



# CITY OF HOUSTON

Housing & Community Development Department

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July 14, 2021

Office of the Chief Information Officer  
Department of Housing and Urban Development  
451 7<sup>th</sup> Street, SW  
Washington, DC 20410-0500

Re: Docket No. FR-7034–N–30; Notice of Proposed Information Collection: Housing opportunities for Persons With AIDS (HOPWA) Program; OMB Control No. 2506–0133

To Whom It May Concern:

We appreciate this opportunity to comment on the proposed information collection for HOPWA grant recipients. Generally, collection of information from subrecipients is helpful in reviewing the performance of the grantee and its agencies. It also provides a means assessing the needs of those that grant recipients strive to serve every day.

The HOPWA CAPER ("CAPER"), in particular, is an extremely robust medium for monitoring performance levels of subrecipients, which has been restricted to reporting methods that could be improved upon. The transition of the HOPWA CAPER reporting to a digital process would be a tremendous benefit for several reasons. Specifically, the use of automated data collection like permitting electronic submission of the CAPER would expand and improve the reporting procedures for many grant recipients by (1) reducing error; (2) simplifying reporting and monitoring; and (3) facilitating monthly reporting.

## **Reducing Error**

Electronic submission of the HOPWA CAPER would reduce human error. Many times, non-electronic reporting is less efficient because it has to be manually updated from multiple sources. This is time consuming, and the final report may not be completely accurate due to simple mistakes, duplications, and undetected differences in metric standards from various agencies. There are also costs associated with the amount of time spent reviewing and correcting non-electronic reports, which could be reduced by implementing electronic reporting procedures. Additionally, the transfer of information between the subrecipient and HUD would become less cumbersome and more efficient since all of the information would be collected and transferred electronically.

## **Simplifying Reporting and Monitoring**

The CAPER is a complex document that could be simplified using electronically submitted forms that would auto-populate totals and reports. Currently, subrecipients and agencies have to use multiple

applications to provide the information captured in the HOPWA CAPER, which complicates the reporting process. However, the implementation of the electronic process would alleviate the use of multiple applications and accelerate efficiency and timeliness in submission. Similarly, alternative or abbreviated reports, used for specific monitoring purposes, could also be generated using the information that is electronically submitted and could be used to improve performance outcomes.

### **Facilitating Monthly Reporting/Monitoring**

Recurrent reporting and monitoring is difficult when reporting is done manually and has to be constantly scrutinized by staff. However, the electronic collection of information could be completed monthly, or even daily, which would provide a means of effective monthly or recurrent reporting and monitoring for both subrecipients and agencies. Furthermore, monthly reporting will allow subrecipients and agencies to perform longitudinal reviews that assist in determining the programs that are most beneficial for eligible individuals in the long-run.

### **Conclusion**

The City of Houston requests that HUD carefully review these comments and consider revising the proposed rule for disparate impact to address the concerns above. If you have any questions, I can be contacted at (832) 394-6282 or you may contact Derek Sellers, Assistant Director, at (832) 394-6239.

Sincerely,

DocuSigned by:  
  
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Kris Robinson  
Senior Planner

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