500.00	\$44.57	\$22,285.00
Total	8,450.00		10,250.00		43,000.00		\$1,916,510.00

*Hourly wage rates are based on the 2020 Occupational Employment and Wages published by the Department of Labor (3/31/2021). The median hourly wage rates in Exhibit A-2 represent the average of "Project Management Specialists and Business Operations

Specialists, All Other” (\$40.53/hr) and “Database Administrators and Architects” (\$48.60), assuming an equal proportion of hours required to complete the Performance Report per occupational type.

A.12.2 Burden Estimates for the System-Level Performance Measures

HUD expects that every CoC (currently there are 400 CoCs nationwide) will submit system-level performance measures data annually. The specific questions being asked in the system performance measures report are outlined in Attachment B.

The effort involved in submitting data on the system-level performance measures will vary from community to community depending on technology used and staff capacity. Fortunately, almost all communities now use systems that are able to produce automated reports. A relatively small number of communities must manually run reports to extract system-level performance data. For this reason, the estimated annualized burden estimate is divided into two categories: 1) communities that use their HMIS software systems to directly import their report into HDX; and 2) communities that can’t import their data directly into HDX that must run their report in their local HMIS and manually enter their data into HDX.

The burden estimates for each group are as follows (as outlined in Exhibit A-2):

- Group 1: Communities that import reports: 13 hours for the annual report.
- Group 2: Communities that manually enter reports: 15 hours for each annual report.

The estimated annualized cost for a CoC that has software with an automated report function (Group 1) is \$579.41 (13 burden hours per response multiplied by \$44.57, which is the hourly cost per response). The estimated annualized cost for other CoCs (Group 2) is \$668.55 (15 burden hours per response multiplied by \$44.57, which is the hourly cost per response).

Exhibit A-2: Estimated Annualized Burden Hours and Cost for the System-Level Performance Measures

Information Collection	Number of Respondents	Frequency of Response	Responses per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Group 1: CoCs with Automated Software Report	385.00	1	385.00	13.00	5,005.00	\$44.57	\$223,072.85
Group 2: CoCs with Manual Software Report	15.00	1	15.00	15.00	225.00	\$44.57	\$10,028.25
Total	400.00		400.00		5,230.00		\$233,101.10

*Hourly wage rates are based on the 2020 Occupational Employment and Wages published by the Department of Labor (3/31/2021). The median hourly wage rates in Exhibit A-2 represent the average of “Project Management Specialists and Business Operations

Specialists, All Other” (\$40.53/hr) and “Database Administrators and Architects” (\$48.60), assuming an equal proportion of hours required to complete the Performance Report per occupational type.

A.12.3 Burden Estimates for the Performance Data Check-up

HUD will provide every CoC (currently there are 400 CoCs nationwide), HMIS lead agency (around 400) and up to 600 project recipients the opportunity to submit a performance data check-up no more than once annually. The specific questions being asked in the APR are outlined in Attachment C.

The effort to submit responses does not require the respondent to refer to external data. It is intended to be a quick opportunity for the respondent to provide feedback. It is anticipated that this will take no more than 1 hour for the CoCs and HMIS lead agencies who will be answering questions about the entire system and 30 minutes for project recipients who will only be answering questions with respect to their projects and the respondents will be business operations specialists as opposed to technical personnel.

The burden estimate for respondents is outlined in Exhibit A-3. The burden estimate for all 400 CoCs, all 400 HMIS lead agencies, and for 600 project recipients per year is approximately 1 hour for CoCs and HMIS leads and 30 minutes for project recipients. The estimated annual cost for CoCs and HMIS leads is \$40.53 and \$20.27 for project recipients.

Exhibit A-3: Estimated Annualized Burden Hours and Cost for Performance Data Check-up

Information Collection	Number of Respondents	Frequency of Response	Responses per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
CoCs	400.00	4	1,600.00	1.00	1,600.00	\$40.53	\$64,848.00
HMIS Lead Agency	400.00	1	400.00	1.00	400.00	\$40.53	\$16,212.00
Project Recipients	600.00	1	600.00	0.50	600.00	\$40.53	\$12,159.00
Total	1,400.00		2,600.00		2,300.00		\$93,219.00

*Hourly wage rates are based on the 2020 Occupational Employment and Wages published by the Department of Labor (3/31/2021). The hourly wage rates in Exhibit A-2 represent the average of “Project Management Specialists and Business Operations Specialists, All Other” (\$40.53/hr).

A13 Capital Costs

Estimate the annual capital cost to respondents or record keepers.

There are no capital costs for respondents beyond customary or usual business practices or that are not otherwise required to achieve regulatory compliance not associated with the collection of information for purposes of completing the APRs or the system-level performance measure data.

A14 Cost to the Federal Government

Estimate annualized costs to the Federal government.

The exhibits below demonstrate the estimated annualized cost to the federal government to administer and review the project performance reports and the system-level performance measure. The total estimated annualized cost to the federal government for the reports and the performance check-up over a one-year period, including quarterly reporting for YHDP and 50 Special CoC NOFA grant recipients and 400 CoCs doing a performance check-up, is estimated at 16,750 hours for \$546,960.

A.14.1 Federal Government Cost Estimates for APR for HUD’s Homeless Assistance Programs

HUD reviews every single performance report. The CoC APRs are reviewed by HUD’s local field office staff while HUD’s headquarters staff reviews the YHDP and Special CoC NOFA grant reports. HUD staff are only required to look at a few screens to ensure compliance but may review the entire report when they feel further questions need to be answered about the grant. When questions or issues arise, HUD staff work with recipients to resolve outstanding concerns.

The annualized cost estimate for federal government staff to review HUD Continuum of Care Program reports, including YHDP and Special CoC NOFA grant funding, is 1 hour per report at a cost of \$29.21 per report.

Information Collection	Number of Respondents	Frequency of Response	Responses per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Annual Performance Report (CoC Program)	8,000.00	1	8,000.00	1.00	8,000.00	\$26.72	\$213,760.00
Annual Performance Report (YHDP)	400.00	5	2,000.00	1.00	2,000.00	\$38.08	\$76,160.00
Performance Report (Special CoC NOFA Grants)	50.00	5	250.00	1.00	250.00	\$38.08	\$9,520.00
Total	8,450.00		10,250.00		10,250.00		\$299,440.00

*Hourly wage rates are based on federal employees paid under the 2021 General Schedule (GS). Reports reviewed by HUD Field Office employees are assumed to be at GS-11, step 1 (\$26.72/hr). Reports reviewed by HUD headquarters employees are assumed to be at GS-13, step 1 (\$38.08/hr).

Additionally, HUD has a contract with a women-owned small business to develop, operate and support the *Sage HMIS Reporting Repository*. The estimated annual cost is \$300,000. The activities covered in this estimate include: managing data received from various HUD sources weekly, monthly, and annually; scrubbing data for import; assistance to recipients and CoCs with APR submissions; manual intervention of data import, and specialized functionality to account for reporting on special programs including: Single Room Occupancy, legacy programs, multi-year grants, and 15-20 year use requirements; system maintenance and correction, co-location hosting and security of servers through Azure; and annual updating for CoC program changes.

A.14.2 Federal Government Cost Estimates for the System-Level Performance Measures

HUD uses the data from the system performance measures as part of its annual CoC Program Competition. This data is reviewed by HUD headquarters staff for completeness and to understand the quality of the data as well as trends in the data

The annualized cost estimate for federal government staff to review system-level performance measures reports is 1 hour per report at a cost of \$38.08 per report.

Information Collection	Number of Respondents	Frequency of Response	Responses per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
System Performance Measures Reports	400.00	1	400.00	13.00	5,200.00	\$38.08	\$198,016.00

*Hourly wage rates are based on federal employees paid under the 2021 General Schedule (GS). Reports reviewed by HUD headquarters employees are assumed to be at GS-13, step 1 (\$38.08/hr).

HUD has a contract with a private research firm to collect System Performance Measures data and prepare a yearly data summary. The estimated annual contractor cost is \$400,000. The activities that are covered in this estimate include: maintaining and updating the database to store the System Performance Measures data; providing technical assistance to communities when questions about the System Performance Measures data arise; analyzing the data; and preparing the national summary report and an Excel file with all CoC data.

A.14.3 Federal Government Cost Estimates for the Performance Data Check-up

There is a continual need to understand how to improve data collection and reporting. HUD recipients have requested options for providing feedback. HUD headquarters staff will review the feedback from recipients.

The annualized cost estimate for federal government staff to review system-level performance measures reports is .5 hours per report at a cost of \$19.04 per report.

Information Collection	Number of Respondents	Frequency of Response	Responses per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Review of feedback from CoCs	400.00	4	1,600.00	0.50	800.00	\$38.08	\$30,464.00
Review of feedback from HMIS Lead Agencies	400.00	1	400.00	0.50	200.00	\$38.08	\$7,616.00
Review of feedback from Project Recipients	600.00	1	600.00	0.50	300.00	\$38.08	\$11,424.00
Total	1,400.00		2,600.00		1,300.00		\$49,504.00

*Hourly wage rates are based on federal employees paid under the 2021 General Schedule (GS). Reports reviewed by HUD headquarters employees are assumed to be at GS-13, step 1 (\$38.08/hr).

A15 Program or Burden Changes

Explain any program changes or adjustments in burden.

The reporting burden in the most recent PRA package was 234,800 hours. The total burden hours for this reinstatement has been reduced to 50,530 hours. The main reason for this change is the automation of the data submissions. In the past, CoCs and project recipients were manually entering data in the submission to HUD.¹ HUD updated how it receives data to require CoC Program, YHDP, and Special NOFA grant recipients to import the majority of the data for the APRs directly into the reporting system. HUD also requires CoCs to import their system performance measures into the reporting system. These updates to the way data is submitted to HUD resulted in a decrease of 184,270 hours.

A16 Publication and Tabulation Dates

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

A.16.1 APR for HUD's Homeless Assistance Programs

APR data will be entered and stored in the Sage system. HUD staff will review and assess each APR individually to determine compliance with HUD regulations and grantee agreements. Aggregated data from the APRs will be analyzed to report to Congress, OMB, and other

¹ At that time, there were no YHPD or Special CoC NOFA grants awarded.

stakeholders on program performance on an as requested basis. This data will inform HUD's work to improve how it partners with communities to improve their efforts to end homelessness.

A.16.2 System-Level Performance Measures for CoCs

Data for the system-level performance measures will be entered into the HDX system. Each CoC will report their data once the reporting period ends on September 30th. At that point, the data will be reviewed by HUD staff and the CoCs will verify its accuracy. HUD will analyze the data and report to Congress, OMB, and other stakeholders on performance on an as requested basis. This data will inform HUD's work to improve how it partners with communities to improve their efforts to end homelessness.

HUD publishes the system-level performance measures for each CoC as well as in national form. The data is published 6 months after submitted to HUD. The CoC-level data is published in a spreadsheet to allow members of the public to download the data and conduct their own analysis. The national data is published in the form of a report with visualizations to provide historical context and the ability for the public to see changes over time.

A17 Expiration Date

Explain any request to not display the expiration date.

The OMB expiration date will be displayed on all data collection instruments. No exceptions are requested.

A18 Certification Statement

Explain each exception to the certification statement identified in item 19.

There are no exceptions to the certification.