

SUPPORTING STATEMENT FOR
PAPER WORK REDUCTION ACT SUBMISSION
HEALTHY HOMES and LEAD HAZARD CONTROL GRANT PROGRAMS
DATA COLLECTION - PROGRESS REPORTING
(OMB No. 2539-0008)

A. JUSTIFICATION

1. Circumstances making information collection necessary.

This is a request for a revision of OMB's existing approval of reporting and data collection instruments for the grant programs of the Office of Lead Hazard Control and Healthy Homes (OMB Approval No. 2539-0008).

Section 1011 of the Housing and Community Development Act of 1992 (P.L.102-550) authorizes a grant program for State and local governments for the evaluation and reduction of lead-based paint hazards in privately owned housing built before 1978 and occupied by families with low incomes, with a focus on protecting children under the age of 6. This program is a continuation of a similar program that was mandated by the HUD Appropriations Act for FY 1992.

The authority for the Healthy Homes Initiative (HHI) is sections 501 and 502 of the Housing and Urban Development Act of 1970 and the Consolidated Appropriations Act, 2006 (Transportation, Treasury, Housing and Urban Development, the Judiciary, the District of Columbia, and Independent Agencies Appropriations Act, 2006 Public Law 109-115, 119 Stat. 2396, approved: November 30, 2006.)

This data collection is designed to provide timely information to HUD regarding the implementation progress of the grantees on carrying out the Healthy Homes Technical Studies Program, Lead Hazard Control Program, Lead Hazard Reduction Demonstration Program, Lead Technical Studies Program, and to provide Congress with status reports as required by statute - Title X of the Housing and Community Development Act of 1992 (P.L. 102-550).

OLHCHH previously issued grants (and cooperative agreements) for Healthy Homes Demonstration, Lead Outreach and Operation Lead Elimination Action programs; at present and due to funding made available, there are no plans to issue grants for these programs. However, if additional funding materializes, more grants will be issued.

2. Uses of the data.

The Department will use this information to report to Congress on the progress of lead hazard reduction work and to determine the relative cost and effectiveness of various kinds of treatments to protect health. The Office estimates that 200 OLHCHH grantees will be reporting four times per year. Data collected electronically on-line from the Lead Technical Studies and Healthy Homes Technical Studies cooperative agreements are used to support HUD's Strategic Goal of addressing housing conditions that threaten health. In particular, these data capture the number of units where allergen levels have been reduced with corresponding health outcomes such as reduction in asthmatic episodes of children, and the number of housing units made lead-safe.

3. Data automation.

The Healthy Homes Grant Management System (HHGMS) is designed to assist grant management and coordination between HUD OLHCHH staff and key staff from grantee organizations. It is a cloud-based customer relationship management (CRM) application built on the Salesforce platform. Key activities tracked and coordinated through this system include grant application review, grant negotiations, quarterly reporting, grant amendment requests, and grant closeouts. This system is used to coordinate with grantees through an external portal and with HUD OLHCHH staff through an internal portal.

For the Lead Hazard Control Program, the largest program in OLHCHH, grantees are required to report quarterly on their progress toward completion of their goals and objectives. For example, they report on the number of recruited homes, the number of lead-based paint inspections and risk assessments performed, and the number of units/homes where lead hazard control work was completed. All of this information is reported into the Healthy Home Grants Management System (HHGMS). Similar requirements apply to the Lead Hazard Reduction Demonstration Program.

By collecting data from 100% of our OLHCHH grantees, the Office will be able to collect and report all grant performance for the annual performance strategic goals more accurately. The vast majority of the data at grantee sites is collected in the field by the grantee and then entered on-line into the electronic versions of the on-line data collection forms of the Healthy Home Grants Management System (HHGMS).

4. Duplication.

OHHLHC Grantees are providing performance data on their progress toward meeting their established grant benchmarks and/or milestones. This information collection effort does not duplicate any other effort and will not produce any information duplication.

5. Small businesses.

Small businesses may receive funding from the Healthy Homes Initiative (Healthy Homes Technical Studies or Lead Technical Studies) program. If so, they would be required to report to HUD on a quarterly basis.

6. Federal Policy Notice.

If the proposed information is not collected, we will not be able to determine and make known the progress of the grantees in carrying out their responsibilities of reducing the exposure of young children to lead-based paint hazards. This data will enhance the precision and accuracy of estimates of the effectiveness and relative cost of different strategies for reducing lead in house dust and lead in the blood of young children.

If information is not collected for the HHI, we will not be able to evaluate the performance of grantees in achieving HUD's goal of addressing housing conditions that threaten health. Because Healthy Homes grantees report reductions in allergens (mold and allergens from pests and/or pets) in residences and the corresponding reduction in asthmatic episodes of children living in these units that are constructed or rehabilitated using healthy homes principles, information about baseline levels of asthma triggers (allergens) is collected as pre-mitigation data; the efficacy

of methods for the reduction of these allergens is collected as post-mitigation data.

In addition, Healthy Homes grantees report the number of individuals contacted, the number of units assessed, the number of interventions provided, the number of individuals reached through education/outreach activities and the number of individuals trained in healthy homes principles.

7. Special Circumstances.

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

8. Federal Register Notice.

In accordance with 5 CFR 1320.6 this information collection soliciting public comments was announced in the Federal Register on February 17, 2016, Volume 81, No. 31 , Page 8092. One request for additional information was received, on February 16, via email, whether any changes were being made to the reporting forms or is HUD just reducing the burden estimate based on the number of expected respondents? HUD's response: "The burden estimate was reduced largely due to the reduced number of grantees/respondents. HUD OLHCHH is also now using electronic reporting equivalent to the previous reporting form, which decreases each respondent's response time required."

9. Respondent remuneration.

No payments or gifts are provided to respondents.

10. Confidentially.

This collection does not require the retention of confidential or sensitive material.

11. Sensitive questions.

There are no sensitive questions being asked.

12. Respondent burden.

OLHCHH estimates that the increase in reporting as a result of the Healthy Homes Supplemental Funding made available to Lead Hazard Control grantees is more than balanced by the reduced reporting from the cessation of grants to the Healthy Homes Demonstration, Lead Outreach and Operation Lead Elimination Action programs.

Reporting Burden: HUD 96006 or electronic equivalent reporting.

Annual Number of Respondents	Annual Frequency of Responses	Annual Responses	Annual Hours per Response	Annual Burden hours
200	4 per year	800	10	8,000

All respondents' expenses are covered by grant funds. Since quarterly reporting is a requirement of the grant programs, grant staff prepares the quarterly reports. In most grants, the Program Manager is the staff responsible for reporting into HHGMS. Based on a brief review of active grants and Program Manager salaries, we estimate an average hourly rate of the HHGMS user to be \$32.

13. Cost burden to respondents.

There are no costs to the respondents other than those shown in item 12 above.

14. Annualized cost to the Federal government.

The annualized cost to the Federal government for data collection and management is an estimated maximum of \$70,000. The total estimated annualized capital cost is \$35,000 and the total estimated O&M annual cost is \$20,000. Based on a brief review of active grants and Program Manager salaries, we estimate an average hourly rate of the HHGMS user to be \$32.

15. Program Changes.

This is a revision of a currently approved collection. The reporting has changed to an electronic on-line format for quarterly performance reports for the Healthy Homes Technical Studies and Lead Technical Studies grant programs, and for the Lead-Based Paint Hazard Control Program and Lead Hazard Reduction Demonstration grant programs.

16. Publication of information.

There are no plans at this time to formally publish these results. They will be made available to state and local officials involved in lead-based paint poisoning and prevention

programs and other interested parties.

Healthy Homes and Lead Technical Studies grantees, and other grantees, are urged to publish their results in peer-reviewed technical journals.

17. Display of expiration date.

The expiration date of the data collection will be displayed on the right footer.

18. Exceptions to certification statement.

There are no exceptions.