

Part A Justification: Continuum of Care Homeless Assistance Grant Application – Continuum of Care Registration

OMB 2506-0182

Introduction

On May 20, 2009, Congress passed the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009, which modified the existing McKinney-Vento Act that established HUD's homeless programs. The legislation included the implementation of the Continuum of Care (CoC) Program that combined the Supportive Housing Program (SHP), Shelter Plus Care (S+C) programs and formalized the existing CoC framework for grant application, scoring, and reporting. This PRA justification covers the requirements for registering a local or statewide CoC for the CoC Program Competition, 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 regulatory authority to collect this information is contained in 24 CFR Part 578, and the HEARTH Act.

The CoC Homeless Assistance Application Registration (OMB 2506-0182) is the first part of the information collection process to be used in HUD's CoC Program Competition authorized by the HEARTH Act. It is separate from the annual CoC Homeless Assistance Consolidated Application, which contains the CoC Application and the Project Applications that are covered under the approved PRA package 2506-0112. This separation is necessary due to the fact that the CoC Registration occurs several months before collection of the CoC Homeless Assistance Consolidated Application and that the information collected during CoC Registration does not frequently change.

The annual 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 Collaborative Applicant for the CoC, and the HMIS Lead as well as the geographic areas served by the CoC. Additionally, CoCs approve their Preliminary Pro-Rata Need (PPRN) amount and affirm their annual renewal demand, 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 project proposals submitted to HUD (by State and local governments, public housing authorities, and nonprofit organizations) for the awarded funds during the annual CoC competition because it provides vital information about the CoC applicants.

A2 Information Users

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

All collaborative applicants are 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 Collaborative Applicant, contact information, and geographic area. The information to be collected by HUD will be used to determine eligibility for the CoC Program Competition. To determine the total Annual Renewal Demand (ARD) amount a CoC may request for renewal funding the Collaborative Applicant will list their eligible renewal projects on a Grant Inventory Worksheet (GIW) (see attachment). To assist in this process, HUD provides all CoCs with a pre-populated GIW that includes the applicant name, project name, grant number, and budget line items for projects that are eligible for renewal funding in the coming competition. The Collaborative Applicant is to verify the information on the GIW for accuracy and make minimal corrections as needed. For the majority of projects, the pre-populated information will be found to represent the current grant's project information and remain unchanged during their review and updating.

The information from the GIW is essential for the operation of the CoC Program competition. For the CoC, the GIW allows each CoC to see all of their projects side-by-side that will be eligible for renewal in the annual competition. This then allows them to determine, in communication with HUD, the total amount of funding ARD that their CoC has available in a given competition year, which then allows them to make informed planning decisions about which projects they want to prioritize, reduce or eliminate in the actual CoC Program Competition. In turn, the program details in the GIW allow HUD to conduct an accurate assessment of renewal project applications and to determine in the aggregate what the total renewal demand for all CoCs will likely be. HUD can then determine how much of the annual appropriation will be available for new projects (once all the funding for renewals is covered), or in years of budget shortages, how much CoCs will be advised to cut from their total funding to meet the amount of funds available.

Collaborative Applicants 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 CoCs understand the Final Pro-Rata Need amount 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 CoCs 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, usually less than 10 CoCs.

The CoC Board requirement questions in the registration forms are an important part of the registration process. To meet the performance goals established by statute, CoCs, through their Collaborative Applicants, will need to significantly increase their capacity for strategy, planning, monitoring, and evaluation. In addition, the HEARTH Act and 24 CFR part 578 allows for the development of United Funding Agencies (UFAs), a significant change to the structure of the CoC and the relationship between HUD and recipients. For the Collaborative Applicants that seek UFA designation, they must demonstrate that they have the operational capacity, a high functioning CoC Board and the necessary fiscal policies and procedures in order to qualify. With UFA established by statute and regulation, HUD needs as much information as possible regarding the baseline operational readiness of Collaborative Applicants. As recently as the FY 2014 competition, 15 CoCs applied for UFA designation and only two met the requirements for UFA designation.

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 is electronic via *e-snaps*, an existing electronic grants management system for the current CoC Homeless Assistance Application. *E-snaps* streamlines the application process and lessens the 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. The GIW is an Excel file, and when it is completed and approved it is uploaded into the *e-snaps* system by the CoC.

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 Consolidated application (OMB 2506-0112). For CoCs 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 applicable only to the CoC Program 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 CoC Program 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 Program competition (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 are 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 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

The notice of proposed information collection was published in volume 79, number 176, and page 54283 of the Federal Register on September 11, 2014. Comments were due by November 10, 2014 (provide a copy) soliciting comments on the information.

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 Program Registration was calculated. Approximately 410 CoCs, covering almost every geographic area of every state including some US territories, will submit this form along with 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
<u>CoCs not applying for UFA status</u>					
CoC Registration Process	390	1	390	1	390
GIW Review and Updating	390	1	390	1	390
<i>Subtotal</i>	<i>390</i>	<i>1</i>	<i>390</i>	<i>2</i>	<i>780</i>
<u>CoCs applying for UFA status</u>					
CoC Registration Process	20	1	20	1	40
UFA Questions	20	1	20	1	20
GIW Review and Updating	20	1	20	1	20
<i>Subtotal</i>	<i>20</i>	<i>1</i>	<i>20</i>	<i>3</i>	<i>60</i>
Total Grant Program Application Collection	410	1	410	2-3 hours	840

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: 410 CoCs x 1 hour per year x \$42.80*

Total cost to the Federal Government: \$17,550

*this figure is based on a GS-13, step 1 salary

The cost to specific government employees may increase if respondents under their review apply as Unified Funding Agencies, as this type of applicant will be required to answer additional questions. However it is HUD’s determination, through staff experience and expertise, that fewer than 20 applicants apply for UFA designation, and only two Collaborative Applicants have been successful in completing the UFA process at Registration.

A15 Program or Burden Changes

Explain any program changes or adjustments in burden.

This collection of information continues the changes that were included in the previous approved package regarding the HEARTH Act and 24 CFR part 578. This package has been changed to show that the number of respondents has decreased (to 410, from 450 previously) due in large part to CoCs merging to combine resources and funding. In addition, while the total burden hours per CoC respondent stayed the same (at two hours), the registration process shown in question 12, Burden Estimate, was broken out to show that the Registration forms and the GIW are distinct estimates. While this break out has always been the case and it does not represent a programmatic change, showing it in the table provides a more detailed presentation of the information collected. Finally, the burden hours were also broken out for the small number of CoCs that apply as UFAs to incorporate the additional hour needed in their registration. As stated above, based on the program's three years of experience with UFAs, HUD expects that very few CoCs will register as UFAs each year, therefore the impact on burden will remain slight."

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.