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Via email at [PaperworkReductionActOffice@hud.gov](mailto:PaperworkReductionActOffice@hud.gov).

Anna Guido

Reports Management Officer

REE, Department of Housing and Urban Development,  
451 7th Street SW, Room 8210  
Washington, DC 20410-5000

Linda Babecki

**Re: 60-Day Notice of Proposed Information Collection: Eviction Protection Grant Program  
OMB Control No.: 2528-0331**

Dear Anna Guido, Reports Management Officer:

Please accept these comments on behalf of Legal Services of New Jersey (LSNJ), which serves as the coordinating office for the statewide system of Legal Services programs. Legal Services provides free legal assistance to low-income people across New Jersey in a wide range of civil legal issues. LSNJ's statewide Housing Eviction protection and Legal assistance Project (HELP) reaches eligible low-income tenants at risk of eviction in order to connect them to and provide legal assistance, including assistance related to pretrial activities, trial activities, post-trial activities and alternative dispute resolution. Such services are not limited to legal representation following filing of a claim of eviction, but also include assistance to tenants to avoid negative impacts associated with eviction, outreach efforts on tenants' rights to avoid potential evictions, and other eligible services. LSNJ has over fifty years of experience handling evictions, and given our grantee status under HUD's Eviction Protection Grant Program, we are submitting comments to the proposed changes to the program's information collection to enhance the quality of the information collected and, ultimately, to improve services delivered to low-income clients.

#### Comments to Revised HUD Form 52698

From our perspective, most of the added data collection points appear to be not necessary and will unnecessarily add an administrative burden, and could potentially create barriers to tenants receiving assistance..

1c. Gender Identity (select all that apply): The current report has only 4 options: Female, Male, Other, and Prefer not to respond. The form simply states "Gender Identity" with check boxes. As proposed, the form would include the additional options of "Transgender" and "Non-binary/non-conforming." LSNJ would support changes to the manner in which information is collected in order to further promote

inclusivity, if that is the reason for adding this data collection. Accordingly, LSNJ suggests HUD draft the question “1c. To which gender identity do you most identify? (select all that apply).”

10a. Preserved or Extended Housing (select all that apply). The selections are:

- |  |   |
|--|---|
| <input type="checkbox"/> Prevented eviction filing   | <input type="checkbox"/> Eviction delayed or stayed |
| <input type="checkbox"/> Tenancy preserved, client remained in home                              | <input type="checkbox"/> Eviction case dismissed    |
| <input type="checkbox"/> Lease renewed   | <input type="checkbox"/> Remedied Lockout           |
| <input type="checkbox"/> Obtained additional days to move out (number of additional days _____ ) | <input type="checkbox"/> Secured alternate housing  |

Regarding case outcomes, the selection “Secured alternate housing” does not distinguish between someone who has secured shelter placement, temporary housing, transitional housing, or other permanent housing. The instructions do not provide any explanation. It would be helpful to provide further explanation in order to ensure accurate responses.

Comments to HUD Form 52699 and HUD Form 52700

HUD Form 52699 is a new checklist for grantees to track benchmarks for the grant. It is not a form that must be submitted to HUD. HUD Form 52700 is a new worksheet that would be submitted to HUD. It tracks expenditures/vouchers by quarter. As this is already information provided to HUD in another form, it may not be necessary and may create an unnecessary administrative burden, if it is another form that grantees are required to submit.

Thank you for your consideration of these comments.

Respectfully submitted,  
Legal Services of New Jersey

By: s/ Linda Babecki  
Linda Babecki  
Chief Counsel, Housing