

**Supporting Statement for Paperwork Reduction Act Submissions Information Collection:
Youth Homelessness Demonstration Program (YHDP)
OMB Number: 2506-0210**

Introduction

In 2010, the United States Interagency Council on Homelessness (USICH) presented Opening Doors: The Federal Strategic Plan to Prevent and End Homelessness to the President and Congress, identifying youth as one of four special populations and a goal of preventing and ending youth homelessness by 2020. A coordinated community approach lies at the heart of the strategies advocated by Opening Doors, [1] and recognizes that by engaging in a system-wide crisis response, communities can better understand their system level needs and assets, plan for and allocate new and existing resources, prevent and quickly divert youth from homelessness, and identify, engage, and respond to the needs of youth experiencing homelessness. These concepts led to the publishing in 2012 of the Youth Framework to End Youth Homelessness [2], and Preventing and Ending Youth Homelessness: A Coordinated Community Response by USICH in December of 2015[3], which included a “Preliminary Vision for a Community Response” and an attempt to illustrate the general components necessary for each community to prevent and end youth homelessness. A commitment to developing and supporting a coordinated community approach guides the Department of Housing and Urban Development’s (HUD) effort to prevent and end youth homelessness, and serves as the core methodological value for this Youth Homelessness Demonstration Program (YHDP).

The purpose of the YHDP is to support 10 communities, at least 4 of which will be rural, in the development and implementation of a coordinated community approach to preventing and ending youth homelessness, and sharing that experience with and mobilizing communities around the country toward the same end. This goal includes unaccompanied youth, including parenting youth, where no member of the household is older than 24, and can be broken down into five objectives:

1. Build national momentum. Motivate state and local homelessness stakeholders across the country to collaborate for an end to youth homelessness by forming new partnerships, addressing system barriers, conducting needs assessments, testing promising strategies, and evaluating their outcomes; through the issuance of a NOFA, supportive policy briefs, consistent cross agency messaging and the development of substantial supportive technical assistance material;
2. Evaluate the coordinated community approach. Evaluate promising strategies in the development of a coordinated community approach to end youth homelessness, including the development of local and state partnerships across sectors (i.e. with mainstream partners) and other planning operations;
3. Evaluate individual interventions. Evaluate a specific set of promising interventions in order to more accurately describe the necessary array of youth-appropriate interventions and what works for whom;

4. Evaluate performance measures. Evaluate the use of unique performance measurement strategies designed to better measure youth outcomes and the connection between youth program outcomes and youth performance measures on overall system performance for the Continuum of Care (CoC);
5. Establish a framework for federal program and TA collaboration. Determine the most effective way for federal level resources to interact within a state or local system to support a coordinated community approach to ending youth homelessness.

A1 Need and Legal Basis

Why is this information necessary? Identify any legal or administrative requirements that necessitate the collection.

The appropriation for the YHDP was made available through the Consolidated Appropriations Act, 2016 (Public Law 114-113, approved December 18, 2015), “the Act”. The Act appropriated \$33,000,000 to HUD “to implement projects to demonstrate how a comprehensive approach to serving homeless youth, age 24 and under, in up to 10 communities, including at least four rural communities, can dramatically reduce youth homelessness,” \$5 million to HUD “to provide technical assistance on youth homelessness, and collection, analysis, and reporting of data and performance measures under the comprehensive approaches to serve homeless youth, in addition to and in coordination with other technical assistance funds provided under this title,” and a further \$2.5 million to HUD “for homeless youth program evaluations conducted in partnership with the Department of Health and Human Services.” Through this NOFA, HUD is holding a competition in order to identify those 10 communities that will make best use of the congressionally appropriated funds and provide HUD with the best opportunity to meet the YHDP objectives. Without asking for this information, HUD will be unable to meet the congressional mandate within the Act.

Once communities have been selected, HUD must collect individual grant applications to meet the Act requirement that YHDP projects be renewable under the CoC Program 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.) and the CoC Program Homeless Assistance Grant Application requirements (OMB 2506-0112).

Finally, HUD must collect the Coordinated Community Plan to meet the appropriations requirement “to demonstrate how a comprehensive approach to serving homeless youth...can dramatically reduce youth homelessness.” In HUD’s experience leading similar coordinated community efforts (e.g. LGBTQ Youth Homelessness Prevention Pilot, OMB 2506-0204), the planning process is a challenging and resource intensive endeavor, requiring systems analysis, values sharing, priority negotiating, the creation of leadership structure, the development of a logic model, and a plan for constant feedback and continuous process improvement, among other things. The submission of a coordinated community plan will allow HUD to assess the ability of the selected communities to appropriately use the funding made available by Congress.

A2 Information Users

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

Information will be collected in two phases using an electronic submission process. The first phase is the community selection application submission process and the second phase includes both the project application and coordinated community plan submission processes.

The community selection submission process will use grants.gov to coordinate electronic submission of grant applications. The information collected will be used to rate community selection applications, determine eligibility for participation in the YHDP, select 10 participating communities, and establish grant amounts. Applicants, which must be collaborative applicants registered under the CoC Program (public or private nonprofit organizations, see OMB 2506-0182), will respond to narrative prompts to demonstrate their leadership capacity, the community's current youth homelessness resource capacity, the community need for youth homelessness assistance resources, the community's capacity for innovation, the current level of local collaboration among stakeholders, financial resources available to support the YHDP, and the community's data and evaluation capacity.

Project applications will be submitted on a rolling basis following the announcement of community selection. The information collected will be used to determine project eligibility and quality, whether the proposed project aligns with the community's coordinated community plan, and to determine project award amounts. Applicants must be public or private organizations and will use the HUD electronic grants management system, *e-snaps*, which is the same form and process used during the CoC Program Competition (see OMB 2506-0112). Using the same information collection tools as the CoC Program Competition is critical to ensure that the awarded project will be in compliance with and prepared to apply under the CoC Program when the first grant term expires and project grant recipients apply for renewal, as directed by the Act.

A first draft of a community's coordinated community plan to end youth homelessness must be submitted electronically via email to HUD within 6 months of the community selection announcement. The information collected will be used to determine HUD approval of a coordinated community plan, and will depend on threshold criteria, including whether the plan addresses the mandatory structural components and key HUD values included in the NOFA that are essential to a successful youth homelessness system.

This will be the first time collecting information for this new program.

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.

HUD will require an electronic submission process for all phases of the YHDP to streamline the application process and lessen reporting burden on applicants. The collection of information for the YHDP is not automated in any way. Applicants will submit applications electronically and

reviewers will review and score applications manually. Applicants do have the ability to request a waiver of the electronic submission requirement per the HUD FY 2016 NOFA General Section.

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 community selection process and project applications collect each data element only once, with one process focused at the system level and the other at the project level. The coordinated community plan is designed to develop a new and unique product for the community and the required elements have never before been requested by HUD. HUD has worked hard to eliminate overlap between the different steps in the process, and is requesting new information that has not been captured from these communities for other federal government programs, regardless of whether the applicant is a current or former recipient of federal government funds. The creation of an electronic submission process is an attempt to lessen reporting burden on applicants.

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 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 would 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.

The information will be collected one time for the purposes of this NOFA; it is required to fully assess each applicant's qualifications for the specific purposes of the YHDP. All information collected is used to carefully consider applications for selection, funding, and to determine whether the selected communities have met the expectations established by Congress. If HUD collects less information, or collected it less frequently, the Department will not be able to accurately identify eligible communities, determine the eligibility of projects and project applicants for grant funds, or ensure that funds are spent according the requirements of the Act.

A7 Special Circumstances

Explain any special circumstances that would cause an information collection to be conducted in a manner that would be conducted:

- *Requiring respondents to report information to the agency more often than quarterly;*
- *Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*
- *Requiring respondents to submit more than an original and two copies of any document;*
- *Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than 3 years;*
- *In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;*
- *Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;*
- *That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or*
- *Requiring respondents to submit proprietary trade secrets or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law*

This information is being collected in a manner consistent with the guidelines in 5 CFR 1320.6. There are no special circumstances.

- HUD will not require respondents to report information to the agency more often than quarterly;
- HUD will not require respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- HUD will not require respondents to submit more than an original and two copies of any document;
- HUD will not require respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than 3 years;
- The request is not connected with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- HUD does not require the use of a statistical data classification that has not been reviewed and approved by OMB;
- HUD does not include a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

- HUD will not require respondents to submit proprietary trade secrets or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

A8 Federal Register Notice/Outside Consultation

The YHDP NOFA was published in the Federal Register on September 2, 2016 vol. 81, page 60719 to solicit comments and public input. HUD also submitted an emergency federal register notice along with the original emergency submission to OMB followed by a 60-day federal register notice to begin the regular clearance process. HUD received no comments through this process. HUD has consulted regularly with USICH, HHS, ED, DOL, and DOJ in developing the NOFA, including all application requirements. In addition, HUD has held multiple listening sessions with key stakeholder groups to learn from their valuable experiences and perspectives. HUD has attached a brief explanation of those efforts to the package submitted to OMB.

A9 Payment/Gift to Respondents

Explain any payments or gifts to respondents, other than remuneration of contractors or grantees.

There will be no payments or gifts to respondents.

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, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The information will collect program and system level data only, and no personally identifiable information will be collected regarding current or future program participants.

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.

The YHDP has two phases and three main components:

Phase 1

Component 1. Community Selection Application

- Narrative responses; and
- Required attachments

Phase 2

Component 2. Project Application

- Narrative, grid form, numeric, and multi-choice, responses: and
- Required attachments

Component 3. Coordinated Community Plan

- Narrative-based plan

YHDP selected communities will be CoCs, or parts of CoCs, represented by the CoC collaborative applicant, a local or state government entity, local public housing authority, or a public or private nonprofit entity. These entities have demonstrated experience completing a CoC Program Competition CoC Application, which is a longer and more comprehensive system-wide homelessness system application process. The burden estimates are based on HUD’s long experience with the CoC Program Competition and the understanding that all applicants will have experience responding to similarly styled and related homelessness system questions.

YHDP project applicants will be local or state government entities, local public housing authorities, or public or private nonprofit entities. The project application closely replicates the CoC Program Competition project application which has been used in a similar form for several years and with which many applicants for the YHDP will be familiar. The burden estimates are based on HUD’s long experience with the CoC Program Competition Project Application and the understanding that many applicants will be current or former CoC Program project grant recipients and therefore will have experience responding to the exact questions in this application.

YHDP coordinated community plans will be completed by each of the 10 selected community’s CoC collaborative applicant. The plan development process is similar to the plan created for HUD’s LGBTQ Youth Homelessness Prevention Pilot (See OMB 2506-0204) and to processes conducted by partner offices at HHS. The burden estimates are based on HUD’s experience with the LGBTQ Pilot and consultations with partner offices at HHS regarding their planning processes.

Approximately 200 CoC collaborative applicants will submit applications for Component 1, 10 will submit an average of 5 applications each for Component 2, and 10 will submit plans for Component 3. Estimates of the public burden are shown in the table below:

Submission Documents	Number of Respondents	Responses Per Year	Total Annual Responses	Hours per Response	Total Hours	Hourly Cost Per Response	Annual Cost
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Component 1. Community Selection							
YHDP Community Selection Application	200	1	200	25.00	5000.00	\$25.00*	\$125,000.00
Acknowledgement of Application Receipt (HUD2993) (only applicants granted waiver to submit a paper application)	10	1	10	0.17	1.70	\$25.00	\$42.50
Subtotal			210	25.00	5001.70		\$125,042.50
Component 2. Project Application							
YHDP Project Application	10	5	50	8.00	400.00	\$25.00	\$10,000.00
HUD-2880- Applicant/Recipient Disclosure/Update Report (2510-0011)	10	5	50	2.00	100.00	\$25.00	\$2,500.00
Subtotal			50	10.00	500.00		\$12,500.00
Component 3. Coordinated Community Plan							
YHDP Plan	10	1	10	240.00	2400.00	\$25.00	\$60,000.00
Certification of Consistency with the Consolidated Plan (HUD-2991) (2506-0112)	10	1	10	0.17	1.70	\$25.00	\$42.50
Subtotal			10	240.17	2401.70		\$60,042.50
Total Application Collection					7903.40		\$197,585.00

*estimate based off \$50,000 per year industry program manager salary (~\$25 per hour)

A13 Capital Costs

Estimate the annual capital cost to respondents or record keepers.

There are no capital costs to respondents or record keepers.

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)

<u>Review Community Selection Applications</u> (\$40.46* per hr. x 2 hrs. x 200 applications)	\$16,184.00
<u>Notify Community Selection Applicants</u> (\$40.46* per hr. x .5 hrs. x 10 selected sites)	\$202.30
<u>Review Project Application</u> (\$40.46* per hr. x 2 hrs. x 60 applications)	\$4,855.20
<u>Notify Project Applicants</u> (\$40.46* per hr. x .5 hrs. x 50 awardees)	\$1,011.50
<u>Review Coordinated Community Plan</u> (\$40.46* per hr. x 2 hrs. x 10 plans)	\$809.20
<u>Notify Collaborative Applicants</u> (\$40.46* per hr. x .5 hrs. x 10 selected sites)	\$202.30
Total	\$23,264.50

*This figure is based on a GS-13, step 1 salary (\$40.46 base *)

A15 Program or Burden Changes

Explain any program changes or adjustments in burden.

There are no program or burden changes.

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 the information collection.

A18 Certification Statement

Explain each exception to the certification statement identified in item 83i-19.

No exceptions identified.