

## SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS Continuum of Care Program Homeless Assistance Application—Technical Submission

### A. Justification

1. This request is for an extension with revisions of a currently approved information collection form for use in HUD's competitive homeless assistance programs authorized by the McKinney-Vento Act, as amended by the HEARTH Act. This request revises the collection to allow respondents to complete the form electronically.

The *Continuum of Care (CoC) Program Homeless Assistance Application—Technical Submission* (Technical Submission) is closely connected to, but separate from the information collection package 2506-0112, the CoC Program Homeless Assistance Grant Application. It is necessary to separate this part of the package from 2506-0112 because Technical Submission occurs several months after the CoC Program Application process. Also, the information collected during 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 CoC Program Homeless Assistance Grant Application has three phases, and the *CoC Program Homeless Assistance Application—Technical Submissions* is the final phase. A new applicant that is successful in the first two phases and conditionally awarded under the CoC Program must complete the third phase by providing more detailed technical information not contained in the original application. The Technical Submission forms contain all of the information HUD requires for the third (and final) phase prior to grant agreement execution.

The regulatory authority to collect this information is contained in the CoC Program interim rule. 24 CFR Part 578.21(c) requires that “all issues and conditions attached to an award must be completed within the time frame established in the NOFA. Proof of site control, match, environmental review, and the documentation of financial feasibility must be completed within 12 months of the announcement of the award, or 24 months in the case of funds for acquisition, rehabilitation, or new construction.” The Technical Submission is the vehicle by which these actions are completed, while also offering a platform for grant recipients to initiate application amendments.

This year, the Technical Submission will be fully electronic and attached to our grants management system, *e-snaps*. By including the Technical Submission in *e-snaps*, grant recipients will be able to import all of their applicant profile and project application information, which significantly reduces the amount of time needed to complete the process. For the majority of grantees, the majority of this information will not change between the time of application and the time of Technical Submission. By keeping Technical Submission in *e-snaps*, grant recipients will also be using a familiar data system, ensuring that all changes are maintained and incorporated into future system interactions, and thereby reducing future reporting burden.

Selection of applications for funding under Continuum of Care Program 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 Program Homeless Assistance funding round.

The program statute can be found at Subtitle C of Title IV, Section 426, Stewart B. McKinney Homeless Assistance Act, as amended by the HEARTH Act. Program regulations can be found at 24 CFR part 578.

2. Applicants who are successful in the Continuum of Care Program 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 budgets for supportive services and operations, as well as acquisition, rehabilitation, new construction, rental assistance, leasing, 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 is completely electronic and the application is 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 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.

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

5. The wide range of applicants for CoC 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 applications.
6. All information collected is used to carefully consider conditional applicants for funding. If HUD were to collect less information, or collect it less frequently, the Department could not make a final determination concerning the eligibility of applicants for grant funds and conditional applicants would not be eligible to sign grant agreements and receive funding.

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 January 3, 2013, vol 78 on page 315 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. No assurances of confidentiality are offered.
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) Program Homeless Assistance Application—Technical Submission* has one main section in *e-snaps* under the title of “Technical Submission.”

Once a project is conditionally awarded, all applicants with new projects must complete the appropriate Technical Submission forms in *e-snaps* to receive funding. Each type of project will require a unique set of forms to meet compliance, and so the estimates below represent an average of applicants that have several forms to complete. We are anticipating a maximum of 750 responses this year, which represents a potential increase of 250 responses from previous years. This is primarily the result of the reallocation process, which allows CoCs to reallocate current renewal grant funds to create new projects without increasing their overall CoC funding demand. Some of this increase in burden hours has been mitigated by the conversion of the previous paper process to our online grants management system, *e-snaps*. While much of the content remains the same as in the previous collection, we have estimated that the move to an electronic collection will save a minimum average of 1 hour per response, for a total savings of 750 hours over the potential increase. The reduced time will also save respondents and average annualized cost of \$15,670.

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					
<i>e-snaps</i> Forms, formerly HUD-40090-3(a-b)	750	1	750	8	6,000
<b>Submission Subtotal</b>	<b>750</b>	<b>1</b>	<b>750</b>	<b>8</b>	<b>6,000</b>
<b>Total Grant Program Application Collection</b>					
<b>Total</b>	<b>750</b>	<b>1</b>	<b>750</b>	<b>8</b>	<b>6,000</b>

Respondents’ average annualized cost: \$21/hour x 6,000 hours= \$126,000

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

Review each Technical Submission ( $\$34.50 \text{ per hr.} \times .75 \text{ hrs.} \times 750$ )= \$19,406.25

This package reflects an electronic submission process for the *Continuum of Care Homeless Assistance Grants Competition—Technical Submission*. The number of respondents is expected to be approximately 750 and the cost to applicants is expected to be approximately \$126,000. The cost to the Federal government is expected to be approximately \$19,406, accounting for a reduction in review time by an average of 15 minutes due to the move from a paper to an electronic system.

15. This is an extension of a currently approved data collection. We have concrete information regarding burden hours from previous years. The burden hours per respondent were significantly lessened in 2009 by making the application electronic and providing conditional grantees with the ability to access their application information online when preparing the Technical Submission. The burden hours per grantee will be further reduced in 2013 by automatically bringing forward all of the application information into the electronic version of the Technical Submission.
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.