**DATA COLLECTION AND REPORTING FOR HUD’S**

**McKinney-Vento Technical Assistance Narrative, Matrices, and Reporting Requirements**

**OMB PAPERWORK REDUCTION ACT SUBMISSION**

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**Table of Contents**

Part A Justification 2

A1 Need and Legal Basis 2

A2 Information Users 3

A3 Improved Information Technologies 4

A4 Duplication of Similar Information 5

A5 Small Businesses 5

A6 Less Frequent Data Collection 6

A7 Special Circumstances 6

A8 Federal Register Notice/Outside Consultation 6

A9 Payment/Gift to Respondents 6

A10 Confidentiality 7

A11 Sensitive Questions 7

A12 Burden Estimate (Total Hours and Wages) 7

A13 Capital Costs 8

A14 Cost to the Federal Government 8

A15 Program or Burden Changes 8

A16 Publication and Tabulation Dates 8

A17 Expiration Date 9

A18 Certification Statement 9

Part A Justification

A1 Need and Legal Basis

*Why is this information necessary? Identify any legal or administrative requirements that necessitate the collection.*

This request is for clearance of the Narrative, Matrices, and Reporting Requirements that will be filled out by applicants for the McKinney-Vento Technical Assistance (MV-TA) NOFA. The purpose of the MV-TA Program is to provide technical assistance (TA) to achieve the highest level of performance and results for the programs authorized by Title IV of the McKinney-Vento Act; for implementing local Homeless Management Information Systems (HMIS); and for data collection for Annual Performance Reports (APRs) and the Annual Homeless Assessment Report (AHAR). Eligible applicants include a state, unit of general local government, Public Housing Agency (PHA), a public or private nonprofit or for profit organization or intermediary, including educational institutions and area-wide planning organizations.

The NOFA requires applicants to write a narrative designed to collect data on each organization applying for MV-TA funding. The Narrative covers three factors which include an Applicant’s Capacity and Relevant Expertise, Soundness of Approach, and Achieving Results and Program Evaluation. The factors are similar to the One CPD factors for technical assistance, but have been simplified to be specifically applicable to SNAPS applicants and to reduce burden.

The Matrices are designed to accompany the MV-TA NOFA, and to collect data on the experience and expertise of the technical assistance applicants, including previous awards received by applicants. Like the Narrative factors, these questions are similar to the One CPD Matrices for technical assistance, but have been simplified to be specifically applicable to SNAPS applicants and to reduce burden. Given the diversity of competencies required and the potential diversity in applicants, the Narrative and these Matrices together will serve the indispensible role of helping HUD to identify the strongest and most appropriate applicants for TA delivery.

Each provider will develop a work plan with headquarters for each program area in which they have been awarded funds for providing services. Reporting will then be required to meet three necessary objectives regarding these plans. Through monthly record keeping and quarterly reporting, HUD will monitor the eligibility of awardees activities, evaluate their performance, and measure their performance in achieving program objectives.

All MV-TA activities undertaken by the awardees must be in compliance with 24CFR Part 583.140 of the Supportive Housing Program TA regulations.

A2 Information Users

*How is the information collected and how is the information to be used?*

The data collected through the MV-TA will be used by HUD to determine the capacity, experience, and expertise of eligible applicants for the MV-TA Program, as well as to monitor their compliance and success post-award. Completed Narratives and Matrices will be reviewed by HUD staff and incorporated into the assessment of the MV-TA application. HUD with then rank each applicant based on scoring criteria listed in the NOFA, and funds will be awarded accordingly.

Both the Narrative and the Matrices cover three factors detailed in the MV-TA NOFA: Applicant’s Capacity and Relevant Expertise, Soundness of Approach, and Achieving Results and Program Evaluation. The Narrative requires that each applicant create one continuous document that covers each of the factors, including the factor details listed in the NOFA. Factor details include subheadings such as, management, policies and procedures, quality control, outcomes, and evaluation.

The Matrices include three spreadsheets, each of which also includes a series of elements and indicators that allow for a comprehensive assessment of the applicant, the applicant’s relevant history, and the applicant’s proposed project staff. For example, the applicant must “Briefly describe up to three (3) TA engagements/activities for each applicable experience type,” including a “Needs Assessment” and “Quantifiable Outcomes.”

The three spreadsheets are comprised of the following:

* *McKinney-Vento TA Experience form (.xls or .xlsx format)* – includes an assessment of the applicants TA experience and measurable outcomes with the following: needs assessment of MV programs; direct TA in programming, strategic planning, and organizational capacity; tools and product development; and, group learning.
* *McKinney-Vento TA Personnel Expertise form (.xls or .xlsx format)* – includes an assessment of the experience of the applicant’s proposed project staff in the following areas: program requirements; project design; web technology; administration/management; skill areas; HMIS; and reporting/data.
* *Technical Assistance Awards Received form (.xls or .xlsx format)* – includes an assessment of the active technical assistance awards received including the award date, the award amount, the awarding organization, and both performance issues and the steps being taken to resolve those issue.

The work plan will be developed collaboratively between the awarded applicant and HUD. It will cover the different phases of the project, including action items, timelines, responsible staff members for each action, and outputs over time. The work plan will serve as the benchmark by which the monthly record keeping and quarterly reporting will monitor and measure project success.

**Report Submission**

The MV-TA Narrative and Matrices will be completed in conjunction with the MV-TA application. Copies of the published NOFA and application forms announced through this NOFA may be downloaded from the grants.gov website at <http://www07.grants.gov/applicants/apply_for_grants.jsp>. Respondents will include all eligible applicants including states, units of general local government, PHAs, public or private nonprofit, or for profit organization or intermediaries, including educational institutions and area-wide planning organizations.

The submission process is governed by the information and instructions found in the Notice of HUD’s Fiscal Year (FY) 2011 Notice of Funding Availability (NOFA) Policy Requirements and General Section (General Section) that HUD posted on www.Grants.gov on insert date, 2011, and this NOFA.

The application deadline is 11:59:59 p.m. eastern time on insert date, 2011. Applications must be received by Grants.gov no later than the application deadline date and time. After submission to Grants.gov, applications go through a validation process in which the application may be accepted or rejected. Applicants must allow time for this process to ensure meeting the timely receipt requirements. They will be referred to the 2011 General Section for instructions for timely receipt, including actions to take if the application is rejected.

Work plans will be worked on jointly by HUD and the awarded applicants. As part of the required report to HUD, awardees must enter TA engagements and activities into the TA database, which tracks actual outputs and outcomes achieved and describes deviations, either positive or negative, from projected results to actual results achieved. Quarterly reports will be filled out digitally by applicants and submitted electronically to HUD.

A3 Improved Information Technologies

*Describe whether, and to what extent, the collection of information is automated (item 13b1 of OMB form 83-i). If it is not automated, explain why not. Also describe any other efforts to reduce burden.*

The grants.gov interface allows for complete digital access to all of the MV-TA NOFA application materials, including the MV-TA Narrative and Matrices. As a result, applicants can download forms in real time, fill out the application digitally, and submit electronically over the web.

In addition to using grants.gov, the Narrative and Matrices have been designed to reduce the overall burden on applicants compared to previous versions of similar forms. The Narratives can be submitted in any text or PDF format, making them easy to upload electronically. The MV-TA Matrices are being submitted in Microsoft Excel format, which is much easier to populate and work with compared to the previous Microsoft Word format. This will save significant time for applicants as the spreadsheet layout is more appropriate for this type of information collection. Both the MV-TA Narratives and the Matrices have also been dramatically shortened when compared to their previous format to remove non-program specific questions, and to simplify areas that had either been too complicated or had provided HUD with data that was not most efficient in differentiating our applicants.

Work plans, monthly recordkeeping, and quarterly reporting can all be filled out electronically. Work plans will be kept on file in digital format for easy reference, and quarterly reports will be submitted electronically to HUD, reducing the burden associated with drafting, editing, and handling paper files.

A4 Duplication of Similar Information

*Is this information collected elsewhere? If so, why cannot any similar information already available be used or modified?*

The MV-TA Narrative and Matrices will be collected once per year, based on unique applicant pools and comprised of year sensitive information. The Narrative and Matrices are program specific, and so are the only assessment tools available for HUD to determine the relevant and up-to-date capacity, experience and expertise of our TA applicants.

The work plans and quarterly reports will be entirely unique, based specifically on the individual organization, the specific application awarded under this NOFA, and the progress and challenges experienced during the term of the grant.

A5 Small Businesses

*Does the collection of information impact small businesses or other small entities (item 5 of OMB form 83-i)? Describe any methods used to minimize burden.*

While the application is open to for-profit organizations, no small businesses have submitted applications in previous competitions. Applications are submitted for this competition on a voluntary basis, and all application requirements and expectations are explicitly listed in the published MV-TA NOFA. Efforts have been made to reduce burden across the board and to create an accessible application by making the process web-based and fully digital, reducing the number of questions, simplifying existing questions, and offering the Narrative, Matrices, and Reporting Doucements in a format that is familiar and easy to use.

A6 Less Frequent Data Collection

*Describe the consequence 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.*

This data will be requested and collected with each fiscal year MV-TA NOFA. The loss of this collection mechanism would severely impair HUDs ability to assess TA providers and therefore reduce the efficiency with which we can provide sound and relevant assistance to homeless assistance providers and CoCs. The net loss would accrue at the local level through less effective programming and reduced provider capacity. Failure to collect application data yearly would limit HUDs ability to incorporate timely knowledge about the applicant’s recent activity, successes and failures, and therefore have the same net effect on outcomes. Failure to collect quarterly reports would significantly impair HUDs ability to assess awardees, make adjustments, and address significant challenges that arise during the grant term.

A7 Special Circumstances

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320.6 (Controlling Paperwork Burden on the Public—General Information Collection Guidelines). There are no special circumstances that require deviation from these guidelines.

A8 Federal Register Notice/Outside Consultation

*Identify the date and page number of the Federal Register notice (and provide a copy) soliciting comments on the information. Summarize public comments and describe actions taken by the agency in response to these comments. Describe all efforts to consult with persons outside the agency.*

In accordance with the Paperwork Reduction Act of 1995, the Department of Housing and Urban Development published a notice in the Federal Register on June 16, 2011 (Vol. 76, No. 116 pp 35231) announcing the agency’s intention to request an OMB review of data collection activities for the MV-TA Narrative, Matrices, and Reporting Requirements. The notice provided a 60-day period for public comments. No comments.

A9 Payment/Gift to Respondents

*Explain any payments or gifts to respondents, other than remuneration of contractors or grantees.*

HUD does not provide remuneration to grantees for completion and submission of the MV-TA Narratives, Matrices or Reporting Requirements.

A10 Confidentiality

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

These reports do not collect any protected personal information.

A11 Sensitive Questions

*Justify any questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private.*

The MV-TA Narratives, Matrices, and Reporting Requirements do not include questions of a sensitive nature for HUD or potential applicants.

A12 Burden Estimate (Total Hours and Wages)

*Estimate public burden: number of respondents, frequency of response, annual hour burden. Explain how the burden was estimated.*

Exhibit A below demonstrates how the public burden for the MV-TA Narrative, Matrices, and Reporting Requirements were calculated based on estimated time required to complete the forms. The average annual burden for a single applicant to complete and submit the entire MV-TA NOFA is 68 hours. The average annual burden for a single awardee to complete and submit all Reporting Requirements is 60 hours. With ten expected applicants and five expected awardees, the total burden for data collection from all participants over a one-year period is estimated at 980 hours.

**Exhibit A: Estimated Annual Burden Hours for MV-TA Narrative, Matrices, and Reporting**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Activity** | **Estimated # of Respondents** | **Frequency** | **Total Annual Responses** | **Hours Per Response** | **Total Annual Hours** |
| Application | 10 | 1 | 10 | 60 | 600 |
| Matrices (forms) | 10 | 1 | 10 | 8 | 80 |
| Work Plans  | 5 | 1 | 5 | 12 | 60 |
| Quarterly Reports (including Final Report) | 5 | 4 | 20 | 6 | 120 |
| Recordkeeping | 5 | 12 | 60 | 2 | 120 |
| **TOTAL**  |  |  | **105** |  | **980** |

A13 Capital Costs

*Estimate the annual capital cost to respondents or record keepers.*

There are no capital costs for respondents beyond customary or usual business practices or that are not otherwise required to achieve regulatory compliance not associated with the collection of information for purposes of completing the MV-TA Narratice, Matrices, and Reporting.

A14 Cost to the Federal Government

*Estimate annualized costs to the Federal government.*

The federal costs associated with the review of all completed Narratives, Matrices, and Reporting Requirements are estimated to be $32,580. This calculation is based on 17.4 hours to review each MV-TA NOFA application, 10 times, and 112 hours to review each awardees yearly Reporting Requirements, 5 times, at an average hourly rate of $44.

**Exhibit B: Estimated Annualized Costs to the Federal Government**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | No. of staff | **No. of Hours per staff** | **Annual Frequency** | **Total Annual Hrs** | **Cost per Hr** | **Total Annual Cost** |
| Application retrieval and Dissemination | 1 | 30 | 1 | 30 | $30 | $900 |
| Application Review | 6 | 24 | 1 | 144 | $45 | $6,480 |
| Quarterly Report Review | 5 | 4 | 4 | 80 | $45 | $3,600 |
| Recordkeeping | 5 | 8 | 12 | 480 | $45 | $21,600 |
| TOTAL |  |  |  | **734** |  | **$32,580** |

A15 Program or Burden Changes

*Explain any program changes or adjustments in burden.*

This is a new information collection package.

A16 Publication and Tabulation Dates

*If the information will be published, outline plans for tabulation and publication.*

The information submitted is not published. Notice of the competition winners are published in the Federal Register approximately six months after receipt of applications.

A17 Expiration Date

*Explain any request to not display the expiration date.*

The OMB expiration date will be displayed on all data collection instruments. No exceptions are requested.

A18 Certification Statement

*Explain each exception to the certification statement identified in item 19.*

There are no exceptions to the certification.