

Supporting Statement for Paperwork Reduction Act Submissions
(Data Collection and Reporting for Hud's Homeless Assistance Programs – Annual Performance
Report and System Performance Report)
(OMB# 2506-0145)

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.

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 Continuum of Care (CoC).

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 is 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 persons experiencing homelessness 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 persons experiencing homelessness 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 persons experiencing homelessness 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 experiencing homelessness.

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

Annual Performance Report (APR) for Homeless Assistance Projects

The APR (OMB Approval No. 2506-0145; Expiration: January 31, 2025) 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. The reporting requirements are the same for the CoC program, YHDP and HUD's Special NOFO Award, 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 homelessness are 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). For grants awarded under the Special CoC Program NOFO for Rural & Unsheltered Homelessness, HUD requires more frequent reporting to ensure that these high-priority grants are on track towards making progress. There are 277 grants that were awarded for this NOFO. Of these, 224 grants report quarterly, because they provide direct services and housing supports, and 53 report annually because they are more focused on supporting the administration of other funds.

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. 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 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 Annual Homeless Assessment Reports (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 selection criteria for 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)

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

APR for HUD's Homeless Assistance Programs

The APR will be used by recipients of YHDP funding, funding under the Special NOFO, projects funded under the CoC Builds NOFO, 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 modified 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).

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 Persons Experiencing Homelessness

Measure 4: Employment and Income Growth for Persons Experiencing Homelessness 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

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.

APR for HUD's CoC

As described in Section A.2.1 above, HUD uses 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 Line of Credit Control System (LOCCS) Portions of the APR will be pre-filled with information from these sources.
2. ***Comma Separated Value (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.

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

As described in Section A.2.2 above, CoCs submit their system-level performance data electronically, through HUD's HDX website. Currently, CoCs use the HDX to submit the Longitudinal System Analysis (LSA), PIT count, and HIC data to HUD. The addition of system-level performance measures required the development of a new module on the HDX website, but the user interface and log-in process are the same for CoCs as what they currently utilize to submit their PIT and HIC data to HUD. To increase the accuracy of the data and reduce burden on CoCs, the HDX has 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

4. Describe 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 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. The LSA data is focused on household-level performance measures, while the system performance measures calculate person-level progress towards the system performance selection criteria outlined by section 427(b)(1)(A) of the McKinney-Vento Homeless Assistance Act, as amended, and will allow HUD to compare this data among various CoCs and improvements between reporting periods.

5. If the collection of information impacts small businesses or other small entities 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.

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.

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.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
 - 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**

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

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.
 - Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported.
 - Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.

In accordance with 5 CFR 1320.8(d), the agency's notice announcing this collection of information appeared in the Federal Register on October 15, 2024, (Volume 89, No 83035). The public was given until December 16, 2024, to submit comments on the proposed information collection. 0 Comment(s) were received.

APR for HUD's CoC Program: Field Office Consultation

The HUD Headquarters team field office meets throughout the year to discuss potential revisions to the APR.

9. Explain any decision to provide any payment or gift 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

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

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

HUD does collect contact information from the persons who submit the reports (e.g. name, phone number, e-mail, work address), but it does not publish this information outside of systems. The contact information is only accessible within the password-protected Sage system and used to contact the person with further questions about the reports.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

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

12. Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices;
- If this request covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in chart below; and
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.

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 over a one-year period, including quarterly reporting for 220 unsheltered grant recipients, is estimated at 47,474 hours, which is a decrease from the estimated burden of 50,530 for completing the APR under the last clearance (OMB Approval No. 2506-0145).

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 42,244 hours. The CoC Program APRs are collected annually. Two special programs submit quarterly reports:

YHDP, which submits four quarterly reports and an annual report.

Special CoC NOFO projects three quarterly reports and one annual report (which also covers that quarter). Some (53 of 277) Special CoC NOFO projects only submit an annual report, based on their project types.

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 4.2 hours at a cost of \$201.67.

As of July 2025, the CoC Builds NOFO is soliciting applications. HUD anticipates making 25 awards under this NOFO. This funding opportunity is for the acquisition, construction, and rehabilitation of properties that will permanently house people experiencing homelessness. It is expected that each of these awards will turn into a Permanent Supportive Housing (PSH) project. As part of the receipt of funds, recipients will file annual performance reports on their financial expenditures and any information on clients served. The reporting requirements will be tied to restrictive covenants and will last 15 years after the projects begin serving clients.

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 43,000 hours for 8,000 homeless assistance providers.

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	3,550.00	1	3,550.00	4	14,200.00	\$48.03	682,026.00
Quarterly Performance Report (YHDP) - Non-profit Recipients	200.00	4	800.00	5	4,000.00	\$48.03	192,120.00
Annual Performance Report (YHDP) - Non-profit Recipients	200.00	1	200.00	5	1,000.00	\$48.03	48,030.00
Performance Report (Special CoC NOFO Grants that report quarterly) - Non-profit Recipients	110.00	4	440.00	4	1,760.00	\$48.03	84,532.80
Performance Report (Special CoC NOFO Grants that report	28.00	1	28.00	4	112.00	\$48.03	5,379.36

annually) - Non-profit Recipients							
Annual Performance Report (CoC Builds NOFO) - Non-profit Recipients	13.00	1	13.00	4	52.00	\$48.03	2,497.56
Annual Performance Report (CoC Program) - State and Local Recipients	3,550.00	1	3,550.00	4	14,200.00	\$48.03	682,026.00
Quarterly Performance Report (YHDP) - State and Local Recipients	200.00	4	800.00	5	4,000.00	\$48.03	192,120.00
Annual Performance Report (YHDP) - State and Local Recipients	200.00	1	200.00	5	1,000.00	\$48.03	48,030.00
Performance Report (Special CoC NOFO Grants that report quarterly) - State and Local Recipients	110.00	4	440.00	4	1,760.00	\$48.03	84,532.80
Performance Report (Special CoC NOFO Grants that report annually) - State and Local Recipients	28.00	1	28.00	4	112.00	\$48.03	5,379.36
Annual Performance Report (CoC Builds NOFO) - State and Local Recipients	12.00	1	12.00	4	48.00	\$48.03	2,305.44
Total	8,201.00		10,061.00		42,244.00		2,028,979.32

*Hourly wage rates are based on the 2024 Occupational Employment and Wages published by the Department of Labor (8/21/2024). The median hourly wage rates in Exhibit A-2 represent the average of “Business Operations Specialists, All Other” (\$44.41/hr) and “Database Administrators” (\$51.65), assuming an equal proportion of hours required to complete the Performance Report per occupational type.

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 \$624.39 (13 burden hours per response multiplied by \$48.03, which is the hourly cost per response). The estimated annualized cost for other CoCs (Group 2) is \$720.45 (15 burden hours per response multiplied by \$48.03, 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	5,005.00	\$48.03	\$240,390.00
Group 2: CoCs with Manual Software Report	15.00	1	15.00	15	225.00	\$48.03	\$10,807.00
Total	400.00		400.00		5,230.00		\$251,197.00

*Hourly wage rates are based on the 2024 Occupational Employment and Wages published by the Department of Labor (8/21/2024). The median hourly wage rates in Exhibit A-2 represent the average of “Business Operations Specialists, All Other” (\$44.41/hr) and “Database Administrators” (\$51.65), assuming an equal proportion of hours required to complete the Performance Report per occupational type.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet shown in Items 12 and 14).

The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;

If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

Generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

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.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

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 measures. The total estimated annualized cost to the federal government for the reports over a one-year period, including quarterly reporting for YHDP and Special CoC NOFO grants, is estimated at 9,847 hours for \$323,730.22.

Federal Government Cost Estimates for APR for HUD's Homeless Assistance Programs

HUD reviews every single performance report. HUD's local field office staff review the CoC Program APRs and the Special CoC NOFO QPRs and APRs. HUD's headquarters staff reviews the YHDP 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, Special CoC NOFO grant funding and CoC Builds, is 1 hour per report at a cost of \$32.88 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)	7,100.00	1	7,100.00	1	7,100.00	\$30.26	\$214,846.00
Annual Performance Report (YHDP)	400.00	1	400.00	1	400.00	\$43.14	\$17,256.00
Quarterly Performance Report (YHDP)	400.00	4	1,600.00	1	1,600.00	\$43.14	\$69,024.00
Annual Performance Report (Special CoC NOFA Grants)	56.00	1	56.00	1	56.00	\$30.26	\$1,694.56
Quarterly Performance Report (Special CoC NOFA Grants)	222.00	3	666.00	1	666.00	\$30.26	\$20,153.16
CoC Builds	25.00	1	25.00	1	25.00	\$30.26	\$756.50
Total	8,203.00		9,847.00		9,847.00		\$323,730.22

*Hourly wage rates are based on federal employees paid under the 2025 General Schedule (GS). Reports reviewed by HUD Field Office employees are assumed to be at GS-11, step 1 (\$30.26/hr). Reports reviewed by HUD headquarters employees are assumed to be at GS-13, step 1 (\$43.14/hr).

Additionally, HUD has a contract with a 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.

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 \$42.41 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	1.00	400.00	\$43.14	\$17,256.00

*Hourly wage rates are based on federal employees paid under the 2024 General Schedule (GS). Reports reviewed by HUD headquarters employees are assumed to be at GS-13, step 1 (\$42.41/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

15. Explain the reasons for any program changes or adjustments reported in Items 12 and 14 of the Supporting Statement.

The reporting burden in the most recent PRA package was 50,530 hours. The total burden hours has been reduced to 47,474 hours. Although since the most recent PRA package, the number of our funding opportunities and reports has increased, this has been more than offset by the decrease in the number of CoC Program awards (from 8,000 a few years ago to 7,067 in the FY 2023 CoC Competition), which has been driven by the consolidation of (as opposed to a loss of funding). Another reason for the reduction in burden hours is technological and user-friendly improvements in the Sage and HDX systems. 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. HUD also removed the Performance Data

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

Checkup part of the PRA package. HUD did not implement this in the past and no longer plans on implementing it. These updates to the way data are submitted to HUD resulted in a decrease of 3,056 hours. Note also, that HUD changed its data collection process for the AHAR and now refers to the data collection process for the AHAR as the Longitudinal System Analysis (LSA) data collection process.

16. For collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

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 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

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

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

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

There are no exceptions to the certification.