Supporting Statement for Paperwork Reduction Act Submissions
Standards for Success Reporting
(OMB Control No. 2501-0034)

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 request is for the renewed clearance of data collection and reporting requirements for Standards for Success Reporting at the U.S. Department of Housing and Urban Development (HUD). The adoption of Standards for Success Reporting for discretionary-funded programs enables HUD to better assess the effectiveness and performance of the discretionary programs annually. A key component of Standards for Success Reporting is ensuring HUD's discretionary awards are clearly focused on outcomes and efforts to continually improve these outcomes, while allowing comparability of data through the standardization of data element definitions and data collection requirements. The proposed reporting requirements align with program goals and objectives identified in the Notices of Funding Opportunity published for HUD's discretionary programs. The discretionary-funded programs included are the Multifamily Housing Service Coordinator Grant Program, the Multifamily Housing Budget-Based Service Coordinator Program, and the Resident Opportunity and Self Sufficiency Service Coordinator Grant Program (ROSS).

Prior to Standards for Success, HUD's attempt to systematically collect performance information on discretionary programs used a proprietary product called the Logic Model / eLogic Model. The Logic Model / eLogic Model was intended to collect information on a wide variety of outcomes and included separate performance reports based on unique data definitions and outcome measures. Each discretionary program selected the outcomes and outputs on which funding-recipients would report without regard for the outcomes being tracked by programs funding similar activities. For example, in Fiscal Year (FY) 2013, 9 programs used varying numbers of the 734 unique performance measures to assess the performance of their respective discretionary awards. In FY2015 only two programs continued the use of the eLogic Model.

All programs, except the programs currently using Standards for Success, specify unique reporting requirements with which funding-recipients must comply. Many HUD programs require annual progress or performance reports based on each award's period of performance. The lack of standardized data elements and reporting significantly limits HUD's ability to effectively analyze funding-recipient data for reporting on the progress of programs to senior HUD officials, the Administration, Congress, and taxpayers. Additionally, the lack of standardized data collection and report preparation procedures increases the burden on funding-recipients with multiple awards from HUD.

The need for a comprehensive and standardized reporting approach is underscored by reviews conducted by external oversight agencies, including the HUD Office of the Inspector General (OIG) and the Government Accountability Office (GAO). In response, HUD is using its statutory and regulatory authority to improve and strengthen performance reporting for its discretionary programs, ultimately working towards a single comprehensive approach.

The Secretary's statutory and regulatory authority to administer housing and urban development programs include provisions allowing for the requirement of performance reporting from funding-recipients. This legal authority is codified at 42 USC 3535(r):

> *"Program evaluation and monitoring*
> *(1) For the programs listed in paragraph (2), amounts appropriated under this subsection shall be available to the Secretary for evaluating and monitoring of all such programs (including all aspects of the public housing and section 202 programs) and collecting and maintaining data for such purposes. The Secretary shall expend amounts made available under this subsection in accordance with the need and complexity of evaluating and monitoring each such program and collecting and maintaining data for such purposes.*
> *(2) The programs subject to this subsection shall be the programs authorized under—*
> *(A) titles I [42 U.S.C. 1437 et seq.] and II 1 of the United States Housing Act of 1937;*
> *(B) section 202 of the Housing Act of 1959 [12 U.S.C. 1701q];*
> *(C) section 106 of the Housing and Urban Development Act of 1968 [12 U.S.C. 1701x];*
> *(D) the Fair Housing Act [42 U.S.C. 3601 et seq.];*
> *(E) title I [42 U.S.C. 5301 et seq.] and section 810 1 of the Housing and Community Development Act of 1974;*
> *(F) section 201 of the Housing and Community Development Amendments of 1978 [12 U.S.C. 1715z–1a];*
> *(G) the Congregate Housing Services Act of 1978 [42 U.S.C. 8001 et seq.];*
> *(H) section 222 of the Housing and Urban-Rural Recovery Act of 1983;*
> *(I) section 3616a of this title;*
> *(J) title IV of the McKinney-Vento Homeless Assistance Act [42 U.S.C. 11360 et seq.]; and*
> *(K) titles II [42 U.S.C. 12721 et seq.], III, and IV and section 811 [42 U.S.C. 8013] of the Cranston-Gonzalez National Affordable Housing Act.*
> *(3) In conducting evaluations and monitoring pursuant to the authority under this subsection, and collecting and maintaining data pursuant to the authority under this subsection, the Secretary shall determine any need for additional staff and funding relating to evaluating and monitoring the programs under paragraph (2) and collecting and maintaining data for such purposes.*
> *(4)(A) The Secretary may provide for evaluation and monitoring under this subsection and collecting and maintaining data for such purposes directly or by grants, contracts, or interagency agreements. Not more than 50 percent of the amounts made available under paragraph (1) may be used for grants, contracts, or interagency agreements.*
> *(B) Any amounts not used for grants, contracts, or interagency agreements under subparagraph (A) shall be used in a manner that increases and strengthens the ability of the Department to monitor and evaluate the programs under paragraph (2) and to collect and maintain data for such purposes through officers and employees of the Department.*
> *(5) There are authorized to be appropriated to carry out this subsection such sums as may be necessary for fiscal year 1993 and fiscal year 1994. Such amounts shall remain available until expended."*

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.

   Applicable entities receiving discretionary funds from HUD implement these recordkeeping and reporting requirements with available HUD funds. The proposed reporting requirements better organizes data already collected and helps standardize the measurement of performance. The HUD Participant Record-Level Report (HUD-PRL) contains the data elements collected and the purpose for collecting each item.

   Information collected and reported is used by funding-recipients and HUD for the following purposes:

   - To provide program and performance information and data to stakeholders including taxpayers, Congress, advocacy groups, and others;
   - To continuously improve the quality, effectiveness, and efficiency of programs;
   - To provide management information for program administration and oversight, including the scoring of applications and the monitoring of funding-recipient participation, services, and outcomes;
   - To ensure funding-recipients receive sufficient and timely technical assistance and support; and
   - To better measure and analyze performance information to identify successful practices to be replicated and prevent or correct problematic practices and improve outcomes in compliance with the Government Performance and Results Act (GPRA) and the GPRA Modernization Act (GPRAMA).

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.

   Standards for Success Reporting streamlines HUD’s collection of data and funding-recipient preparation of reports by providing an online reporting portal through the GrantSolutions online data collection and reporting tool (OLDC). GrantSolutions OLDC allows users direct data input, Microsoft Excel or extensible markup language (XML) file uploads, and system-to-system connectivity with previously linked case management systems. For those funding recipients that choose to use the latter option of another case management system, HUD and GrantSolutions provide guidance and technical assistance to enable successful file upload and report submission.

   GrantSolutions OLDC is part of a suite of online modules through the Grants Center of Excellence at the U.S. Department of Health and Human Services. GrantSolutions OLDC enables funding-recipients to input and save data throughout the reporting period. Upon conclusion of a given reporting period, funding-recipients can then submit their data seamlessly using the tool. To reduce burden, once reports are submitted, funding-recipients can carry over their data from year-to-year; thus, eliminating duplicative work and allowing funding-recipients to only have to record changes and additions from the previous year. To improve quality of data, guidance and validation rules are built-in to the interface as users input and ultimately submit data. Throughout the reporting cycle, HUD and GrantSolutions guide and assist funding-recipients in understanding Standards for Success reporting requirements, data elements, and how to use GrantSolutions OLDC.

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.

   HUD-PRL is the only report that requires data on individual participants for discretionary programs. The GrantSolutions OLDC functionality enables funding-recipients to collect data once per reporting period and submit required data for the HUD-PRL report directly through GrantSolutions OLDC or from their management information systems.

5. If the collection of information impacts small businesses or other small entities describe any methods used to minimize burden.

   No small businesses or entities are impacted. No small businesses are involved as respondents to this data collection effort.

6. Describe the consequences 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.

   Both HUD and funding-recipients are mandated by various program-specific legislative acts, as well as GPRA and GPRAMA, to establish performance standards and make available reports concerning program operations and expenditures. The inability to utilize program performance data in order to develop strategies for continuous improvement could negatively affect program performance, future Congressional appropriations, and individuals who benefit from services provided through these programs.

   HUD’s ability to oversee and ensure the efficient and effective use of federal funds by funding-recipients would be greatly impaired if this collection were not approved and conducted as proposed. If this proposed collection were not approved, then HUD would not be able to:

   - Distinguish discretionary funding-recipient program success from failure without the proposed approach to measuring the results of individual awards, activities, and the program overall;
   - Incentivize or reward success as it would not be in a position to determine success;
   - Avoid the risk of rewarding failure;
   - Learn from its success if it cannot distinguish success from failure;
   - Recognize failure in order to correct it; and
   - Justify continued funding if HUD cannot demonstrate results.

Additionally, 42 USC 3535(r)(1) charges HUD with "…*evaluating and monitoring of all such programs (including all aspects of the public housing and section 202 programs) and collecting and maintaining data for such purposes.*" If this proposed collection request were not approved, HUD would not be able to fulfill its oversight role.

The frequency of funding-recipient reporting under this collection request is once annually for the HUD-PRL. Currently, the frequency of reporting is mixed among the discretionary programs, making it difficult to get a timely and complete picture on award activities. Without Standards for Success, there is no standardized approach to the frequency of reporting. In FY2015, 57 percent of the discretionary programs required annual reporting, 36 percent required quarterly reporting, and 7 percent of the programs required real-time reporting. In determining the frequency of reporting, HUD considered factors such as the size of the award, the duration of the project, the complexity of the funding-recipient's operation, and the availability of resources in producing such reports without interrupting normal operation.

If annual reporting were eliminated for the HUD-PRL and completed only during the award closeout process, then HUD would be severely constrained in conducting performance-based evaluations, providing appropriate technical assistance, and performing risk assessments on discretionary awards. There is a tremendous need for reporting at least annually to assess and track the progress of awards in achieving stated performance goals.

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: 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

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.

   The participating HUD programs communicate and receive feedback from their funding recipients throughout the reporting cycle. Those programs continuously provide technical assistance and guidance documents from feedback received to support funding recipients' data reporting efforts.

   In accordance with 5 CFR 1320.8(d), the agency's notice announcing this collection of information appeared in the Federal Register on 10-02-2025, (Volume 90, No. 189, page 47806). The public was given until 12-02-2025, to submit comments on the proposed information. No comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than renumeration of contractors or grantees.

   HUD does not provide remuneration to funding-recipients.

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.

    Assurance of confidentiality is neither provided nor needed for this information collection. HUD maintains the data in accordance with all applicable Federal laws. Record-based data submitted by funding-recipients and maintained by HUD does not contain any personally identifiable information (PII) specified by the National Institute of Standards and Technology (NIST) as clearly distinguishing individual identity (e.g., names, Social Security Numbers, birth dates, physical addresses, et cetera). Each funding recipient submits records to HUD each year, but it submits these records using unique individual identifiers developed and known only by the funding recipient. The unique identifiers do not contain any PII.

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.

    This collection request does not include questions of a sensitive nature for funding recipients, subrecipients, and participating individuals. However, potentially private or sensitive demographic information reported under this request is already required by authorizing legislation to be collected and documented for eligibility determination purposes in order for individuals to receive HUD-funded services and products.

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.

Information Collection	**Number of Respondents**	**Frequency of Response**	**Responses Per Annum**	**Burden Hour Per Response**	**Annual Burden Hours**	**Hourly Cost Per Response**	**Annual Cost**
HUD Participant Record-Level Report (HUD-PRL)	5,723	1	5,723[1]	34.32[2]	196,413	$21.00[3]	$4,124,681

[1] There are an estimated 104 individuals served by each of the 5,723 funding recipients.
[2] There are 20 minutes approximated for each of the estimated 104 individuals within each response.
[3] The hourly cost of $21.00 is the average wage for data entry and information processing workers as reported in the May 2024 Occupational Employment and Wages produced by the U.S. Department of Labor, Bureau of Labor Statistics.

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.

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.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
HUD Participant Record-Level Report (HUD-PRL)	5,723	1	5,723	0.25	1,431	$57.78[1]	$82,668.74

[1] The hourly cost of $57.78 is the wage for a GS-13 Step 1 management and program analyst in 2025 per the Office of Personnel Management.

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

    This is a renewal of a currently approved collection. No changes from previous approval.

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.

    There are no plans to publish information at this time.

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 is displayed on all data collection instruments. No exceptions are requested.

18. Explain each exception to the certification statement.

    No exceptions are requested in the “Certification of Paperwork Reduction Act Submissions.”