



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

ASSISTANT SECRETARY FOR
COMMUNITY PLANNING AND DEVELOPMENT

August 15, 2016

Mr. Joseph Nye
OMB Desk Officer
Office of Management and Budget
New Executive Office Building
Washington, DC 20503

Dear Mr. Nye:

The Department requests an emergency review of the Paperwork Reduction Act (PRA) requirements for the “Department of Housing and Urban Development Youth Homelessness Demonstration Program” (Request). In compliance with the requirements of 5 CFR 1320.13, this letter requests emergency processing within 5 business days from the date of submission to OMB of the information collection described in this letter and in the accompanying Supporting Statement.

The basis for the request is that this new demonstration program, the Youth Homelessness Demonstration Program (YHDP), was unexpectedly included in the Consolidated Appropriations Act, 2016, the normal process will likely prevent or disrupt collection, and the risk of public harm if the normal PRA procedures are followed. Development of this complex program took time, and the normal PRA procedures can take approximately 120 days. While it is gratifying to have Congress focus on helping to end youth homelessness, this was not a program that HUD requested for Fiscal Year 2016 and it was not in either the House or Senate 2016 appropriations bills for HUD.

The Consolidated Appropriations Act directs HUD to design the YHDP so that the Administration may know how communities can successfully approach the goal of preventing and ending youth homelessness by building comprehensive systems of care, and provides for Continuums of Care (CoCs) to better understand and address the needs of the subgroups of unaccompanied youth, including pregnant and parenting, Lesbian, Gay, Bisexual, Transgender, and Questioning (LGBTQ), and minor age youth across the entire community, rather than through the implementation of a single project. This is not a simple demonstration to design, and HUD needed to engage in significant outreach to others in the Administration and in the field (including listening sessions with over 500 participants) in determining the best approach to launch this program. Given the comprehensive nature and complexity of the YHDP, HUD did not have the time that HUD would have liked to prepare for its design, and determine, early on, the information that would be needed to launch the program.

Timing is also a significant concern for the successful operation of the YHDP and limiting burden for applicants, recipients and the federal government. The multi-phase process that is necessary to allow communities to plan, develop, and implement comprehensive community responses to ending youth homelessness will require the full use of the time allowed for obligating the appropriated funds. Any additional delay in the release of the notice of funding availability

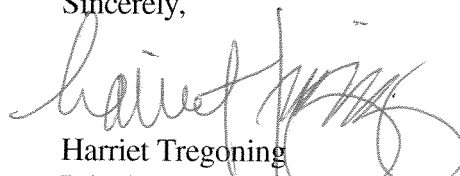
(NOFA) may push some community project applications well beyond 2018. The YHDP NOFA is also expected to overlap with the current CoC Program Competition NOFA, which is critical to allow communities to leverage the work that they are already conducting for their CoC Applications and to align grant administration processes that will effectively reduce burden.

Although not requested, this program is nevertheless essential to the mission of HUD, and to meeting the Administration's goal to end youth homelessness by 2020 as described in the Obama Administration's 2010 *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*¹. The YHDP is also carrying out President Obama's vision for transforming communities into communities of opportunity, while also building a smarter, more effective government. YHDP leverages a community approach that encourages cross systems collaboration and systems integration. It is person-centered, includes requirements for positive youth development and active youth participation, supports an allocation strategy that maximizes resources across a service area, and places data at the center of planning decisions and continuous quality improvements.

In December of 2015, USICH published *A Coordinated Community Response*, which included a "Preliminary Vision for a Community Response" to end youth homelessness and illustrated the general components necessary for each community to prevent and end youth homelessness. It is the latest in a series of statements co-developed by HUD, the Department of Health and Human Services, the Department of Education, the Department of Labor, the Department of Justice, and other federal partners that recognize the primacy of helping communities establish coordinated youth homelessness systems as quickly as possible. This funding opportunity is President Obama's and Congress' recognition of the significant need to help empower communities to end homelessness for every one of our youth using a comprehensive community approach. There are tens of thousands of youth experiencing homelessness every single night. Getting this funding into the hands of communities with urgency is crucial to the well-being of those youth.

Thank you for your consideration in this matter.

Sincerely,



Harriet Tregoning
Principal Deputy Assistant Secretary

Enclosures

¹ United States Interagency Council on Homelessness, June 2010