

**SUPPORTIVE SERVICES FOR VETERAN FAMILIES (SSVF) PROGRAM
APPLICATION FOR SUPPORTIVE SERVICES GRANT
VA FORM 10-10072
OMB FORM 2900-0757**

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

Consistent with the Act (38 U.S.C. 2044; RIN 2900-AN53, RIN 2900-AN81), the purpose of the Supportive Services for Veteran Families (SSVF) Program is to provide supportive services grants to private non-profit organizations and consumer cooperatives who will coordinate or provide supportive services to very low-income veteran families who are residing in permanent housing, are homeless and scheduled to become residents of permanent housing within a specified time period, or after exiting permanent housing, are seeking other housing that is responsive to such very low-income veteran family's needs and preferences. The SSVF Program is within the continuum of the Department of Veterans Affairs' (VA) homeless services programs.

The SSVF Program is unique among the other VA programs because of the population it serves and the wide range of supportive services it provides to that population. For example, unlike other VA programs, the SSVF Program permits supportive services to be provided to veterans and their family members. (While the Grant and Per Diem (GPD) program authorizes certain services for minor dependents of female veterans, it does not generally authorize the provision of supportive services to family members). Subject to SSVF Program limitations, these very low-income veteran families could be residing in permanent housing or be homeless.

VA is submitting the initial Application for Supportive Services Grant, the Renewal Application, Participant Satisfaction Survey and Compliance Report for the 3-year extension.

2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.

The items required in this application are derived from 38 U.S.C. 2044. Information collected will be used by the SSVF Program Office to determine the allocation of grant funds under VA's SSVF Program.

An Applicant Budget excel worksheet will be provided as part of the SSVF Application "Exhibit III". It is a template that applicants will utilize to provide their proposed budget to VA. Instructions for use of this template are included within the budget template.

Application for Supportive Services Grant, VA Form 10-10072:

This information is needed to award SSVF Program grants to eligible entities. Legal authority for this data collection is found under 38 U.S.C. 2044(c), which authorizes the collection of data and the application requirements prescribed for the SSVF Program and are designed to ensure that VA can fully evaluate the ability of applicants to achieve the goals of the SSVF Program.

To apply for a supportive services grant, an applicant must submit to VA a complete supportive services grant application package, as described in the Notice of Fund Availability. (VA would publish a Notice of Fund Availability in the Federal Register identifying such items as the location for obtaining supportive services grant application packages; the date, time, and place for submitting completed supportive services grant applications; the estimated amount and type of funding available, such as the amount of funds available for initial and renewal supportive services grants; the length of term for supportive services grant payments; and other information necessary for the supportive services grant application process as determined). A complete supportive services grant application package will include the following:

- (1) A description of the supportive services to be provided by the applicant and the identified need for such supportive services among very low-income veteran families;
- (2) A description of the characteristics of very low-income veteran families occupying permanent housing who will be provided supportive services by the applicant;
- (3) An estimate with supporting documentation of the number of very low-income veteran families occupying permanent housing who will be provided supportive services by the applicant and a description of the area or community where such very low-income veteran families are located, including an estimate of the total number of very low-income veteran families occupying permanent housing in such area or community;
- (4) Documentation evidencing the experience of the applicant and any identified subcontractors in providing supportive services to very low-income veteran families and very low-income families;
- (5) Documentation relating to the applicant's ability to coordinate with any identified subcontractors;
- (6) Documentation of the managerial capacity of the applicant.
- (7) Any additional information as deemed appropriate by VA.

Renewal Application VA Form 10-10072c: This data collection instrument is being developed for grantees to renew SSVF Program grants previously awarded. Legal authority for this data collection is found under 38 U.S.C. 2044(c), which authorizes the collection of data that will allow VA to fully evaluate the ability of applicants to achieve the goals of the SSVF Program and 38 CFR Part 62. This information will be used by the SSVF Program Office to determine whether to award renewal funds to existing grantees.

Participant Satisfaction Survey, VA Form 10-10072a : This data collection instrument is being revised to better capture consumer feedback about services. The net burden is unchanged as although six new questions were added, six were also eliminated. The original data collection was developed to evaluate the SSVF Program and the required report to Congress. Legal authority for this data collection is found under section 604 of Public Law 110-387, which required VA to conduct a study on the effectiveness of the SSVF Program through a comparison of this program to other VA programs. In doing so, section 604 of Public Law 110-387 requires VA to examine the satisfaction of Veterans targeted by the program. As required by Public Law 110-387, this information has been used by VA to determine the "effectiveness of the permanent housing program under section 2044 of title 38 United States Code...in meeting the needs of very low-income veteran families..." More specifically, VA will use the information collected to determine the satisfaction of Veterans participating in the SSVF-funded programs.

Compliance Reports for SSVF Program, VA Form 10-10072b: This information collection will be required to ensure grantees are complying with all program requirements set forth in 38 CFR Part 62 and their grant agreements.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The initial Application for Supportive Services Grant, VA Form 10-10072 and subsequent Renewal Application and Compliance Reports for which approval is expiring required the use of Adobe Acrobat, Microsoft Word or a comparable word processing program, and Microsoft Excel. The previous Participant Survey had to be completed by hand. The VA now uses automated and electronic collection techniques for these forms. The initial Application for Supportive Services Grant, VA Form 10-10072 and subsequent Renewal Application and Compliance Reports have been made available in an electronic format on VA's website. The electronic format requires the use of the internet to access the forms and the use of Microsoft Excel to submit Applicant Budget. The initial SSVF application and the renewal application will also be made available on grants.gov. The Participant Survey has been made available electronically to each participant by the grantee. The basis for adopting this means of collection is necessary for the proper performance of application collection and evaluation functions. It avoids unnecessary duplication and reduces burden on small entities. Electronic submission also reduces costs associated with sending and handling mail.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Information contained within these forms is expected to be original and not a duplication of any other information.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Every effort has been made to minimize the burden to small entities by keeping questions simple and to a minimum on the initial application, VA Form 10-10072. The length of the proposed application has been deemed necessary to ensure that VA awards grants only to the most qualified eligible entities. This is also applicable to the Renewal Application. The use of electronic collection techniques will reduce the burden because it will avoid duplicating materials. Electronic submission also reduces costs associated with sending and handling mail.

The Participant Satisfaction Survey form will be used to survey individuals, so no small businesses or other small entities are impacted by the information collection. Every effort is being made with the Compliance Reports for SSVF Program to minimize the burden to small businesses by keeping questions simple and to a minimum. The length of the proposed reports has been deemed necessary to ensure that grantees are conforming to program requirements. The use of electronic collection techniques will reduce burden because it will be consistent and compatible with current reporting and recordkeeping practices. It makes appropriate use of information technology.

6. Describe the consequences 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.

Collection of the initial applications, VA Form 10-10072, and/or the Renewal Application must be conducted as part of the annual Notice of Fund Availability in order to distribute available SSVF Program grant funds or to renew grant agreements, provided funds are available. These application forms may

need to be updated in the future to reflect changes made to the SSVF Program's Final Rule or Notice of Fund Availability. .

VA would not be able to conduct annual program evaluation or formal assessment of the SSVF Program if the Participant Satisfaction Survey and Compliance Reports for SSVF Program collection were not conducted or were conducted less frequently.

7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three 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 and require the use of a statistical data classification that has not been reviewed and approved by OMB.

The initial Application, VA Form 10-10072 information collections will be conducted annually. One original completed application must be submitted electronically to the Program Office. Multiple copies are not requested from each applicant and hard copies of the application are no longer required for the purposes of simultaneous evaluation by VA staff members. The evaluation is now conducted electronically. This effort is applicable to the Renewal Application as well. Equally, there are no such special circumstances for the Participant Satisfaction Survey and Compliance Reports for SSVF Program, which are also collected electronically.

8. a. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

The notice of Proposed Information Collection Activity was last published in the Federal Register on 11/28/2016 (Volume 81, Page 85693). One comment was received. There is no need for a response to the commenter due to the comment being a statement of appreciation.

b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure or reporting format, and on the data elements to be recorded, disclosed or reported. Explain any circumstances which preclude consultation every three years with representatives of those from whom information is to be obtained.

Consultation with other federal agencies, including HUD and HHS, was completed during the development phase of the program. Outside consultation was sought from the public through the 30-day comment period identified in the Federal Register notice.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift will be provided to respondents.

10. Describe any assurance of privacy to the extent permitted by law provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Information on this data collection will become part of a system of records which complies with the Privacy Act of 1974. This system is identified as "Veteran, Patient, Employee and Volunteer Research and Development Project Records-VA (34VA12)" as set forth in the Compilation of Privacy Act Issuances via online GPO access at <http://www.gpoaccess.gov/privacyact/index.html>

11. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

12. Estimate of the hour burden of the collection of information:

a. The number of respondents, frequency of responses, annual hour burden, and explanation for each form is reported as follows:

Data Collections	No. of respondents	x No. of responses	Total No. of responses	x minutes =	÷ by 60=	Annual Number of Hours
Application for Supportive Services Grants VA Form 10-10072	400	1	400	2100		14000
Renewal Application	300	1	300	600		3000
Participant Satisfaction Survey	11,250	2	22,500	15		5,625
Compliance Reports for SSVF Program	320	4	1280	135		2880
Annual Total	12270		24480	25505		
Responses per Respondent						1.96
Annual burden per response						62.5 min

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB 83-I.

This request covers the initial Application for Supportive Services Grant, VA form 10-10072, the subsequent Renewal Application, the Compliance Reports, and the Participant Satisfaction Survey.

c. Provide estimates of annual cost to respondents for the hour burdens for collections of information. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

The total cost to all respondents for completing these forms is \$586,615 (\$23 per hour x 25,505 total burden hours).

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

There are no associated costs with third parties. The survey is completed by participants and should pose no time or cost expense on grantees.

- There is no cost burden to record keepers as the survey is collected online and data (not identifiable as survey is anonymous) is kept by VA.
- Cost burden is lower than previous survey for grantees as they no longer need to handle or distribute blank survey forms to participants.
- Time should also be reduced for respondents as survey is somewhat shorter.

14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Application for Supportive Services Grant, VA form 10-10072:

The estimated annual cost to the Federal Government is \$13,092 = Processing 100 applications x \$32.73/hr (GS-12, Step 5) x 4 hrs (\$130.92)

Renewal Application: The estimated annual cost to the Federal Government is \$2,945.70 = Processing 30 applications x \$32.73/hr (GS-12, Step 5) x 3 hrs.

Participant Satisfaction Survey: The estimated annual cost to the Federal Government is \$21,513.75 = Processing 22,500 surveys x (($\$18.45/\text{hr}$ (GS-7, Step 5) x 1 min.) + ($\$38.92/\text{hr}$ (GS-13, Step 5) x 1 min.))

Compliance Reports for SSVF Program: The estimated annual cost to the Federal Government is \$5,518.80 = Processing 120 compliance reports x $\$45.99/\text{hr}$ (GS-14, Step 5) x 1 hr.

15. Explain the reason for any burden hour changes or adjustments reported in items 13 or 14 of the OMB form 83-1.

It is estimated that the burden hour for the revised SSVF data collection will be reduced from previous data collection efforts due to the introduction of electronic submissions. The overall length of the revised documents are unchanged.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Application for Supportive Services Grant, VA form 10-10072:

VA does not intend to publish this data, except to notify the selected applicants of their grant award and announce to the public the list of grant awards. This form will be published along with a Notice of Fund Availability (NOFA). Once the NOFA has been published, applicants will have 30 to 45 days to submit a completed application package. Once the application period is over, the information will be reviewed during an approximately 6-month VA evaluation period, after which SSVF Program grants will be awarded.

The following data collections will be subsequently submitted for OMB approval, following the initial applications SSVF grant's program implementation. Upon completion, each collection will be assigned a VA Form number and submitted for approval under the anticipated OMB clearance number for the Supportive Services Grants Program:

Renewal Application: VA does not intend to publish this data, except to notify the selected applicants of their grant renewal and announce to the public the list of grant awards. This form will be published along with a Notice of Fund Availability (NOFA). Once the NOFA has been published, applicants will have approximately 30 to 45 days to submit a completed renewal application package. Once the application period is over, the information will be reviewed during an approximately 6-month VA evaluation period, after which SSVF Program grants will be renewed.

Participant Satisfaction Survey: VA will publish this data in its annual reports. Grantees will be required to provide surveys to participants within 30 days of such participant's pending exit from the grantee's program. These collections will be ongoing throughout the duration of the program.

Compliance Reports for SSVF Program: VA does not intend to publish this data. Collections will occur quarterly upon execution of the grant agreements.

17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

VA is not seeking approval to omit expiration date on forms.

18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB 83-I.

There are no exceptions.