Part A Justification: Continuum of Care Homeless Assistance Grant Application

OMB 2506-0112

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 the CoC Homeless Assistance Grant Application, also called the CoC Consolidated Application package, that includes the CoC Application, the Priority Listing and Project Applications for the CoC Program Competition according 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 is authorized by the McKinney-Vento Act, as amended by S. 896 The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 (42 U.S.C. 11371 et seq.) which states that "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."(SEC.422(a))

The CoC Homeless Assistance Grant Application (OMB 2506-0112) is the second part of the information collection process to be used in HUD's CoC Program Competition authorized by the HEARTH Act. The first part is the annual CoC Homeless Assistance Application Registration and is covered under the approved PRA package 2506-0182. This separation is necessary due in to the fact that the CoC Registration occurs several months before collection of the CoC Homeless Assistance Grant Application and that the information collected during CoC Registration does not frequently change, while the CoC Homeless Assistance Grant Application changes often to accommodate new policy priorities and new research. The third part of the CoC Program Competition process is the CoC Homeless Assistance Grant Application – Technical Submission and is covered under the approved PRA package 2506-0183. The CoC Technical Submission covers the post-grant-award process, including the processing of grant agreements

and amendments. Like with the Registration package, this separation is necessary because it occurs several months after the submission of the CoC Consolidated Grant Applications.

The CoC Homeless Assistance Grant Application (OMB 2506-0112), also called the **CoC Consolidated Application**, includes a CoC Application and Project Listing that collect information from the statewide and local CoCs, and a Project Application that collects information from the individual project recipients within those CoCs. The CoC Consolidated Grant Application is necessary for the selection of proposals submitted to HUD (by State and local governments, public housing authorities, and nonprofit organization) for the grant funds available through the CoC Program.

The purpose of this information collection is to determine each CoC's progress toward: 1) promoting community-wide commitment to the goal of ending homelessness, including homelessness among the specific subpopulations of the chronically homeless, families, youth and Veterans; 2) provide funding for efforts by nonprofit providers and State and local governments to quickly re-house homeless individuals and families into permanent housing while minimizing the trauma and dislocation caused to individuals, families, and communities by homelessness; and 3) promote access to, and effective utilization of mainstream programs and programs funded with State or local resources in order to increase self-sufficiency among individuals and families experiencing homelessness. The information also allows HUD to assess project quality according to the threshold criteria established annually by the CoC Program Competition Notice of Funding Availability (NOFA) and according to 24 CFR part 578.
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A2   Information Users

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

The entirety of the information collected in the CoC Consolidated Application is through an electronic system called *e-snaps*. There are three parts of the CoC Consolidated Application: the CoC Application, the Project Application and the Priority Listing. Project applicants submit project applications to the CoC, and the CoC is responsible for submitting all three parts of the CoC Consolidated Application as a package to HUD.   For all practical purposes, the three parts of the CoC Consolidated Application are completed simultaneously throughout the competition period. Portions of the CoC Application are dependent on the CoC's review of information submitted in the Project Applications, but much of the CoC Application can be completed independently. Similarly, the CoC can only complete the rankings on the Priority Listing in the electronic *e-snaps* system after all the Project Applications are submitted, but the CoC can make decisions about how to rank project applications at any time during the competition period.

CoC Application
The CoC Application serves as the backbone of the CoC Consolidated Application. It includes questions regarding the community's past performance and future plans for reducing homelessness and meeting the housing and related service needs of homeless individuals and families as well as the CoC's processes and procedures for running an open, inclusive, and research informed Continuum of Care. HUD uses this information to rate each CoC with a score

based on statutory, regulatory, and NOFA requirements and the score is compared both to a minimum threshold and to the scores of all other CoCs. This in turn will affect the number of individual projects (submitted through the Project Applications) that are funded and to what extent they are funded.

In FY 2015, 407 CoCs are expected to submit a CoC Application. These 407 CoCs will oversee an expected total of around 8,000 awarded projects. CoCs range dramatically in size - there are CoCs that have only one project and others that have hundreds of projects. The CoC Application is used to objectively rank CoCs, regardless of size, and determine the extent of funding awards.

Project Applications

At the heart of the CoC Consolidated Application are the Project Applications which represent the actual homelessness interventions communities are proposing to implement. The Project Applications are completed by project recipients, which are limited to State and local governments, public housing authorities, and nonprofit organizations. There are four primary types of Project Applications in FY 2015: renewal projects, new projects, CoC planning projects and UFA costs projects.

Project recipients for new and renewal projects can receive CoC grant money to provide Permanent Housing (PH), Transitional Housing (TH), or Supportive Services Only (SSO) to individuals and families that are homeless, or to fund their Homeless Management Information Systems (HMIS). The Project Application collects information on the scope of the project, the populations served, the number of units, and the detailed line items of the project's proposed budget. All this information is necessary for HUD to determine if the project is viable and eligible to be funded through the CoC Program Competition. While the renewal and new project applications are largely the same, the new project applications include additional fields designed to compensate for the lack of project history and allow HUD to conduct a sufficiently comparative application assessment.

In FY 2015 HUD expects to have approximately 4,167 project applicants (i.e. recipients) applying for 8,050 new and renewal projects. Many project recipients have multiple projects, thus the difference in the numbers. The majority of Project Applications will be for renewal CoC-funded projects (approximately 7,200). In FY 2015, due to an expansion of the types of new Project Applications allowed (as described in the FY 2015 Notice of Funding Availability (NOFA)), HUD estimates that there will be 850 Project Applications for new CoC-funded projects.

In addition to the new and renewal Project Applications for projects providing direct services to individuals and families that are homeless, each CoC is eligible to apply for a CoC planning grant. By submitting a CoC Planning Project Application CoC's can request funding that will support local planning, needs assessment, and systems coordination designed to improve CoC operations and help the CoC meet the statutory and regulatory requirements established by the HEARTH Act and 24 CFR part 578. In FY 2015 HUD anticipates that all 407 CoCs will submit a CoC Planning Project Application.

The UFA Costs Project Application is the fourth and final type of Project Application. The HEARTH Act and 24 CFR part 578 allow HUD to designate certain CoCs as United Funding Agencies (UFAs), which requires a significant change to the structure of the CoC and the relationship between HUD and recipients. The process through which a CoC applies for and is designated as a UFA is described in the CoC Registration PRA package 2506-0182. During the CoC Registration process, the CoC must demonstrate to HUD that they have strong operational capacity, a high functioning CoC Board and the necessary fiscal policies and procedures in order to qualify. Only CoCs that HUD has approved for UFA status are eligible to apply for a UFA Costs Project Application. By submitting a UFA Costs Project Application a UFA designated CoC can request funds related to the organizing and operations of the UFA, including the monitoring and evaluation of subrecipients. HUD expects five CoCs to submit UFA Planning Project Applications in FY 2015.

Priority Listing and Reallocation Forms
Each CoC must submit a Priority Listing, including Reallocation Forms, in order to complete the CoC Consolidated Application. The Priority Listing is used to allow the CoC to communicate to HUD the rank order in which it would like HUD to prioritize funding for the community's Project Applications. HUD uses this rank order as an important factor in determining which projects that pass quality threshold receive funding given the limited availability of program resources. The specific details on how the rank order is incorporated into the calculation for funding is included in the annual CoC Program Competition NOFA.

Once all Project Applications have been submitted in *e-snaps*, the CoC must review the Project Applications and rank them based on the community's needs and values, listing them from lowest (most important) to highest (least important) on the Project Listing that is submitted in *e-snaps*. The Reallocation Forms are a part of the Project Listing in *e-snaps* and are used by the CoC to identify funds from eligible FY 2015 renewal projects that will be used to create FY 2015 new projects. The CoC can reduce or eliminate any number of renewal projects and will use the Reallocation Forms to provide the grant number and component type of each relevant renewal and new grant and the amount of funds being reallocated.

The information provided in the Priority Listing is fundamental for HUD's ability to make award determinations based on the CoC's local decisions for project funding priorities.

Other Forms
The remaining forms required for the submission of the CoC Consolidated Application are required by the FY 2015 HUD NOFA General Section. With the exception of the HUD-2991-Certification of Consistency with Consolidated Plan, which is completed and submitted by the CoC, all the other documents are completed and submitted by the project applicants/recipients. These forms include the HUD-2880- Applicant/Recipient Disclosure/Update Report (2510-0011), SF-424- Application for Federal Assistance, SF424SUPP-Voluntary Survey on Ensuring Equal Opportunity, HUD-92041- Sponsor's Conflict of Interest Resolution, HUD-27300-Regulatory Barriers (2510-0013), OMB-SF-LLL-Disclosure of Lobbying Activities (where applicable), HUD-40090-4 Applicant Certification, and HUD-50070 – Certification for a Drug-Free Workplace.

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 renewing an existing grant 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 only as needed, dramatically reducing the time required for application completion. The GIW is an Excel file, and when it is completed and approved it is uploaded into the *e-snaps* system by the CoC. All "Other Forms" described in response to the previous question are either uploaded to the *e-snaps* system by the CoC or completed electronically as part of the application.

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 (OMB 2506-0182) and project information stored from previous years' applications are imported to the CoC Consolidated Grant Application through the *e-snaps* system, dramatically reducing the amount of information reentered from part to part and from year to year. In addition, applicable information from the CoC Consolidated Application will be imported and used in the CoC Homeless Assistance Grant Application - Technical Submission (OMB 2506-0183), the final part of a the three part process, to complete grant agreements.

The CoC model is applicable only to the CoC Program and so information from other HUD programs is not relevant to the data collected during CoC Registration, CoC Consolidated Application, or Technical Submission. HUD has made every effort to bring information forward from previous years' applications, and thus limit duplication; however some of the information collected is prospective or reliant on current data sets. This new information is always program specific and asks only for information that is not captured in any other federal database.

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 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, determine project and CoC quality, or incorporate local needs and priorities, 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 5 CFR 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.

Was published in the Federal Register on August 11, 2015, Vol 80; page 48118, comments was received and answered..

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 the public burden for the CoC Consolidated Application. Approximately 407 CoCs, covering every state and U.S. territory, will submit this form. The number of respondents has been determined based on information provided in the actual FY 2015 CoC Registration process that provides information on the number of CoCs that plan to apply in FY 2015, and the number of renewal project applications and applicants that intend to apply in FY2015. 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 Submission Documents	B Number of Respondents	C Responses per Year	D Total Annual Responses	E Hours per Response	F 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)	407	1	407	8.00	3,256
CoC PIT Process	407	1	407	8.00	3,256
CoC Application	407	1	407	192	78,144
CoC Priority Listing and Reallocation Forms	407	1	407	8	3,256
HUD-2991- Cert of Consistency with Consolidated Plan	407	1	407	3	1,221
Subtotal CoC Application Submissions	**407**	**1**	**407**	**219.00**	**89,133**

Project Applications					
Renewal Project Applications	**7,200**	1	7,200	12	86,400
New Project Applications	**850**	1	850	24	20,400
CoC Planning Applications	**407**	1	407	4	1,628
UFA Costs Applications	**5**	1	5	2.00	10
HUD-2880- Applicant/Recipient Disclosure/Update Report (2510-0011)	4,167	1	4,167	0.25	1041.75
SF-424- Application for Federal Assistance	4,167	1	4,167	0.50	2,083.5
SF424SUPP-Voluntary Survey on Ensuring Equal Opportunity	4,167	1	4,167	0.03	125.01
HUD-92041- Sponsor's Conflict of Interest Resolution	10	1	10	0.02	0.2
HUD-27300- Regulatory Barriers (2510-0013)	4,167	1	4,167	0.02	83.34
OMB-SF-LLL-Disclosure of Lobbying Activities (where applicable)	4,167	1	4,167	0.17	708.39
HUD-40090-4 Applicant Certification	4,167	1	4,167	0.02	83.34
HUD-50070 – Certification for a Drug-Free Workplace	4,167	1	4,167	0.02	83.34
Subtotal of Project Applications Submissions (Renewal, New, UFA and Planning)	**8,462**	1	**8,462**		**112,646.87**
Overall Total CoC Consolidated Application (Total Project Applications plus CoC Applications)	**8,869**	1	**8,869**		**201,779.87**

Please note that all fields with 0.02 hours, roughly one minute, simply require a signature.

Respondents' average annualized cost: $22/hour x 201,779.87 = $4,439,157.14

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 CoC Application ($44* per hr. x 1.5 hrs. x 814**)	$53,724
Review each Project Application ($44 per hr. x 0.25 hrs. x 8,462)	$93,082
Notification of awards to applicants ($44 per hr. x .5 hrs. x 4,574)	$100,628
Total	$247,434

A15   Program or Burden Changes

Explain any program changes or adjustments in burden.

At 201,779.87 hours, there is an overall decrease in the number of burden hours from the most recently approved PRA package (316,347 hours). For most requirements, with the notable exceptions of the completion of new Project Applications and the Planning Project Applications, the burden hours were reduced.

In the case of the CoC Application, the reductions are the result of the smaller number of CoCs that are expected to apply due to CoC mergers that have occurred since the last PRA review (407 versus 410 in 2012). Time is also reduced slightly on account of the CoC Priority Listing now being broken out from the CoC Application making it easier for CoC's to understand the process for reallocating funds from renewal to new projects and for reviewing and ranking all of the project applications they will submit to HUD. The estimated time per applicant needed to complete the HUD-2991 form was increased to more accurately reflect the amount of time it takes to complete this form; however, the total burden time for the HUD-2991 form decreased because the number of respondents was changed to reflect the form's submission by the CoC.

There were several changes to the number of burden hours for the Project Applications. The renewal Project Application burden hours, the largest contributing factor to the Project Application burden, decreased significantly due to the added functionality of bringing forward information from previous applications. The new Project Applications burden hours increased significantly due to the increased opportunity for new projects to apply in the FY 2015 CoC competition, which will result in greater number of applicants submitting new Project Applications. Individual new Project Applications have historically required more time to prepare than renewal Project Applications due to the incorporation of unique questions that describe new projects in greater detail; however, the overall burden for new Project Applications is significantly lower than the burden for renewal Project Applications because renewal Project Applications are far more numerous. Finally, new planning Project Applications are estimated at a higher number of hours per response, and the expected number of UFA planning Project Applications received has been decreased to accurately reflect HUD's recent experience with the number of applicants. The two grant types are still relatively new and HUD will continue to monitor the average length of completion to more accurately describe and then limit the burden on project applicants.

The overall table was updated to accurately reflect the unduplicated total number of respondents, which was calculated by adding the total number of CoC Applications with the total number of Project Applications. The number of UFA Planning Project Applications was also changed to reflect actual recent experience in the number respondents.

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.