



August 13, 2020

HUD Desk Officer  
Office of Management and Budget  
New Executive Office Building  
Washington, DC 20503

RE: 30-Day Notice of Proposed Information Collection: HOME Investment Partnerships Program (OMB Control No. 2506-0171)

The Council of State Community Development Agencies (COSCDA) represents state housing and community development agencies which administer the HOME Investment Partnerships program (HOME). COSCDA members appreciate the opportunity to comment on HUD's information collection for the program and recognizes the importance of showcasing impact of federal investments through project data.

HOME administrators dedicate considerable resources and time on program management. For example, Participating Jurisdictions (PJs) must ensure HOME investments meet affordability periods that span many years. Project portfolios expand with each new investment therefore increasing administrative needs to ensure compliance. Though initial investment has ended, administrative burdens increase as more projects need to be overseen. At the same time, available funds for administrative costs do not increase through the HOME program allocation. It is also difficult for PJs to forecast workload and staff due to the variance of available HOME funding each year. Other programs maintain more consistency in available resources and administration can be better prepared for around these funding sources. Administrative staff is later adjusted to accommodate HOME implementation.

The following responses aim to assist HUD and promote information collection around HOME investments.

**(1) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility**

State PJs are committed to upholding the integrity of the HOME program while promoting sustainable affordable housing opportunities. Any addition to the collection of the current list of information could pose burdens and increase costs not only for the PJ but property owners as well. Staff time and capacity needs to be responsive to core grant administration duties including sub-recipient monitoring and program compliance. Although the list of proposed information is extensive, many of these metrics provide valuable details in performance assessment.

## **(2) The accuracy of the agency's estimate of the burden of the proposed collection of information**

COSCD A has no comment or suggestion to improve the estimated burden of the proposed collection of information though recognizes the costs associated with available funds for projects and administration.

A total of \$26,209,395 is the estimated cost in collecting this information. Based on the total amount of HOME funds allocated to grantees in fiscal year (FY) 2020 (\$1,356,419,200), 1.93% of funds will be dedicated to this activity. If grantee match funds are included to the award amount (25% of \$1,356,419,200 = \$339,104,800;  $\$1,356,419,200 + 339,104,800 = \$1,695,524,000$  total) the costs amount to 1.55% of all available direct investment in the HOME program. While percentage is minimal based on annual available funding, a maximum of 10% is available for HOME program administration. The 1.93% or 1.55% reported above increases to 19.3% and 15.5% when considering these costs as a part of administrative costs alone. The amount is therefore substantial once accounting for the cost burden as a part of administration. To preserve most available funds to meet basic administration and to maximize project investments, information collection should be focused on necessary data points to show program impact.

## **(3) Ways to enhance the quality, utility, and clarity of the information to be collected**

COSCD A recommends that HUD continue to provide meaningful guidance on information collection. Training specific to data tracking and collection assists PJs in proper reporting. The availability of training more frequently would be welcomed and COSCD A is available to help coordinate these opportunities with HUD staff.

Additionally, technical assistance on using available systems including IDIS as well as other available tools promotes accuracy in providing information. A more streamlined system would also better accommodate PJs in information collection and input. One positive change to the system, for example, would be to modify how addresses and names of activities and grantees are inputted. This slight update would aid administrators by reducing the amount of time in data entry and retaining information for review thereafter.

## **(4) Ways to minimize the burden of the collection of information on those who are to respond including through the use of appropriate automated collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.**

State PJs welcome tested, useful tools and processes which accommodate collection of the proposed information. Updates to the current system including IDIS would be preferred over the addition of new software as program administrators are experienced in using this channel. In addition to training and technical assistance, HUD can facilitate IDIS use by advising on processes which may increase efficiency of information collection and sharing. Many levels exist for PJs to capture and input data as housing projects oftentimes engage several public and

private stakeholders. Assistance in collection of information from these various entities would benefit PJs and may enhance administrative workflows.

State PJs are available to engage on the aforementioned responses. Please reach out if you have any related questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Dianne E. Taylor". The signature is written in a cursive style with a large initial "D" and "T".

Dianne E. Taylor  
Executive Director