

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS
Continuum of Care Homeless Assistance Application
2506-0112

A. Justification

1. This request is for revision of a currently approved information collection form for use in HUD's competitive homeless assistance programs authorized by the McKinney-Vento Act, as amended. The currently approved process is not electronic. The request for revision is to create an electronic Continuum of Care Homeless Assistance Grants application. The application and technical submission forms are needed to assist in the selection of proposals submitted to HUD (by State and local governments, public housing authorities, and nonprofit organizations) for the awarded funds under the Supportive Housing, Shelter Plus Care, and Section 8 Moderate Rehabilitation Single Occupancy for Homeless Individuals programs.

The homeless assistance program application has three phases. First, Continuums of Care (CoC) pre-register their CoC with HUD, claiming their geography and preliminary pro-rata need. Second, eligible organizations submit applications in response to the Continuum of Care Homeless Assistance Notice of Funding Availability (NOFA). An applicant that is successful and conditionally selected under the SHP and SRO programs must complete a second phase by providing more detailed technical information not contained in the original application. The technical submission documents contain all of the information HUD requires for the second (and final) phase prior to grant execution.

This information collection for the application for the Continuum of Care Homeless Assistance competition are currently approved under OMB No. 2506-0112 with an expiration date of March 31, 2010. The number of burden hours for this collection will decrease from the 2007 collection, despite an expected increase in the number of applicants. This is because, by becoming electronic, we have streamlined the application process. We have also removed the data collection of HMIS Data and Technical Standards from the Continuum of Care Homeless Assistance Application process.

The regulatory authority to collect this information is contained in each program rule. For SHP, 24 CFR Part 583.300(g) states "each recipient of assistance under this part must keep any records and make any reports (including those pertaining to race, ethnicity, gender, and disability status data) that HUD may require within the timeframe required." The Shelter Plus Care program rule contains a similar statement at 24 CFR 582.300(d) (1). The Section 8 Single Room Occupancy program rule contains a similar statement at 24 CFR 882.808(p).

Selection of applications for funding under Continuum of Care Homeless Assistance are based on rating factors listed in the Notice of Funding Availability (NOFA), which is published each year to announce the Continuum of Care Homeless Assistance funding round.

Subtitle C of Title IV, Steward B. McKinney Homeless Assistance Act, as amended; Subtitle F of Title IV, and Secs.441 of the Act, as amended. Program regulations can be found at 24 CFR parts 582, 583, and 882.

2. The information to be collected will be used to rate applications, to determine eligibility for Continuum of Care Homeless Assistance, to establish grant amounts, and to ensure that technical requirements are met prior to execution of a grant agreement. The technical requirements relate to a more extensive description of the various budgets for supportive services and operations, as well as acquisition, rehabilitation, new construction, contract rental calculations and sources of financing documentation. HUD will use this detailed information to determine if a project is financially feasible and whether all proposed activities are eligible.
3. This collection of information will be electronic as soon as this package is approved. HUD adopted an electronic submission process for the Continuum of Care Homeless Assistance Programs Application to streamline the application process and lessen reporting burden on applicants.
4. To avoid duplication of information, the application has been streamlined, with each data element collected only once, stored in a database, and placed in all appropriate sections of the application. Similar information used in the past cannot be used because updated information is required for reviews for final grant award; however in the future, information that remains the same from competition to competition may be stored in the database and utilized by applicants in the next competition year without re-entering the information. Information from other HUD programs cannot be used because the selections are based on current information presented by the applicant.

The creation of an electronic submission process is an attempt to lessen reporting burden on applicants. Applicants rated high enough to receive funding will be conditionally selected and required to provide more detailed technical information not contained in the original application. Since more detailed information is being asked in forms 40090-1 and 40090-2 this year, applicants will not be required to submit the SHP Technical Submission for their renewal projects. This Technical Submission document contains all the information that HUD requests for the second (and final) phase.

5. The wide range of applicants for SHP funding (including states, local governments, private nonprofit organizations, and community mental health associations that are public non-profit organizations) and the need to consider all applications on an equal basis make it difficult to give special consideration to the burden placed on small entities by the collection of information. Instead, efforts were made to minimize the burden placed on all applicants, while at the same time ensuring that sufficient information would be provided to allow HUD to determine and select the best proposals.
6. All information collected is used to carefully consider applications for funding; if HUD collects less information, or collected it less frequently, the Department could not determine the eligibility of applicants for grant funds.

7. This information is being collected in a manner consistent with the guidelines in 5 CFR 1320.6.
8. HUD published a notice in the *Federal Register* on November 19, 2007 on page 65055 soliciting public comment on this request for approval of the revised information collection. HUD received no comments from the public.
9. No payment or gift to respond is allowed.
10. No assurances of confidentiality are offered.
11. This information collection does not include any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.
12. The Continuum of Care (CoC) competition has three main parts: HUD-40090-1 (Exhibit 1), 40090-2 (Exhibit 2), and Forms 40090-3a and 40090-3b (Exhibit 3, technical submissions). As soon as this package is approved HUD-40090-1, HUD-40090-2, and HUD-40090-4 will be part of the electronic submission process. Forms 40090-3a and 40090-3b will still be available in paper format.

The Continuum of Care competition has a unique structure. A local Continuum of Care is an organization that is made up of stakeholders who are working to alleviate homelessness in a community. The Continuum of Care is responsible for completing and submitting Form HUD-40090-1 (Exhibit 1), which asks for information regarding the community's homeless issues and responses. The single form consists of various data elements. Approximately 460 CoCs, covering every geographic area of almost every state, will submit this form.

In order to be funded for specific projects, project applicants must be associated with a local Continuum, and must complete Form HUD-40090-2 (Exhibit 2) for each project they are proposing. HUD will receive approximately 6,700 project applications in 2008, receiving different number of applications for each of five types of projects. As shown in the chart below, HUD will receive the greatest number of applications for Supportive Housing Renewal projects (approximately 4,820, and the least for Section 8 SRO projects (approximately 10-15).

Applicants are required to submit several other forms in order to be funded. These forms include the SF-424 (the formal Application for Federal Assistance) and the SF-424SUPP. Once a project is conditionally selected for funding, all applicants with new projects must complete the appropriate technical submission form in Exhibit 3, depending on whether it is an SHP-new or SRO, in order to receive an actual grant.

Estimates of the public burden have been derived through program staff experience and input from previous applicants, and are shown in the table below:

Submission Documents	Number of Respondents	Responses Per Year	Total Annual Responses	Hrs per Response	Total Hours
CoC Registration Process	460	1	460	.5	230.00
User Registration Process	6,700	1	6700	.5	3,350.00
Subtotal	7,160		7,160		6,930.00
HUD-40090-1 CoC Exhibit 1 Continuum of Care (CoC) Application	460	1	460	166.00	76,360.00
Subtotal	460		460		76,360.00
HUD-40090-2 CoC Exhibit 2 Project Applications					
SHP New Projects	800	1	800	29.00	23,200.00
SHP Renewal Projects	4,820	1	4820	9.00	43,380.00
Shelter Plus Care New Projects	270	1	270	19.00	5,130.00
Shelter Plus Care Renewal Projects	800	1	800	6.00	4,800.00
Section 8 SRO Projects	10	1	10	19.00	190.00
HUD-2991- Cert of Consistency with Consolidated Plan	6,700	1	6,700	0.00	0.00
HUD-2880- Applicant/Recipient Disclosure/Update Report (2510-0011)	6,700	1	6,700	0.00	0.00
HUD-96010- Logic Model (2535-0114)	6,700	1	6,700	0.00	0.00
Subtotal	6,700		6,700		76,700.00
SF-424- Application for Federal Assistance	3,350	1	3,350	.5	1,675
SF424SUPP-Voluntary Survey on Ensuring Equal Opportunity	3,350	1	3,350	.03	100.00
HUD-92041- Sponsor's Conflict of Interest Resolution	10	1	10	0.00	0.00
HUD-27300- Regulatory Barriers (2510-0013)	3,350	1	3,350	0.00	0.00
OMB-SF-LLL-Disclosure of Lobbying Activities (where applicable)	335	1	335	.17	57.00
HUD-40090-4 Applicant Certification	3,350	1	3,350	0.00	0.00
Subtotal	3,350		3,350		1,832.00
Total for Initial Submission	10,150	2	17,670		161,822.00
Second submission for conditional accepted applicants: Exhibit 3 CoC Technical Submissions					
HUD-40090-3a SHP Tech (new)	400	1	400	9.00	3,600.00
HUD-40090-3b SRO Tech	10	1	10	11.00	110.00
Second Submission Subtotal	410		410		3,710
Total Grant Program Application Collection					
Total	10,510	3	18,080		165,532

Respondents' average annualized cost: \$21 x 165,532= \$3,476,172
184,812

13. There are no additional costs to respondents.

14. Estimates of annualized cost to the Federal government (clerical and professional staff time)

Review each Application (\$34.40 per hr. x 3 hrs. x 10,510)	\$1,084,632
Review each Technical Submission (\$34.50 per hr. x 1.5 hrs. x 5,230)	\$270,653
Notification of applicants (\$22.00 per hr. x .5 hrs. x 3,350)	\$36,850
Total	<u>\$1,392,135</u>

This revision to the currently approved package is to create an electronic submission process for the Continuum of Care Homeless Assistance Grants Competition. The number of respondents will remain approximately the same as in 2007. The cost to applicants will remain approximately the same as in 2007; however, the cost to the Federal government will be reduced. This is because staff will save a considerable amount of time not having to manually enter information into a database and verify its correctness.

15. The burden hours per respondent were lessened this year by making the application electronic and removing the collection of HMIS Data and Technical Standards data from the application process. The collection of HMIS Data and Technical Standards data will become its own process at a later date as a separate package. The overall amount of time that it will take for an applicant to complete the application should also lessen because the electronic system will ask the applicant for a piece of information only once, store it in a data base, and then populate that answer elsewhere in the application where the information is necessary. We expect the burden hours to decrease dramatically in the 2009 Competition as CoCs and applicants will be able to retrieve the information that they submitted in the 2008 Competition from the data base and change only the necessary items.
16. The results of this collection of information will not be published for statistical use.
17. No approval is sought to not display the expiration date for OMB approval of the information collection.
18. No exceptions.