

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

Continuum of Care Homeless Assistance Application—Continuum of Care Registration

A. Justification

1. This request is for a new information collection form for use in HUD's competitive homeless assistance programs authorized by the McKinney-Vento Act, as amended. The Continuum of Care Homeless Assistance Application—Registration is part of the currently approved information collection package 2506-0112. The request for a new information collection is to separate the Continuum of Care Registration from the Continuum of Care Homeless Assistance Application. It is necessary to separate this part of the currently approved package from 2506-0112 because, since the creation of an electronic system, Continuum of Care Registration occurs several months before collection of the remainder of 2506-0112. Also, the information collected during Continuum of Care Registration does not frequently change; therefore, HUD will only need to seek OMB approval every three years, as required by the Paperwork Reduction Act.

During Continuum of Care Registration HUD collects information regarding contact information of the Lead Agency in the Continuum of Care, and geographic areas being claimed by the Continuum of Care. This registration information is necessary 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, the Continuum of Care Homeless Assistance Application—Continuum of Care Registration is the first of the three phases. During this phase, Continuums of Care (CoC) pre-register their CoC with HUD, claiming their geography and preliminary pro-rata need.

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. All Continuum of Care Lead Agencies will be required to register their Continuums in the electronic system prior to the opening of the Continuum of Care Homeless Assistance competition. The information to be collected by HUD will be used to preliminarily rate applications, to determine eligibility for Continuum of Care Homeless Assistance, and to establish grant amounts. The Continuum of Care Homeless Assistance Application will be used to determine funding recipients. The registration requirements relate to a basic description of the Continuum's lead organization, primary contact information, and geographic area.
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. Potential applicants are able to log into a database driven website and type in the information required. If the potential applicant is a returning entity from 2008, (s)he will be able to retrieve the information collected in the 2008 competition and update it only as necessary.
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. Applicable information entered in Continuum of Care Registration will be pulled forward to the currently approved 2506-0112 part of the application process. For those Continuums of Care who applied in Fiscal Year 2008, information that remains the same from competition to competition will be stored in the database and may be utilized by applicants in future competition years 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 registration process is an attempt to lessen the 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.

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 and applicants would not be eligible to receive funding for that fiscal year.

7. This information is being collected in a manner consistent with the guidelines in 5 CFR 1320.6. There are no special circumstances
8. HUD published a notice in the *Federal Register* on October 24, 2008 on page 63501 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) Homeless Assistance Application—Continuum of Care Registration has one main part: the beginning of HUD-40090-1 (Exhibit 1). Approximately 500 CoCs, covering every geographic area of almost every state, will submit this form.

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	500	1	500	.5	250.00
Subtotal	500		500		250
Total Grant Program Application Collection	500	1	500		250

Respondents' average annualized cost: $\$21 \times 250 = \$5,250$

13. There are no additional costs to respondents.
14. Estimates of annualized cost to the Federal government (clerical and professional staff time)

Review each Registration ($\$34.40 \text{ per hr.} \times 1 \text{ hrs.} \times 500$) = \$17,200

We expect that the number of respondents will remain approximately the same as in 2008 when it was part of 2506-0112. The cost to applicants and the Federal government will remain approximately the same as in 2008.

15. This is a new collection; however, the data elements were formerly a part of 2506-0112. Therefore, we have information regarding burden hours from years past. The burden hours per respondent were lessened this year by bringing all information forward from the Continuum of Care Competition in Fiscal Year 2008. We expect the burden hours to continually decrease in the 2009 Competition as CoCs become more familiar with the electronic system.
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.