

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

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The currently approved HOPWA paperwork collection is under OMB Control Number 2506-0133. HUD is requesting a revision of the currently approved collection. This revision request would phase-in the replacement of forms HUD-40110-C (Annual Progress Report (APR) for competitive and renewal grantees), HUD-40110-D (Consolidated Annual Performance and Evaluation Report (CAPER) for formula grantees) with the attached data elements in this submission. These data elements will be used in both a new Excel form, and a new Word form for Section 508 accessibility. The data elements in this revision represents a consolidation of the HUD-40110-C and HUD-40110-D, as well as additions, deletions, and modifications to the current data elements contained within these two forms. The revision also requests to add form SF424D for HOPWA competitive grants that may utilize funding for new construction or rehabilitation, and adjust the burden accordingly.

The currently approved HUD-40110-C and HUD-40110-D paperwork collection is for HOPWA annual reporting requirements. In addition to the record keeping requirements cited below, grantees with HOPWA facilities under stewardship are also required to report until the minimum use period is met for the facility. The HOPWA statute and corresponding regulations requiring reporting and recordkeeping are listed below:

- 42 U.S.C. 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. Performance reports.
 - (a) Formula grants. For a formula grant recipient, the performance reporting requirements are specified in 24 CFR part 91.
 - (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.
- 24 CFR 91.520(f). HOPWA. For jurisdictions receiving funding under the Housing Opportunities for Persons With AIDS program, the report must include the number of individuals assisted and the types of assistance provided, as well as 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.

- 24 CFR 574.530. Recordkeeping. Each grantee must ensure that records are maintained for a 4-year period to document compliance with the provisions of this part. Grantees must maintain the following:
 - (a) Current and accurate data on the race and ethnicity of program participants.
 - (b) Documentation related to the formula grantee's Assessment of Fair Housing, as described in 24 CFR 5.168.
 - (c) 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.

The other information collections currently approved under this OMB Control Number will remain unchanged. Those information collections are: HOPWA Renewal Application (including HUD-40110-B, narratives, and other requirements listed in the renewal notice); HOPWA Competitive Application (including HUD-40110-B, narratives, and other requirements listed in the NOFA); HIV Housing Care Continuum Model Report (HUD-4154) ; Housing as an Intervention to Fight AIDS Model Report (HUD-4153); Recordkeeping for Competitive, Renewal, and Formula Grantees; and Grant Amendments. HOPWA competitive and renewal application submission also continue to require submission of the following forms currently approved under this collection: SF-424 and SF-424B assurances; SFLLL; and HUD-2991.

The Office of HIV/AIDS Housing (OHH) requests that the data elements in this submission not immediately replace current forms HUD-40110-C and HUD-40110-D, but that the new data elements be phased in as HOPWA grantees complete their active reporting year and subsequent reporting year using the previously approved forms HUD-40110-C and HUD-40110-D. If the new data elements immediately replaced the previous forms upon the approval of this revision request, this would result in a substantial change in grantee reporting requirements in the middle of their reporting years and would not provide grantees with adequate opportunity to plan for the new requirements. To ease the transition and avoid confusion, OHH therefore requests that grantees be allowed to complete their current reporting year and subsequent reporting year using the previous forms, and switch to the new data elements at the beginning of the second reporting year after these changes are approved. This will allow grantees over a year to plan for the changes represented in this package. This does not represent a duplication in reporting requirements.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The current Paperwork Reduction Act approval under OMB Control No. 2506-0133 covers both the HOPWA formula and competitive grant programs. This revision would apply to reporting requirements for both formula and competitive grant programs, and application submission for the competitive grant program.

For annual reporting, HOPWA grantees complete reporting forms by providing information on activities undertaken, number of clients served, funds expended, and accomplishments achieved. This information 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. Grantees are required to report on the activities undertaken only, thus there may be components of these reporting requirements that may not be applicable to every grantee.

The data elements in this submission represent the new annual reporting requirements for both HOPWA formula and competitive grantees, and represent a consolidation of the data elements in HUD-40110-C and HUD-40110-D. Compared to the HUD-40110-C and HUD-40110-D, the data elements in this submission represent data additions, deletions, and modifications that further clarify reporting requirements. The addition of new data elements will allow OHH to better respond to data

calls from Congress and to make better programmatic decisions based on more relevant grantee annual data.

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. HUD plans to continue using the data elements in this submission for these purposes.

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 SF-424B assurances; SFLLL; SF-424D; and HUD-2991. Form HUD-2991 is currently covered under OMB approval number 2506-0112. This revision will also include the SF-424D to include assurances for constructions programs for HOPWA competitive grants that may utilize funding for new construction or rehabilitation.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

The data elements in this submission will be used in both a new Excel form, and a new Word form for Section 508 accessibility. Currently, the APR and CAPER forms are paper-based forms that grantees must complete and submit to HUD via email. The Excel form will ease grantee reporting burden by automating certain processes, such as calculating totals, and pre-populating certain cells with information the grantee previously entered, which eliminates duplicative data entry. The Excel form will also produce higher quality data, as it allows for built-in data checks for accuracy, and eliminates the possibility of math errors by automating calculations.

Currently, grantees must aggregate annual data across their project sponsors manually into the paper-based form. The Excel form will eliminate the need for grantees to aggregate data across project sponsors, as project sponsor data will now be submitted in separate reporting forms and the reporting aggregation for each grant will be done automatically in the HOPWA database, eliminating the need for grantee manual aggregation. The reduction of reporting burden was the primary reason for choosing an Excel-based form for the new annual reporting form. The Word version of the form will use the exact same data elements as the Excel form, but will be 508 compliant for accessibility. The Word version of the new form will not contain the automation of the Excel version.

Currently, completed APRs and CAPERs are submitted by grantees via email to HUD, and data elements are entered manually into an Access Database system. The Excel-based consolidated APR/CAPER will allow for a data upload into the HOPWA Access database, eliminating user data entry errors. The capability to upload data will be more efficient and less costly when processing HOPWA data.

OHH is seeking approval for this information collection in the form of a data table instead of as a specific form, in order to allow for the possibility of collecting these elements from new or existing computer systems, when possible and as the funding to adapt existing systems and/or purchase new software systems becomes available. These actions will further alleviate grantee reporting burden.

4. Describe any efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The APR and CAPER forms are the only annual reporting forms required of HOPWA grantees. HOPWA output and performance data is not collected anywhere else.

The elements in this submission represent a consolidation of the APR and CAPER forms. Currently, the separate APR and CAPER forms collect very similar information. While the current similarity of the different forms does not represent a duplication of burden for grantees (grantees only complete one of the forms based on whether they receive competitive or formula HOPWA funds) the consolidation of the two forms will reduce confusion about the two forms and standardize the information collected across all HOPWA grantees.

5. If the collection of information impacts small business or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

Small business or other small entities will not be impacted by the consolidation of the APR and CAPER forms or the conversion of these forms into an Excel form. Eligibility for HOPWA formula and competitive grants is limited to States, units of local governments, and non-profits. While some non-profits may be small entities, the automation features in the new Excel version of the consolidated APR and CAPER is expected to keep reporting burden either the same or slightly less than the current Word versions of these forms.

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.

All grantees receiving HOPWA funding must maintain compliance through reporting and recordkeeping as required through HOPWA statute and regulations. APR and CAPER performance reports are collected and analyzed on an annual basis per HOPWA regulations and are used to assess grantee performance, draft budget justifications, and to report to congress on program activities and performance accomplishments. Less frequent submission of information would considerably hinder the mission, efficiency, and legal aspects of program management. Information on the performance reports are used by HUD field offices, grantees, and the public. These forms serve as an accountability tool and allow HUD to monitor and evaluate the HOPWA Program. HOPWA grantees may also use the information to justify additional resources from state and local government and also to inform public awareness and support of their program. Annual reporting by grantees is a HOPWA statutory and regulatory requirement.

7. Explain any special circumstances that would cause an information collection to be conducted in any of the different manners outlined in form 83-I.

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. Grantees are only required to report annually. **n/a**

- This information collection does not require respondents to prepare a written response in fewer than thirty days after they receive the request. Grantees are required to submit their reporting forms 90 days after the end of their operating year. *n/a*
- This information collection does not require respondents to submit more than an original and two copies of any document. Grantees submit their completed forms by emailing the HOPWA inbox and “cc-ing” their HUD field office representative. *n/a*
- This information collection is not conducted in connection with any statistical survey, designed to produce reliable results that can be generalized to the universe of the study, or otherwise. *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 October 30, 2020 in vol 85, page 68912. HUD received 0 comments.

9. Explain any decision to provide any payment or gift 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.

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. Provide estimates of the hour burden and annualized costs of the collection of information for Grant Recipients.

The public reporting burden for this collection of information is estimated to average 40.0 hours, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

APR and CAPER Reports for HOPWA formula grantees and competitive grantees provide HUD with annual information to support program evaluation and measure program beneficiary outcomes related to maintaining housing stability; preventing homelessness; and improving access to care and support. This collection of information consolidates the information in the APR and CAPER reports and clarifies reporting requirements, which will allow HUD’s Office of HIV/AIDS Housing to better respond to data calls from Congress and make better program decisions based on more relevant grantee annual data. Reporting is required for all HOPWA grantees pursuant to 42 U.S.C. § 12911; 24 CFR §§ 574.520(a) and (b); 24 CFR § 91.520(f). The information collected regarding grantees, their respective project sponsors, and the identities of HOPWA program participants will remain confidential pursuant to 42 U.S.C. § 12905(e) and 24 § CFR 574.440.

Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to Colette Pollard, Reports Management Officer, Department of Housing and Urban Development, 451 7th Street SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Control No. 2506-0133. HUD may not conduct and sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid OMB Control Number.

This chart reflects the public burden for OMB approval 2506-0133 adjusted to represent a phase-in of the new consolidated APR/CAPER data elements represented in this submission (see “New consolidated data elements (HUD-4155)” line). After completion of a full reporting year using the currently approved HUD-40110-C and HUD-40110-D reporting forms, the new consolidated APR/CAPER represented in this submission will be submitted annually by all 128 formula grantees, 82 competitive renewal grantees, eight (8) current HOPWA competitive grantees, and 26 expected new competitive SPNS grantees.

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
SF-424	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SF-424B	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SF-LLL	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SF-424D	0.00	0.00	0.00	0.00	0.00	0.00	0.00
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
New consolidated data elements (HUD-4155)	244.00	1.00	244.00	40.0	9,760.00	\$25.35	\$247,416.00
HUD-40110-C Annual Progress Report (APR)	116.00	1.00	116.00	55.00	6,380.00	\$25.35	\$161,733.00
HUD-40110-D Consolidated Annual Performance and Evaluation Report (CAPER)	128.00	1.00	128.00	41.00	5,248.00	\$25.35	\$133,036.80

HUD-4154, HIV Housing Care Continuum Model Report (new competitive SPNS grant only)	26.00	1.00	26.00	20.00	520.00	\$25.35	\$13,182.00
HUD-4153, 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
Total	882.00	-	882.00	-	39,988.00	-	\$1,013,695.8

HOPWA grantees and applicants may be required to respond to more than one piece of information collection. 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. 9,760 hours * \$25.35 = \$247,416.00

There are no updates to the estimated burden hours or costs to the other documents under this OMB approval number.

13. Estimate of the average, annual cost beyond the cost of hour burden shown in Items 12.

The only additional known cost is the staff hours needed to become acquainted with and trained on the new consolidated APR/CAPER data elements in Excel format. This additional cost will only be for the first year that grantees use the new Excel form.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Staff hours to be trained on the new consolidated APR/CAPER data elements in Excel format	244.00	1.00	244.00	10	2,440.00	\$25.35	\$61,854.00

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
SF-424	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SF-424B	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SF-LLL	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SF-424D	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Review of HOPWA Competitive Application (including HUD-40110-B and narratives)	40.00	1.00	40.00	30.00	1200.00	\$41.37	\$49,644.00
Awarding of Competitive and Renewal Grants	54.00	1.00	54.00	10.00	540.00	\$41.37	\$22,339.80
Review of new consolidated data elements (HUD-4155)	244.00	1.00	244.00	11.00	2,684.00	\$41.37	\$111,037.08
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
HUD-4154, 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
HUD-4153, 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

Total	936.00			-	10,312	-	\$426,607.44
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This chart reflects the cost to the federal government for OMB approval 2506-0133 adjusted to represent a phase-in of the new consolidated APR/CAPER data elements represented in this submission (see “New consolidated data elements (HUD-4155)” line above for the added information).

All annualized costs reflect staff time spent on tasks in the table. The hourly rate is based on a GS-12 in Washington, DC. 10,312 hours * \$41.37 = \$426,607.44

There are no updates to the estimated costs to the other documents under this OMB approval number.

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 annual reporting burden associated with the Housing Opportunities for Persons With AIDS (HOPWA) Program. This submission is requesting to replace forms HUD-40110-C (Annual Progress Report (APR) for competitive and renewal grantees), and HUD-40110-D (Consolidated Annual Performance and Evaluation Report (CAPER) for formula grantees) from this OMB Control Number and replace those forms with the data elements in this submission. The data elements in this submission represent a consolidation of the data elements in the HUD-40110-C and HUD-40110-D, as well as data additions, deletions, and modifications to further clarify reporting requirements.

The data elements in this submission will be used in both an Excel-based form and an alternative paper form for Section 508 accessibility. The Excel form will ease grantee reporting burden by automating certain processes, such as calculating totals, and pre-populating certain cells with information the grantee previously entered, which eliminates duplicative data entry. The Excel form will also produce higher quality data, as it allows for built-in data checks for accuracy, and eliminates the possibility of math errors by automating calculations. Additionally, the Excel form will eliminate the need for grantees to aggregate data across project sponsors, as project sponsors will now complete their own reporting form and the reporting aggregation for each grant will be done automatically in the HOPWA database, eliminating the need for grantee manual aggregation. Finally, the Excel version will make data input in the HOPWA Access database easier, thereby reducing HUD’s burden hours for processing the data. The Word version of the form will use the exact same data elements as the Excel form, but will be 508 compliant for accessibility. The Word version of the new form will not contain the automation of the Excel version.

OHH is seeking approval for this information collection in the form of a data table instead of as a specific form, in order to allow for the possibility of collecting these elements from new or existing computer systems, if possible and as the option becomes available. For example, OHH is exploring the possibility of pulling expenditure data out of the grant financial disbursement system used by grantees to eliminate the need for grantees to report expenditure data in the APR/CAPER. If this proves possible, this will further alleviate grantee reporting burden.

It is projected that these proposed revisions represent a 1,868 hour reduction for HOPWA grantees from the previous HUD-40110-C and HUD-40110-D.

BURDEN:

	Responses	Hours
Previous	284	30,228
New	284	28,360
Adjustment	+ 0	- 1,868

OHH requests that the data elements in this submission not immediately replace current forms HUD-40110-C and HUD-40110-D, but that the new data elements be phased in as HOPWA grantees complete their active reporting year using the previously approved forms HUD-40110-C and HUD-40110-D. If the new data elements immediately replaced the previous forms upon the approval of this revision request, this would result in a substantial change in grantee reporting requirements in the middle of their reporting years and would not provide grantees with adequate opportunity to plan for the new requirements. To ease the transition and avoid confusion, OHH therefore requests that grantees be allowed to complete their current reporting year using the previous forms, and switch to the new data elements at the beginning of their new reporting year. This does not represent a duplication in reporting requirements.

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 HUD websites quarterly.

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.