

**Supporting Statement for Paperwork Reduction Act Submission – Housing Opportunities
for Persons With AIDS (HOPWA) Program
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 No. 2506-0133 and expires on 12/31/2024. HUD is requesting a revision of the currently approved collection. This revision would add a few additional data elements to form HUD-4155, remove forms that are no longer needed, remove components that will be covered with a child submission through the HUD generic information collection request under OMB Control No. 2501-0044, adjust language in form HUD-4154, update form HUD-4153 to reflect published Notices of Funding Opportunity (NOFOs), and add grant closeout to the paperwork collection package with a new HOPWA grant closeout form. The Office of HIV/AIDS Housing (OHH) continues to ask for approval for the data elements in the HUD-4155 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 becomes available. These actions will further alleviate grantee reporting burden.

The currently approved HUD-4155 paperwork collection is for HOPWA annual reporting requirements. In addition to the recordkeeping 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 of the actions the grantee has taken to affirmatively further fair housing, pursuant to 24 CFR 5.151 and 5.152.

(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 currently approved HIV Housing Care Continuum Model Report (HUD-4154) and Housing as an Intervention to Fight AIDS Model Report (HUD-4153) paperwork collection is for HOPWA reporting forms applicable to new competitive grants only. The reporting requirements for these forms are set through the applicable NOFO.

OHH is requesting to remove HUD-40110-C and HUD-40110-D from the package. The two forms, HUD-40110-C and HUD-40110-D, have been replaced by the data elements reflected in HUD-4155, which was phased in during the last two reporting periods. Grantees will no longer be expected to use the HUD-40110-C and HUD-40110-D forms.

OHH is requesting the removal of pre-award information collections for HOPWA Permanent Supportive Housing (PSH) renewal/replacement applications (including narratives and other requirements listed in the PSH Notice); HOPWA Competitive Application (including narratives and other requirements listed in the NOFO). HUD pre-award information collection is now covered under OMB Control No. 2501-0044.

OHH is requesting the addition of information collection for grant closeout for this package. An important step of the grants management is to process grant closeouts. Grant closeout requires HUD to determine that the grantee has completed all applicable administrative actions and all required work of the grant. The information collected for HOPWA grant closeout includes the HOPWA grant closeout certification, the SF425, and all other relevant reports to the grant project including Integrated Disbursement and Information System (IDIS) financial information and an inventory of all real property and personal property acquired or improved under the grant. The closeout process is guided and governed primarily by 2 CFR 200.344, which lays out specific steps and obligations for both HUD and the grantee. The corresponding regulations requiring grant closeout are listed below:

- 24 CFR 574.605. Applicability of uniform administrative requirements, cost principles, and audit requirements for Federal awards. The provisions of [2 CFR part 200](#), “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards”, apply to HOPWA grants.
- 2 CFR 200.344. Closeout.
- 2 CFR 200.311. Real property.
- 2 CFR 200.313. Equipment.
- 2 CFR 200.315. Intangible property.
- 2 CFR 200.344. Closeout.

The other information collections currently approved under this OMB control number will remain unchanged. Those information collections are Recordkeeping for Competitive, Renewal, and Formula Grantees; and Grant Amendments.

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 (PRA) 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, removal of pre-award information collection now covered through HUD generic information collection under OMB Control No. 2501-0044, and the addition of grant closeout to the paperwork collection package with a new HOPWA grant closeout form.

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 only on the activities undertaken, thus there may be components of these reporting requirements that may not be applicable to every grantee.

This submission seeks to add a few additional data elements to the annual reporting requirements for both HOPWA formula and competitive grantees, and seeks to remove the HUD-40110-C and HUD-40110-D forms from the PRA package. In a previous PRA submission, the data elements in these two forms were consolidated into a single set of data elements that are currently reflected in the HUD-4155. Therefore the prior HUD-40110-C and HUD-40110-D forms are no longer needed. The addition of the 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.

Specifically for HOPWA competitive grants, this submission seeks to adjust language in form HUD-4154 to better align and streamline data collection terminology across all HOPWA reporting forms. The information collected will not change; rather, the updates provide additional clarity where grantees have asked questions about the form. Form HUD-4154 was approved prior to the data elements for form HUD-4155 and this submission seeks to better align the data elements and terminology to ensure minimum burden on grantees. This submission also seeks to update form HUD-4153 to better reflect the published NOFOs that require this reporting form. Form HUD-4153 was approved prior to the publication of the FY2020 and FY2023 HOPWA NOFOs. Updates to form HUD-4153 include a name change from Housing Interventions to Fight AIDS (HIFA) Model to Special Projects of National Significance (SPNS) Grant Model to allow a broader application to HOPWA NOFOs and better alignment with the content in the published NOFOs. Form HUD-4153 is only used for one-time reporting at the end of a new competitive SPNS grant's period of performance.

HUD systematically reviews and conducts data analysis in order to prepare national and individual grantee performance profiles that are used to measure program performance against benchmark goals and objectives and to communicate the program's achievement and contributions toward Departmental strategic goals. HUD plans to continue using the data elements in this submission for these purposes.

The addition of information collection for grant closeout will apply to all HOPWA grantees. These additional forms will allow HUD to determine that all applicable administrative actions and all required work of the grant have been completed by the grantee before closing the grant. The SF425 will be used to provide financial information at closeout, and in limited circumstances when program income is earned after a grant's period of performance ends and the last HUD-4155 for the grant has already been submitted. The closeout certification will certify the grantee has completed all administrative actions to close out the grant. HUD Field Offices will initiate the HOPWA grant closeout process once (a) the grantee requests the initiation of the closeout process; or (b) the grant's period of performance has ended and the applicable deadline for submitting final reports has passed.

- 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.**

Completed HUD-4155s are submitted by grantees via email to HUD, and automatically uploaded into the HOPWA database. Completed reporting forms for HOPWA competitive grants only, HUD-4154 and HUD-4153, are submitted by grantees via email to HUD, and data collection is managed by the HUD program office through Excel Workbook.

OHH continues to ask for approval for this information collection in the form of a data table instead of as a specific form for the HUD-4155, 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.

OHH is adding grant closeout to this information collection package for all HOPWA grantees. Within 120 calendar days after the end date of the period of performance, the grantee must submit via email to the respective HUD Field Office all financial, performance, and other reports required as a condition of the grant. Financial reports can be generated through IDIS where grantees access grant funds. SF425 is used to provide financial information at closeout.

- 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.**

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

- 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 this information collection. 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 reporting requirements are identified in the NOFO for new competitive SPNS grants and applicants will have an appropriate amount of time to prepare for the additional reporting. HUD also intends to support awarded grantees with reporting requirements and grant implementation through technical assistance. The changes to the data elements currently reflected in the HUD-4155 and updates to forms HUD-4154 and HUD-4153 are not expected to affect reporting burden hours.

- 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. HUD-4155 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 in the performance reports is 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 to inform public awareness and support of their program. Annual reporting by grantees is a HOPWA statutory and regulatory requirement.

Grant closeout is a regulatory requirement for all federal grants. The addition of grant closeout information collection and a closeout certification will ensure completed grants have met all administrative requirements and can be closed out. Grant closeout only occurs at the end of the grant period of performance.

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 with 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 May 21, 2024 (89 FR 44698). The public has been given until July 22, 2024, to submit comments on the proposed information. As such, the agency has not yet received comments for this information collection request.

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.

HOPWA new competitive SPNS grant applicants are notified in the NOFO 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 NOFO or renewal/replacement notice. The applications for awarded grants will serve as the grant project plan and be incorporated into the grant agreement. Applications that are not selected for grant awards will be filed for the required three-year recordkeeping period, and then destroyed. The unawarded applications will only be available to the public through an approved FOIA request.

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.

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 lower for the removal of pre-award information collection now covered through HUD generic information collection under OMB Control No. 2501-0044. The removal of forms HUD-40110-C and HUD-40110-D also lowered the estimated burden hours on the chart, but this reflects a de-duplication of reporting forms on the chart rather than a true reduction in burden hours. HOPWA grantees are only required to submit form HUD-4155, which replaced forms HUD-40110-C and HUD-40110-D through a transitional phase. However, there were additional new competitive SPNS grants added, which raised the estimated burden hours to account for 14 more new competitive grantee respondents.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Consolidated APR/CAPER data elements (HUD-4155)	258.00	1.00	258.00	40.00	10,320.00	\$28.73	\$296,493.60
HUD-4154, HIV Housing Care Continuum Model Report (new competitive SPNS grant only)	40.00	1.00	40.00	20.00	800.00	\$28.73	\$22,984.00
HUD-4153, SPNS Grant Model Report (new competitive SPNS grant only)	40.00	1.00	40.00	40.00	1,600.00	\$28.73	\$45,968.00
Recordkeeping for Competitive, PSH, and Formula Grantees	258.00	1.00	258.00	60.00	15,480.00	\$28.73	\$444,740.40
Grant Amendments (budget change, extension, or early termination)	30.00	1.00	30.00	6.00	180.00	\$28.73	\$5,171.40
Grant Closeout (closeout certification, SF425, and all financial, performance, and other reports required as a condition of the grant)	258.00	1.00	200.00	12.00	2,400.00	\$28.73	\$68,952.00
Total	884.00	-	826.00	-	30,780.00	-	\$884,309.40

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 \$28.73 is based on a GS-9 for Rest of United States. 10,320 hours * \$28.73 = \$296,493.60.

The estimated cost under this OMB approval number in this request is lower than previous approval. This accounts for the removal of forms HUD-40110-C/D, and removal of pre-award information. Updates on the chart also include the addition of grant closeout, increases for a larger number of new competitive SPNS grants, and higher hourly wage.

13. Estimate of the average, annual cost beyond the cost of hour burden shown in Item 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 consolidated APR/CAPER data elements (HUD-4155)	258	1	258	11	2,838	\$47.53	\$134,890.14
HUD-4154, HIV Housing Care Continuum Model Report (new competitive SPNS grant only)	40	1	40	10	400	\$47.53	\$19,012.00
HUD-4153, SPNS Grant Model Report (new competitive SPNS grant only)	40	1	40	20	800	\$47.53	\$38,024.00
Compiling and publicly publishing grantee performance and accomplishment summaries	258	1	258	4	1,032	\$47.53	\$49,050.96
Execution of Grant Amendments (budget change, extension, or early termination)	30	1	30	6	180	\$47.53	\$8,555.40
Grant Closeout	258	1	200	12	2,400	\$47.53	\$114,072.00
Total	884			-	7,650	-	\$363,604.50

All annualized costs reflect staff time spent on tasks in the table. The hourly rate is based on a GS-12 in Washington, DC. 7,650 hours * \$47.53 = \$363,604.50.

The estimated cost under this OMB approval number in this request is lower than previous approval. This accounts for the removal of forms HUD-40110-C/D, and removal of pre-award information. Updates on the chart also include the addition of grant closeout, increases for a larger number of new competitive SPNS grants, and higher hourly wage.

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 minor revision of the data elements reflected in HUD-4155 to add some data elements and remove others. Also, this submission requests removal of forms HUD-40110-C and HUD-40110-D from the information collection. In a previous PRA submission, the data elements in these forms were consolidated into a single set of data elements, which are now reflected in the HUD-4155. Therefore these forms are no longer needed. Due to the removal of forms HUD-40110-C and HUD-40110-D, the burden hours for reporting appear to be lower because those forms were carrying burden hours through the transition to form HUD-4155.

OHH continues to ask for approval for the HUD-4155 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. 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 their annual reports. If this proves possible, this will further alleviate grantee reporting burden.

This collection also removed pre-award information collection and added grant closeout information collection.

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 HUD-4155 are posted on HUD websites quarterly. Information provided through form HUD-4153 will be shared with the public, and lessons learned through grantee efforts will help inform national and community policy and actions.

17. Explain any request to not display the expiration date.

The Department is not seeking approval to not display the OMB approval expiration date for the information collected.

18. Explain each exception to the certification statement identified in item 83i-19.

The Department is not seeking an exception to the certification statement.

B. Collections of Information Employing Statistical Methods

The HOPWA program does not use statistical methods.