

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

Continuum of Care Homeless Assistance Application—Technical Submission

A. Justification

1. This request is for an extension of a currently approved information collection form for use in HUD's competitive homeless assistance programs authorized by the McKinney-Vento Act, as amended. This request makes no changes to the existing collection.

The Continuum of Care Homeless Assistance Application—Technical Submission is part of the information collection package 2506-0112. The request for an extension of a currently approved information collection is to separate the Continuum of Care Technical Submission from the Continuum of Care Homeless Assistance Application. It is necessary to separate this part of the package from 2506-0112 because Technical Submission occurs several months after the Continuum of Care Application process. Also, the information collected during Continuum of Care Technical Submission does not frequently change; therefore, HUD will only need to seek OMB approval every three years, as required by the Paperwork Reduction Act.

The technical submission forms are needed to obtain more detailed technical information not contained in the Continuum of Care Homeless Assistance Grant Application (HUD-40090-1 and HUD-40090-2) (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 three phases, the Continuum of Care Homeless Assistance Application—Technical Submissions is the final of the three phases. An applicant that is successful in the first two phases and conditionally selected under the SHP and SRO programs must complete the third phase by providing more detailed technical information not contained in the original application. The technical submission documents contain all of the information HUD requires for the third (and final) phase prior to grant execution.

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, Steward 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. Applicants who are successful in the Continuum of Care Homeless Assistance Grant competition are required to submit more detailed technical information. The information to be collected will be used to ensure that technical requirements are met prior to execution of a grant agreement. The technical requirements relate to a more extensive description of the various budgets for supportive services and operations, as well as acquisition, rehabilitation, new construction, contract rental calculations and sources of financing documentation. HUD will use this detailed information to determine if a project is financially feasible and whether all proposed activities are eligible.
3. The technical submission was previously streamlined to avoid duplication of information, with each data element collected during the competition, stored in a database, and available for reference during technical submission from which the applicant or HUD can make appropriate changes. Applicants are not required to submit the SHP Technical Submission for their renewal projects as a result of other past de-duplication efforts.

This Technical Submission document contains all the information that HUD requests for the third (and final) phase of the competition.

It is HUD's intention for the technical submission to be completely electronic in the next 18 months and for the application to be directly connected to the forms required under this collection. The electronic version will significantly cut down on the time it takes to complete these forms by bringing forward data that has already been entered by applicants during the early phases of the competition.

4. 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 have been 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.
5. All information collected is used to carefully consider conditional applicants for funding; if HUD collects less information, or collected it less frequently, the Department could not make a final determination of the eligibility of applicants for grant funds and conditional applicants would not be eligible to sign grant agreements and receiving funding.
6. This information is being collected in a manner consistent with the guidelines in 5 CFR 1320.6.

7. HUD published a notice in the *Federal Register* on April 23, 2012 on page 24214 soliciting public comment on this request for approval of the revised information collection. HUD received no comments from the public.
8. No payment or gift to respond is allowed.
9. No assurances of confidentiality are offered.
10. 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.
11. The Continuum of Care (CoC) Homeless Assistance Application—Technical Submission has one main part: Forms 40090-3a and 40090-3b (Exhibit 3, technical submissions).

Once a project is conditionally selected for funding, all applicants with new projects must complete the appropriate technical submission form in Exhibit 3, depending on whether it is an SHP-new (HUD-40090-3a) or SRO (HUD-40090-3b), in order to receive an actual grant.

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
Exhibit 3 CoC Technical Submissions					
HUD-40090-3a SHP Tech (new)	490	1	490	9.00	4,410.00
HUD-40090-3b SRO Tech	10	1	10	11.00	110.00
Submission Subtotal	500		500		4,520
Total Grant Program Application Collection					
Total	500	1	500		4,520

Respondents' average annualized cost: $\$21 \times 4,520 = \$94,920$

12. There are no additional costs to respondents.
13. Estimates of annualized cost to the Federal government (clerical and professional staff time)

Review each Technical Submission ($\$34.50$ per hr. \times 1.0 hrs. \times 4,520)= $\$155,940$

This new package creates an electronic submission process for the Continuum of Care Homeless Assistance Grants Competition—Technical Submission. The number of respondents will be expected to be approximately 500 and the cost to applicants is expected to be approximately $\$94,920$. The cost to the Federal government is expected to

be approximately \$155,940. These costs remain similar to when this package was part of 2506-0112, with the cost to the Federal Government reduced slightly.

14. This is an extension of a currently approved data collection. We have concrete information regarding burden hours from years past. The burden hours per respondent were significantly lessened in 2009 by making the application electronic and bringing forward all of the information for reference from the Continuum of Care Homeless Assistance Application (HUD-40090-1 and HUD-40090-2).
15. The results of this collection of information will not be published for statistical use.
16. No approval is sought to not display the expiration date for OMB approval of the information collection.
17. No exceptions.