SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS Homelessness Prevention Fund Amendment Form/Template

A. Justification

 On February 17, 2009, President Obama signed into law the "American Recovery and Reinvestment Act of 2009." This Act authorized \$1.5 billion for the provision of the following activities: short-term or medium-term rental assistance; housing relocation and stabilization services (including housing search, mediation or outreach to property owners, credit repair, security or utility deposits, utility payments, rental assistance for a final month at a location, moving cost assistance, and case management); or other appropriate activities for homeless prevention and rapid re-housing of persons who have become homeless. The Department will distribute these funds, as required by law, to States, metropolitan cities, urban counties and territories who receive greater than \$500,000, based upon the formula authorized by Section 413 of Title IV, Subtitle B of the McKinney-Vento Homeless Assistance Act.

This request is for a new form that HUD can use to ensure that prior to grant agreement, eligible grantees meet requirements of the Homelessness Prevention Fund, hereafter referred to as the Homelessness Prevention and Rapid Re-Housing Program (HPRP). This form requires respondents to provide data in the following categories: (1) distribution and administration of funds (including oversight of subgrantees who receive grant funds); (2) summary of legally-required citizen comments; (3) collaboration and (including coordination of these funds with community resources that already provide assistance to persons who are homeless or at-risk of homelessness); and (4) estimated budget. The form, along with an SF-424 (the formal Application for Federal Assistance) and specific certifications, is considered a "substantial amendment" to each grantee's Consolidated Plan 2008 Action Plan that describes how HUD formula funding from the Office of Community Planning and Development will be distributed based on local needs and strategies. As detailed by 24 CFR Part 91, each grantee's Consolidated Plan requires that the grantee follow a pre-established citizen participation and public comment plan prior to the submission of the data to the Department.

2. The Department will use the information to ensure that statutory requirements are met prior to grant agreement, including information regarding distribution and obligation of funds. Respondents are States, metropolitan cities, urban counties, and territories.

All eligible grantees currently complete a Consolidated Plan (2506-0117) and Annual Action Plan. Since the form (along with an SF-424 and certifications) is considered a substantial amendment to the Consolidated Plan and 2008 Annual Action Plan, grantees will be required to provide information specifically for Recovery Act funds. Information is collected with respect to the citizen participation and public comment process that is required as part of the normal Consolidated Plan process, as well as the grantee's plan to collaborate with other mainstream community resources and the Continuum of Care (2506-0112) when spending this one-time allocation.

Eligible grantees have already been notified of the amounts they are eligible to receive via a HUD announcement. The grant amounts are listed online at <u>www.hud.gov/recovery</u>. Details about the application process and requirements to receive grants will be addressed in the HPRP Notice, which is expected to be published on HUD's web site on March 19, 2009 and in the Federal Register. Grantees will be required to report on how the funds were used, within time frames and formats that will be set by OMB and HUD. Details about reporting requirements will be discussed in the Notice and in subsequent HUD guidance documents. Reporting requirements will be submitted to OMB as a separate PRA process.

- 3. This collection of information will be paper-based. Because of the emergency nature of this funding opportunity, no appropriate electronic system is currently in place to accept applications electronically. In addition, because of the low number of respondents and responses, and because this is a one-time allocation, it would not be feasible or economically sound to create an electronic system for this program.
- 4. This is new information that is in response to the "American Recovery and Reinvestment Act of 2009." Therefore, no similar information exists.
- 5. Not applicable because no small entities are impacted as State and local governments are not considered small entities.
- 6. All information collected is necessary for the release of grant funds. If HUD collects less information, the Department will not be able to determine if eligible applicants were meeting statutory requirements in the spending of funds.
- 7. This information is being collected in a manner consistent with the guidelines in 5 CFR 1320.6.
- 8. HUD will publish a notice in the *Federal Register* soliciting public comment on this request for approval of the revised information collection
- 9. No payment or gift to respond is al*lowed*.
- 10. No assurances of confidentiality are offered.
- 11. The information does not include any question of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.
- 12. A contact from each of the 540 eligible respondents will be required to submit HUD-40119 on behalf of the State, urban county, metropolitan city, or territory. The estimated hour burden is 16 hours. This single form consists of various elements consisting of multiple choice selections and narrative.

By statute, HPRP allocations are based on the formula used by McKinney-Vento Emergency Shelter Grants Program. Pursuant to HUD's discretion under the Recovery Act, HUD has set a minimum grant amount of \$500,000. Funds for urban counties and metropolitan cities that fell under this threshold were reallocated to the state grantee in which the jurisdiction was located. Using this formula and the minimum resulted in a total of 540 metropolitan cities, urban counties, states, and territories that are eligible to receive HPRP funds.

Applicants are also required to submit an SF-424 and specific certifications to be funded.

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

Submission	Number of	Responses	Total Annual	Hrs per	Total
Documents	Respondents	Per Year	Responses	Response	Hours
HUD-40119	540	1	540	16	8,640.00
SF-424 – Application	540	1	540	.75	405.00
for Federal					
Assistance					
Total	540	1	540	16.75	9,045.00

Respondents' average annualized cost: \$21 x 9,045= \$189,945.00

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

Review each application (\$34.30 per hr. x 1 hr. x 540) = \$18,522.00

- 15. This is a new collection in response to the "American Recovery and Reinvestment Act of 2009."
- 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.