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

A. Justification

1. This request is for reinstatement and revision of a discontinued information collection package for use in HUD's competitive homeless assistance programs authorized by the McKinney-Vento Act, as amended. HUD discontinued this package in December 2008 because it was in the process of developing an application that was 100% electronic. The previous information collection package was 95% electronic. HUD immediately stopped collecting information once the previous package was discontinued. The request for revision and reinstatement of the discontinued package is to create a 100% electronic Continuum of Care Homeless Assistance Grants application, which will decrease the number of burden hours for this process. The application is 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 one phase. Eligible organizations submit applications in response to the Continuum of Care Homeless Assistance Notice of Funding Availability (NOFA).

   This information collection for the application for the Continuum of Care Homeless Assistance competition was approved under OMB No. 2506-0112 and was discontinued on December 31, 2008. The number of burden hours for this collection will be 139,752. By creating an electronic database, HUD has streamlined the CoC application process to allow all renewal applicants to retrieve the information that was submitted into the database the previous year and make updates to information as needed.

   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, Stewart 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. Pre-established communities, called Continuums of Care (CoC), will complete the Exhibit 1 of the Continuum of Care Homeless Assistance application which collects data about the CoC's strategic planning activities, performance, homeless populations, and data collection methods. This information will be scored using the rating factors listed in the NOFA to determine CoC rank and level of new and renewal funding. State and local governments, public housing authorities and nonprofit organizations will concurrently submit project proposals electronically. The information will be used for grantee selection and monitoring the administration of funds. Response to this request for information is required in order to receive the benefits to be derived.

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, 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. Similar information that must be updated cannot be used because the updated information is required for reviews for final grant award. 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.

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 December 24, 2008 on page 79153 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. The forms required for the Continuum of Care Homeless Assistance application are documents that must be made available to the public prior to their submission to HUD; therefore, no assurances of confidentiality are offered. Sensitive, individual-level information is not disclosed on these forms.

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 two main parts: The Exhibit 1 (formerly HUD-40090-1) and the Exhibit 2 (formerly HUD-40090-2) and will be made available on the electronic database, *e-snaps.*

    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 the Exhibit 1, which asks for information regarding the community's homeless issues and responses. The electronic application 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 the Exhibit 2 for each project they are proposing. HUD will receive approximately 7,000 project applications in 2009, 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 5,000), 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.

    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
HUD-40090-1 CoC Exhibit 1 Continuum of Care (CoC) Application	460	1	460	160.00	73,600.00
Subtotal	**460**		**460**		**73,600.00**
HUD-40090-2 CoC Exhibit 2 Project Applications					
SHP New Projects	800	1	800	29.00	23,200.00
SHP Renewal Projects	5000	1	5000	7.00	35,000.00
Shelter Plus Care New Projects	270	1	270	19.00	5,130.00
Shelter Plus Care Renewal Projects	800	1	800	1.00	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	**6,880**		**6,880**		**64,320.00**
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 Grant Program Application Collection					
Total	**10,510**	**1**	**10,510**		**139,752.00**

Respondents' average annualized cost: $21 x $139,752= $2,934,792

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
Notification of applicants ($22.00 per hr. x .5 hrs. x 3,350) $36,850
    Total $1,121,482

This request for reinstatement and revision to the discontinued information package is to create a 100% electronic submission process for the Continuum of Care Homeless Assistance Grants Competition. The number of respondents will remain approximately the same as in 2008. The cost to applicants will remain approximately the same as in 2008; 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 using a database driven system for our grants competition and removing the collection of CoC Registration and Technical Submission from the application process. The collection CoC Registration data and Technical Submission data have become their own processes. The overall amount of time that it will take for an applicant to complete the application will 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. This system was developed in 2008, and we expect a large reduction in burden hours for all renewal applicants in 2009 because 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.