

**SUPPORTING STATEMENT FOR HOMELESS PROVIDER GRANT AND PER DIEM PROGRAM
VA FORM 10-0361 SERIES, OMB APPROVAL NUMBER 2900-0554**

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

Public Law 107-95 re-established a grant and per diem program for the homeless. Funds appropriated to the Department of Veterans Affairs (VA) for this program are expected to be significantly less than the total amount requested by applicants. Information must be collected to determine which applicants are eligible, and to prioritize applications for determining who will be awarded funds. VA uses VA Form 10-0361 to evaluate applicants. For all applications other than the capital grants and per diem program, procedures remain unchanged. For these other grants, VA uses subsets of the 10-0361 series forms to evaluate applicants for all the grant programs authorized under the statutory authority for VA to make homeless grants. These information requirements for this program were addressed in the Paperwork Reduction Act section of the interim VA Rule 2900-AL30 published in the Federal Register March 19, 2003. Subsequent to public comment the Final Rule was published in the Federal Register, September 26, 2003 and has been incorporated into 38 CFR 61.0-61.82. (Authority: 38 U.S.C. 501, 2002, 2011, 2012, 2061, 2064, 7721 note).

2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.

Mental Health Strategic Health Group officials in VA Central Office will use information collected to determine eligibility to receive a grant and/or per diem payments, apply the specific criteria to rate and rank each application; and to obtain information necessary to ensure that Federal funds are awarded to applicants who are financially stable and who will conduct the program for which a grant and/or per diem award was made. This procedure had been effect for over five-twelve years, and has proved effective. If this data were not collected, VA would not be able to implement the provisions of Public Law 107-95 codified at 38 U.S.C. 501, 2002, 2011, 2012, 2061, 2064, 7721 note in a responsible manner.

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.

~~—In accordance with the Government Paperwork Elimination Act, VA employed the services of Mitretek Systems to carry out benefit, cost, and risk analyses to investigate the possibility of optional electronic transmission of this data. It is Mitretek's recommendation that this is not a good candidate for re-engineering to support electronic submissions. The grant application itself is long and requires numerous attachments based on the type of application. The complicated nature of the form and the low number of application filings resulted in a cost-recovery period of over 25 years for development and implementation costs. —In an effort to comply with the implementation requirements of P.L. 106-107 VA has begun revising and streamlining their application so that potential applicants may both Find and Apply for funding through Grants.gov. Although our first effort has been to streamline the Application provisions for capital grants and per diem [VA Form 10-0361(CG)], and make this application available on Grants.gov, we plan to gradually convert all applicable applications in this series to the Grants.gov approach.~~

~~Currently, the 10-0361 series form is posted on the World Wide Web in both Word and Adobe Acrobat at <http://www1.va.gov/homeless/page.cfm?pg=3> in a format that can be filled and printed. This practice will continue until such time as the conversion to grants.gov is complete. Thus, individuals can use word processing technology to access all homeless grants available from the Department and shorten the time spent completing this form. Although the time saved is not truly significant, this does simplify the submission. The form is also available in hard copy for those who do not choose to use an electronic solution.~~

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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.

Because of the narrow scope of the required data, it does not duplicate any existing information collection.

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

Data collection has been kept to an absolute minimum to minimize the impact on small businesses.

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.

Data is collected only when there is an application for a grant and/or per diem payments.

7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OMB.

There are no such special circumstances.

8. a. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor'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 sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

The notice of Proposed Information Collection Activity was published in the Federal Register on April 20, 2006 (Volume 71, Number 76, Pages 20438 and 20439). We received no comments in response to this notice.

b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure or reporting format, and on the data elements to be recorded, disclosed or reported. Explain any circumstances which preclude consultation every three years with representatives of those from whom information is to be obtained.

In 1998 OMB approved a complete redesign of the application request and submission procedure for the Homeless. Feedback from community providers, Veteran Service Organizations, and other federal agencies on the current forms was obtained and they were questioned how they thought the application could be more utilitarian. Numerous draft versions were reviewed by VA homeless program experts and former grant panel review members. These drafts were compared with other federal program applications and VA and OMB regulations to ensure compliance. Several mock application forms were scored by VA officials and changes were again made and the application reformatted and completed. The redesign of the application assisted community-based organizations that provide services for homeless veterans in applying for funding by making the application more comprehensible and easier to complete. This redesigned application also improved the efficiency and facilitated the accuracy of the review processes, ensuring more objective scoring of applications by review panel members and increasing the productivity of the reviews. The revised application request and submission procedure improved accessibility for community providers requesting applications and asking questions about the format; lessened the time for community providers to receive application forms; and provided VA program officials with the capability of

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tracking application requests so that local VA staff could provide support for the submissions in their area. The forms developed requested essentially the same information as the form developed for the original program. However, the form sections have been modified to reflect the requirements of PL 107-95 as it relates to the each specific grant or per diem application. VA continues to solicit outside consultation with the public through the 60- and 30-day Federal Register notices.

As part of this new e-gov initiative mandated by Grants.gov, the revised application for capital grants and per diem has been set up as follows:

- The First Submission package will be submitted through Grants.gov.:
 1. The attached Instructions will be uploaded to the Grants.gov site to inform applicants how to submit the first-submission; provide a copy of the Notice of Fund Availability (NOFA); regulations; and contact information. This document will change each time we offer a grant.
 2. Standard Forms 424, 424A, 424B, and Survey on Ensuring Equal Opportunity for Applicants form are templated forms in the Grants.gov system
 3. Applicants will be able to electronically sign the following Assurances: Drug-Free Workplace; Lobbying; and Debarment, Suspension, and other Responsibility Matters as these are templated forms already in the Grants.gov system
 4. The prospective grantee will need to scan and attach IRS and CPA letter
 5. The Program Narrative is a templated form on the grants.gov system and the provider will follow the attached instructions as to what needs to be included
- The Second Submission has also been streamlined and is also attached. This document is similar to the old Section B. We have deleted some questions and combined other questions for a more concise response. If the applicant passes the First Submission, they will be asked to submit this streamlined Second Submission.

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

No payment or gift is provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

We offer no assurances of confidentiality. Since these items are filed by the name of the institution and the veterans are not identifiable by name or number, the forms are not considered to be covered by the Privacy Act. However, the files are maintained in a secure area.

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; include 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.

There are no questions of a sensitive nature.

12. Estimate of the hour burden of the collection of information:

- a. At the start of each eligibility period, VA will publish a Notice of Fund Availability (NOFA) in the

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Federal Register. We list below the anticipated response rate and estimated total burden to each NOFA: Burden per respondent is based upon an analysis of past transitional housing grant applications.

VA Homeless Providers Grant and Per Diem Program. 38 CFR §§ 61.11, 61.15, 61.17, 61.20, 61.31, 61.41, and 61.51, contains application provisions for capital grants, per diem, special needs grants, and technical assistance grants. 38 CFR §§ 61.55 and 61.70 contain requirements for compliance reports.

Application provisions for capital grants and per diem. VA Form 10-0361(CG)

Need for information & proposed use of information	Determine eligibility for capital grants & per diem	
Likely respondents	Public or nonprofit private entities	
Annual respondents		100
Frequency of annual responses		1
Annual burden hours per collection		3520
Annual reporting & recordkeeping burden hours		3,500,000

Application provisions for the Life Safety Code capital grants. VA Form 10-0361-LSC

Need for information & proposed use of information	Determine eligibility for Life Safety Code capital grants	
Likely respondents	Public or nonprofit private entities	
Annual respondents		200
Frequency of annual responses		1
Annual burden hours per collection		10
Annual reporting & recordkeeping burden hours		2,000

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Application provisions for per diem for non-capital grant recipients. VA Form 10-0361-PDO

Need for information & proposed use of information	Determine eligibility for per diem	
Likely respondents	Public or nonprofit private entities	
Annual respondents		150
Frequency of annual responses		1
Annual burden hours per collection		20
Annual reporting & recordkeeping burden hours		3,000

Application provisions for special needs grants. VA Form 10-0361-SN

Need for information & proposed use of information	Determine eligibility for a special needs grant	
Likely respondents	Public or nonprofit private entities	
Annual respondents		200
Frequency of annual responses		1
Annual burden hours per collection		20
Annual reporting & recordkeeping burden hours		4,000

Compliance reports for per diem and special needs grants. No form needed may be reported to VA in standard business narrative.

Need for information & proposed use of information	Determine compliance with the requirements of the grant	
Likely respondents	Entities receiving per diem or special needs grants	
Annual respondents		300
Frequency of annual responses		1
Annual burden hours per collection		5
Annual reporting & recordkeeping burden hours		1,500

Application provisions for technical assistance grants. VA Form 10-0361-TA

Need for information & proposed use of information	Determine eligibility for a technical assistance grants	
Likely respondents	Entities with expertise in preparing grant applications	
Annual respondents		25
Frequency of annual responses		1
Annual burden hours per collection		10
Annual reporting & recordkeeping burden hours		250

Compliance reports for technical assistance grants. No form needed may be reported to VA in standard business narrative.

Need for information & proposed use of information	Determine compliance with requirements of the grant	
Likely respondents	Entities receiving technical assistance grants	
Annual respondents		10
Frequency of annual responses		4
Annual burden hours per collection		2.25
Annual reporting & recordkeeping burden hours		90

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB 83-1.

This request covers the VA 10-0361 series of forms for VA’s Homeless Providers Grant and Per Diem Program. The separate hour burden estimates are listed on the attachment to OMB Form 83-1.

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c. Provide estimates of annual cost to respondents for the hour burdens for collections of information.

We estimate the annual cost to respondents will be \$537,750. It is estimated that one fourth of the grant proposals will be written on a pro bono basis and the remaining three fourths of the grant proposals will be written by professional grant writers at \$50 per hour.

Burden Hours	Cost per hour	Total
14,340 <u>12,840</u>	\$37.50	\$537,750 <u>481,500</u>

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 shown in Items 12 and 14).

a. There are no capital, start-up, operation or maintenance costs.

b. Architectural/engineering costs ranges from \$0 to \$3,000, depending on whether the services are donated to the non-profit entity seeking a grant and the size of the project for which funding is requested. The cost of grant writing varies depending on whether the services are donated to the nonprofit entity seeking a grant.

c. ~~There is no an anticipated capital start-up cost component or requests to provide information~~There are no additional record-keeping costs.

14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation 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.

Cost to the Federal Government is estimated at \$204,544. This is broken down by grant program in the attached table:

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COST TO THE FEDERAL GOVERNMENT

VA Form Number	Review Panel	Postage	Design/ Print Forms	Communications	Est. Cost
Grant and Per Diem Capital Grant 10-0361	<ul style="list-style-type: none"> •Review, rate, score applications--25 GS – 13/5 social workers @ \$35.75/hr average salary x 40 hours = \$35,750. •Travel-- \$165 x 5 days +Avg. Airfare @ \$650 x 25 reviewers = \$36,875 (\$72,625 total) 	Most applications retrieved from Web; so 150 mailed applications @ \$5.50 each = \$825 total	Printing--\$0.045 per page x 45 pages x 150 apps = (\$304 total)	<ul style="list-style-type: none"> •Toll-Free Phone/Fax Inquiry @ \$0.25/ min x 5/min call x 2,000 calls = \$2,500 •Information exchange--GS 13/5 @ \$35.75/hr x 5 min x 2,000 = \$5,958 (\$8,458 total) 	\$82,212
Life Safety Code Grant 10-0361-LSC	<ul style="list-style-type: none"> •Travel not needed as review done by VA HQ Facilities Management •Review, rate, and score applications--3 GS – 13/5 Architects @ average salary \$35.75/hr x 24 hours = (\$2,574 total) 	Most applications retrieved from Web, so 20 mailed applications @ \$5.50 each = \$110 total	Printing--\$0.045 per page x 18 pages x 20 apps = (\$16 total)	<ul style="list-style-type: none"> •Toll-Free Phone/Fax Inquiry @ \$0.25/ min x 5/min call x 1,000 calls = \$1,250 •Information exchange--GS 13/5 @ \$35.75/hr x 5 min x 1,000 = \$2,979 (\$746,042 total) 	\$6,929
Per Diem Non-capital grant recipients 10-0361-PDO	<ul style="list-style-type: none"> •Review, rate, score applications--25 GS – 13/5 social workers @ \$35.75/hr average salary x 40 hours = \$35,750. •Travel-- \$165 x 5 days +Avg. Airfare @ \$650 x 25 reviewers = \$36,875 (\$72,625 total) 	Most applications retrieved from Web; so 150 mailed applications @ \$5.50 each = \$825 total	Printing--\$0.045 per page x 45 pages x 150 apps = (\$304 total)	<ul style="list-style-type: none"> •Toll-Free Phone/Fax Inquiry @ \$0.25/ min x 5/min call x 2,000 calls = \$2,500 •Information exchange--GS 13/5 @ \$35.75/hr x 5 min x 2,000 = \$5,958 (\$8,458 total) 	\$82,210
Special Needs Grant 10-0361-SN	<ul style="list-style-type: none"> •Review, rate, score applications--10 GS – 13/5 social workers @ \$35.75/hr average salary x 40 hours = \$14,300 •Travel-- \$165 x 5 days +Avg. Airfare @ \$650 x 10 reviewers = \$7,325 (\$21,625 total) 	Most applications retrieved from Web site; So 50 mailed applications @ \$5.50 each = \$275 total	Printing--\$0.045 per page x 39 pages x 50 apps = (\$88 total)	<ul style="list-style-type: none"> •Toll-Free Phone/Fax Inquiry @ \$0.25/min x 5/min call x 300 calls = \$375 •Information exchange -- GS 13/5 @ \$35.75/hr x 5 min x 300 = \$894 (\$1,269 total) 	\$23,257
Compliance Reports for Tech. Assistance	<ul style="list-style-type: none"> •No travel- review by VA staff at Tampa •Review compliance reports- 1 GS –13/5 @ \$35.75/hr x 20 hours = (\$715 total) 	N/A Report sent to VA	N/A Report sent to VA	N/A	\$715
Technical Assistance Grant 10-0361-TA	<ul style="list-style-type: none"> •Review, rate, score applications--6 GS –13/5 social workers @ \$35.75/hr average salary x 24 hours = \$5,148 •Travel-- \$165 x 3 days +Avg. Airfare @ \$650 x 6 reviewers = \$5,688 (\$10,908 total) 	Most applications retrieved from Web site, so 25 mailed applications @ \$5.50 each. = \$138 total	Printing--\$0.045 per page x 39 pages x 25 applications = (\$44 total)	<ul style="list-style-type: none"> •Phone--Toll-Free Phone/Fax Inquiry @ \$0.25/min x 5/min call x 100 calls = \$125 •Information exchange -- GS 13/5 @ \$35.75/hr x 5 min x 100 = \$298 (\$423 total) 	\$10,148
Compliance Reports-Per Diem /Special Needs	<ul style="list-style-type: none"> •No travel- review by VA staff at Tampa •Review compliance reports- 1 GS –13/5 @ \$35.75/hr x 30 hours = (\$1,073 total) 	N/A Report sent to VA	N/A Report sent to VA	N/A	\$1,073
TOTAL					\$204,544

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15. Explain the reason for any program changes or adjustments in burden hours or respondent burden.

~~There are no anticipated changes~~[The 1,500 hour reduction is a direct result of streamlining the capitol grants and per diem application for the Grants.gov program and is considered a program change.](#)

16. For collections 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 the results of the information collected.

17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

VA continues to seek an exemption that waives the displaying of the expiration date on VA Forms in an effort to minimize the cost to itself of collecting, processing and using the information. If we are required to display an expiration date, it would result in unnecessary waste of existing stock of the forms. These forms are submitted to OMB for approval every three years. Inclusion of the expiration date would place an unnecessary burden on the respondent (since they would find it necessary to obtain a newer version, while VA may have accepted the old one).

18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB 83-I.

There are no exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

No statistical methods are used in this data collection.