

Supporting Statement for 2012 SNAPs CoC Application

Introduction

On May 20, 2009, Congress passed the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act). The legislation created the Continuum of Care program, which combines the existing Supportive Housing Program (SHP), Shelter Plus Care (S+C), and Single Room Occupancy (SRO) grants and codifies the existing Continuum of Care (CoC) framework for grant application, scoring, and reporting. This PRA justification covers the requirements for registering a local or state CoC submitting the Continuum of Care's plan and the application requirements for organizations that submit individual projects, including the changes required by the HEARTH Act.

A1 Need and Legal Basis

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

This information collection request is with respect to HUD's competitive homeless assistance program authorized by the McKinney-Vento Act, as amended by the HEARTH Act (42 U.S.C. 11371 *et seq.*). The Continuum of Care application process is 100% electronic. The application is needed to assist in the selection of proposals submitted by HUD (by State and local governments, public housing authorities, and nonprofit organization) for the awarded funds under the Continuum of Care Program.

The number of burden hours for this collection will increase from the previous competition package due to the increased requirements of the statute on CoC planning and system-wide selection criteria. Applicants will also be required to fully enter all data in the first year of HEARTH Continuum of Care application process due the increased requirements under HEARTH. In following years, however, applicants will be able to import most of the data from the previous competition and update information as needed.

The purpose of this information collection is to determine the Continuum of Care's progress toward: 1) promoting community-wide commitment to the goal of ending homelessness; 2) provide funding for efforts by nonprofit providers and State and local governments to quickly re-house homeless individuals and families while minimizing the trauma and dislocation caused to individuals, families, and communities by homelessness; 3) promote access to, and effective utilization of mainstream programs and programs funded with State or local resources; and 4) optimize self-sufficiency among individuals and families experiencing homelessness.

The regulatory authority to collect this information is contained in The McKinney-Vento Homeless Assistance Act as amended by S.896 The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009, SEC. 422 (a) states: "the Secretary shall award

grants, on a competitive basis, and using the selection criteria described in section 427, to carry out eligible activities under this subtitle for projects that meet the program requirements under section 426, either by directly awarding funds to project sponsors or by awarding funds to unified funding agencies.”

A2 Information Users

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

The information to be collected will be used to rate applications, determine eligibility for Continuum of Care programs and to establish grant amounts.

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 package is currently electronic and will continue to be so when this revision is approved. In [2008] HUD adopted *e-snaps*, an existing electronic grants management system for the current HEARTH CoC Program 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.

A4 Duplication of Similar Information

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

This information is unique to the Continuum of Care application, and related project applications. To avoid duplication of information within the application itself, 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. For CoC's that apply in the FY2012 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 Program and so information from other HUD programs is not relevant to the data collected during CoC Program Application.

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 May 9, 2012, page 27243 soliciting public comment on this request for approval of the revised information collection. HUD received no comments. The IFR connected to the CoC Program interim rule was published for comment on July 31, 2012. The comment period was open for 60 days, closing on October 1, 2012. No comments were received relating to this collection.

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 demonstrate how the public burden for the CoC Homeless Assistance Application. Approximately 450 CoCs, covering every geographic area of almost every state, will submit this form. Estimates of public burden have been derived through program staff experience and input from previous applicants

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 Applications					
CoC HIC Process (this row includes the Subpopulation Extrapolation Tool, Stratified Extrapolation Tool, Housing Inventory Chart, and a General Extrapolation Tool)	450	1	450	8.00	3,600
CoC PIT Process	450	1	450	8.00	3,600
CoC Application Process	450	1	450	200.00	90,000
Subtotal	450		1,350		97,200
Total Grant Program Application Collection	450	1	1,350	216.00	97,200
Project Applications					
Renewal Project Applications	7,153	1	7,153	29.00	207,437
New Project Applications	731	1	731	7.00	5,117
CoC Planning Applications	450	1	450	2.00	900
UFA Planning Applications	225	1	225	2.00	900

HUD-2991- Cert of Consistency with Consolidated Plan	8,559	1	8,559	0.17	1,455
HUD-2880- Applicant/Recipient Disclosure/Update Report (2510-0011)	8,559	1	8,559	0.02	171
Subtotal	8,559		25,677		215,980
SF-424- Application for Federal Assistance	4,167	1	4,167	0.50	2,084
SF424SUPP-Voluntary Survey on Ensuring Equal Opportunity	4,167	1	4,167	0.03	125
HUD-92041- Sponsor's Conflict of Interest Resolution	10	1	10	0.02	0
HUD-27300- Regulatory Barriers (2510-0013)	4,167	1	4,167	0.02	83
OMB-SF-LLL-Disclosure of Lobbying Activities (where applicable)	4,167	1	4,167	0.17	708
HUD-40090-4 Applicant Certification	4,167	1	4,167	0.02	83
HUD-50070 – Certification for a Drug-Free Workplace	4,167	1	4,167	0.02	83
Subtotal	3,350		25,012		3,167
Total Grant Program Application Collection					
Total	10,510	1	52,039		316,347

This is an increase from previous year's processes as the HEARTH statute requires additional reporting requirements. HUD must collect and assess current CoC Board and Capacity information that has not previously been collected or assessed. Please note that all fields with 0.02 hours, roughly one minute, simply require a signature. Total Hours for HUD-92041 above is 10 minutes – and rounding down is recorded as zero hours in this column.

Respondents' average annualized cost: $\$21 \times 314,471 = \$6,603,891$

We expect that the number of respondents will remain or decrease slightly from the FY2011 process. The cost to applicants may increase if the respondent applies as a Unified Funding Agency as this type of proposed applicant will be required to answer additional questions that will verify the capacity ability of the CoC.

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):

Review each Application (\$29 per hr. x 8 hrs. x 10,510)	\$2,438,320
Notification of applicants (\$29 per hr. x .5 hrs. x 3,350)	<u>\$48,575</u>

Total

\$2486895

*this figure is based on a GS-12 salary

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. The burden hours per respondent were increased because of statutory requirements as found in Section 427 of the statute such as: 1) the recipients previous performance regarding homelessness related to funds provided and measured by criteria that is announced by the Secretary that take into account barriers faced by homeless persons; 2) the recipients plan to reduce homelessness in the community and reducing the length of time in homelessness; 3) the methodology the recipient used to determine priority of funding local projects; 4) the extent to which the amount of assistance to be provided will be supplemented with resources from other public and provide sources; and 5) demonstrated coordination by the recipient with other Federal, State, local, private, and entities serving individuals and families experiencing homelessness

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.