

# Part A Justification

## Introduction

On May 20, 2009, Congress passed the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act). The legislation included a new Continuum of Care (CoC) Program that combines the existing Supportive Housing Program (SHP), Shelter Plus Care (S+C), and Single Room Occupancy (SRO) grants and formalized the existing CoC framework for grant application, scoring, and reporting. This PRA justification covers the requirements for registering a local or state CoC for the new combined CoC program, according to the CoC Program interim rule regulations, 24 CFR Part 578 [Docket No. FR-5476-I-01] RIN 2506-AC29, and authorized by the HEARTH Act.

## A1 Need and Legal Basis

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

The CoC Homeless Assistance Application Registration is the first part of the information collection process to be used in HUD's competitive homeless assistance program, the CoC program, authorized by the HEARTH Act. This request, however, is separate from the CoC Homeless Assistance Application. This separation is necessary due in part to the electronic management system and the fact that the CoC Registration occurs several months before collection of the CoC Homeless Assistance Application. Additionally, the information collected during CoC Registration does not frequently change; therefore, HUD will only need to seek OMB approval every three years, as required by the Paperwork Reduction Act.

CoC Registration comprises the first phase of the combined CoC Homeless Assistance information collection form. During this phase, HUD collects the contact information of the CoC Lead Agency, HMIS Lead Agency, and Homeless Resource Contact Person, as well as the geographic areas served by the CoC applicant. Additionally CoCs approve their preliminary pro-rata need and affirm their annual renewal burden, and HUD collects information regarding the CoC's board structure and the capacity of the CoC to carry out the various activities outlined in the program regulations. The 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 CoC Application.

The regulatory authority to collect this information is contained in the CoC Program interim rule and the HEARTH Act.

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

## A2 Information Users

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

All CoC Lead Agencies will be required to register their CoCs in the *e-snaps* electronic grants management system prior to the opening of the CoC Homeless Assistance competition. The registration requirements include a basic description of the CoC's lead organization, contact information, and geographic area. The information to be collected by HUD will be used to rate applications, determine eligibility for CoC Homeless Assistance, and establish grant amounts. In tandem, lead agencies will also list their continuum's programs on a Grant Inventory Worksheet (GIW) (see attachment) that will allow HUD to accurately assess individual project applications during the CoC Application process.

The GIW is pre-populated with the basic project information for all projects that are eligible for renewal funding in the coming competition, including the current grants' budget details. Respondents must verify that the information on the GIW is accurate, estimate the funds that will be requested for each grant in the CoC Homeless Assistance competition, and list any additional program changes. For the majority of grants, the information entered on this form will be a copy of the information pre-populated on the form that represents the current grant's project information. The information from the GIW is essential for operation of the CoC competition. Most importantly, the budget details will be used to estimate the program's annual renewal demand for funds, which will in turn determine resource allocation. The program details, verified by the CoC Lead Agencies, will also allow HUD to conduct an accurate assessment of renewal project applications at the completion of the application phase of the competition.

CoC Lead Agencies that have recently been part of a merger between two or more CoCs have the option of filling out a CoC Merger Worksheet. The Worksheet is designed to help communities understand the Final Pro-Rata Need that will be available to a merged CoC during the coming fiscal year. Merging CoCs may complete these calculations independently from the worksheet, however the tool is a useful aid that HUD believes dramatically simplifies the process for grantees and reduces reporting burden. This tool is not required by HUD and, when used, does not have to be returned to HUD. HUD estimates that a very small percentage of CoCs will merge in a given year.

The optional board requirement questions in the registration forms are an important part of the registration process that will lead HUD to the full implementation of HEARTH. To meet the performance goals established by statute, CoCs will need to significantly increase their capacity for strategy, planning, monitoring, and evaluation. In addition, the HEARTH Act and the Rule allow for the development of United Funding Agencies (UFAs), a significant change to the structure of the CoC and the relationship between HUD and grantees. For CoCs, this means a significant increase in the CoCs operational capacity, and high functioning CoC board. With the new goals and the UFA established by statute and regulation, HUD needs as much information as possible regarding the baseline operational readiness of CoCs. Providing CoCs with the option of reporting their board status will allow HUD to prepare for UFA applications and

estimate how our program resources will need to be allocated over the next few years of program implementation.

### **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.*

This collection of information will be electronic as soon as this package is approved. HUD adapted *e-snaps*, an existing electronic grants management system for the current CoC Homeless Assistance 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 the required information. If the potential applicant is a returning entity from the previous year's application process, the applicant will be able to retrieve the information collected from the previous year's competition and update information as needed.

### **A4 Duplication of Similar Information**

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

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 during CoC Registration will be imported to the currently approved CoC Homeless Assistance application. For CoC's that applied in the previous year's competition, information that remains the same from competition to competition will be stored in the database and may be utilized by applicants in the next year's competition.

The CoC model is only used by the CoC Homeless Assistance Programs and so information from other HUD programs is not relevant to the data collected during CoC Registration. However, the electronic registration process is designed to lessen reporting burden on applicants by preventing duplication within Homeless Assistance application and reporting tools.

### **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.*

The wide-range of applicants for CoC funding (including states, local governments, private nonprofit organizations, and community mental health associations that are public nonprofit organizations) and the need to consider all applications on an equal basis makes 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 will be provided to allow HUD to determine and select the best proposals.

## **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.*

All information collected is used to carefully to consider applications for funding. If HUD collects less information, or collects less frequently, the Department will not be able to determine the eligibility of applicants for grant funds and applicants will not be eligible to receive funding for the fiscal year.

## **A7 Special Circumstances**

*Explain any special circumstances that would cause an information collection to be conducted in a manner that would impose additional workload burden on recipients (see eight items listed in OMB guidance).*

This information is being collected in a manner consistent with the guidelines in 5CFR 1320.6. There are not special circumstances.

## **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 December 28, 2011, pages 23491 - 23492, and again on April 19, 2012, pages 23491 -23492, soliciting public comment on this request for approval of the revised information collection. HUD received no comments. A copy of the Notice is in Attachment A.

## **A9 Payment/Gift to Respondents**

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

No payment or gift to respondents is allowed.

## A10 Confidentiality

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

No assurances of confidentiality are offered.

## A11 Sensitive Questions

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

This information collection does not include any questions of a sensitive nature.

## 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-1 below demonstrates how the public burden for the CoC Homeless Assistance Application Registration, the beginning of HUD-40090-1 (CoC Application) and included in the CoC Program interim rule § 578.9 CoC application for funds, was calculated. Approximately 450 CoCs, covering every geographic area of almost every state, will submit this form, including the GIW. Estimates of public burden have been derived through program staff experience and input from previous applicants regarding the time it takes to verify the GIW and update all relevant Registration forms. The CoC Merger Worksheet referenced in question 2 above, is optional, and filled out by very few respondents, and so has a negligible overall impact on the average burden per applicant.

**Exhibit A-1: Estimated Annual Burden Hours for CoC Registration**

A	B	C	D	E	F
Submission Documents	Number of Respondents	Responses per Year	Total Annual Responses	Hours per Response	Total Hours
CoC Registration Process	450	2	450	2.00	900.00
Subtotal	450		450		900.00
<b>Total Grant Program Application Collection</b>	<b>450</b>	<b>2</b>	<b>450</b>	<b>2.00</b>	<b>900.00</b>

This is a slight increase from previous years' processes and is due primarily to the implementation of HEARTH for the CoC process, including the collection and assessment of current CoC Capacity information that has not previously been collected or assessed. The increase to 2 hours anticipates the possibility that new persons at respondent organizations may need more time to complete the process. However, our office is still confident in our estimation that for the vast majority of applicants, the completion of the relevant forms for registration will take about 1 hour. For these applicants, the process is a familiar verification of information that is largely pre-populated by our staff for their convenience.

## **A13 Capital Costs**

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

There are no additional costs to respondents.

## **A14 Cost to the Federal Government**

*Estimate annualized costs to the Federal government.*

Estimates of annualized cost to the Federal Government (clerical and professional staff time):

Registration Review: 450 CoCs x 1 hour per year x \$29\*

Total cost to the Federal Government: \$13,050

\*this figure is based on a GS-12 salary

We expect that the number of respondents will remain or decrease slightly from the FY2011 process. The cost to specific government employees may increase if respondents under their review apply as Unified Funding Agents, as this type of proposed applicant will be required to answer additional questions. However it is HUDs determination, through staff experience and expertise that fewer than 10 (potentially 1 or 2) applicants come close enough to the requirements to be able to apply as a UFA.

## **A15 Program or Burden Changes**

*Explain any program changes or adjustments in burden.*

The collection of information will incorporate new data elements reflective of the changes brought by the HEARTH Act and the CoC Program interim rule. The burden hours per respondent were slightly increased with the addition of Board and Capacity information to the registration process and to allow HUD to determine if applying respondents are eligible for Unified Funding Agent status. As stated above, HUD believes that very few CoCs will apply, and so nationally, the impact on burden will be insignificant.

## **A16 Publication and Tabulation Dates**

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

The results of this collection of information will not be published for statistical use.

## **A17 Expiration Date**

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

No approval is sought to not display the expiration date for OMB approval of information collection.

**A18 Certification Statement**

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

No exceptions.