

## JUSTIFICATION FOR ADDITIONAL INFORMATION COLLECTION

### Case Management Services Grant Program OMB 2900-XXXX

#### A. JUSTIFICATION

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

Public Law 114-315 section 712 requires the Secretary to carry out a program that provides “case management services to improve the retention of housing by veterans who were previously homeless and are transitioning to permanent housing and veterans who are at risk of becoming homeless.” The program is to be provided through the award of grants. In addition, the legislation notes that in awarding the grants priority shall be given to organizations that demonstrate capability of providing case management, particularly organizations that successfully provide or have provided transitional housing services through the GPD program (having received per diem payments or Special Need grants under GPD). Additionally, an “extra priority” is to be given to those organizations that give up per diem payments or Special Need grants under GPD and convert their transitional; housing facility to provide permanent housing that meets the housing quality standards under 42 U.S.C. 1437f(o)(8)(B).

The legislation requires that regulations for the new program be developed within one year of the law being enacted (which would be December 2017) and submit a report to the Committee on Veterans’ Affairs in the Senate and the House of Representatives by June 1, 2020. This justification supports the need for the collection of information at the new 38 CFR 61.92 to determine eligibility, application, operation, and selection of awardees.

**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.**

VHA Office of Homelessness officials in VA Central Office will use information collected to determine eligibility to receive a grant and/or per diem payments, apply the specific criteria to rate and rank each application; and to obtain information necessary to ensure that Federal funds are awarded to applicants who are financially stable and who will conduct the program for which a grant and/or per diem award was made. This procedure has been effect for over twenty years, and has proved effective. If this data were not collected, VA would not be able to implement the provisions of Public Law 114-315 codified at 38 U.S.C. 501, 2002, 2011, 2012, 2061, 2064, 7721 note in a responsible manner.

**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.**

Potential applicants may locate the funding opportunity through Grants.gov; the Federal Register, or the Grant and Per Diem Web Site. There will be no specific form created for this new grant program. Rather, application requirements will be identified and posted in the Notice of Funding Availability. Typically, applicants are requested to use a standard business format for responses. Specific requirements such as font, spacing, margins are provided in the instructions.

**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.**

Because of the narrow scope of the required data, it does not duplicate any existing information collection.

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

Data collection has been kept to an absolute minimum to minimize the impact on small businesses allowing them to utilize standard business methods and formats for response.

**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.**

Data is collected when there is an application for a grant and to monitor grant performance. Without this data, the award may not be issued and compliance could not be monitored.

**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.**

There are no such special circumstances.

**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 published in the Federal Register on June 5, 2018 (Volume 83, Number 25915, Pages 25915-25920). We received no comments in response to this notice.

**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.**

As background; in 1998 OMB approved a complete redesign of the application request and submission procedure for the Homeless. Feedback from community providers, Veteran Service Organizations, and other federal agencies on the current forms was obtained and they were questioned how they thought the application could be more utilitarian. Numerous draft versions were reviewed by

VA homeless program experts and former grant panel review members. These drafts were compared with other federal program applications and VA and OMB regulations to ensure compliance.

Since that period there have been many changes to VA's Homeless Programs and the forms developed then became more difficult to properly collect the needed information. VA has since gone to collecting the information through the NOFA in a standard business format thereby allowing greater flexibility. While the requested collection of information is essentially the same information as the form developed for the original program the standard business format has allowed VA to modify the specific collection of information questions to reflect the requirements of current regulatory/statutory changes as they relate to each specific grant or per diem application without having to have the cost of modifying a new form each time a change is made. In addition, the standard business format allows applicants to use existing business resources to complete the collection. VA continues to solicit outside consultation with the public through its conference calls with providers who have previously applied regarding the application process. In addition, VA solicits comments from the public through its 60- and 30-day Federal Register notices.

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

No payment or gift is 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.**

We offer no assurances of confidentiality. As the information collected is used in selection for a competitive grant the information would only be released to the applicant agency by request on letterhead, Freedom of Information Request, or for appropriate law enforcement investigative requests. The files are maintained in a secure area and disposition of the files follow Record Control Schedule 10-1. These items are filed by the name of the institution and unique project numbers.

**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:**

At the start of each eligibility period, VA will publish a Notice of Fund Availability (NOFA) in the *wFederal Register*. Burden per respondent is based upon an analysis of past transitional housing grant applications as this is a new grant program. The number of potential respondents is an estimate.

VA NOFA	No. of respondents	x No. of responses	x No. of minutes	÷ by 60 =	Number of Hours
Application/Survey	100	1 = 100	35 = 3500		58

**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 use of a standard business format for response to VA’s Homeless Providers Grant and Per Diem Program application requirements at the newly added 38 CFR 61.92.

**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.**

Legally, respondents may not pay a person or business for assistance in completing the information collection and a person or business may not accept payment for assisting a respondent in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VHA estimates the total cost to all respondents to be \$1,411.72 (58 burden hours x \$24.34 per hour).

May 2017 National Occupational Employment and Wage Estimates United States:  
[https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm)

**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).**

- a. There are no capital, start-up, operation or maintenance costs.
- b. Cost estimates are not expected to vary widely. The only cost is that for the time of the respondent.
- c. Costs associated with any recordkeeping burden have been previously approved under OMB 0348-0040 (Assurances - Non-Construction Programs, SF 424B) and OMB 2900-0554 (VA Homeless Provider Grant and Per Diem Program).

**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.**

The estimated annual cost of VA collection of information to the Federal Government is: \$52,650.00.

Processing: review, rate and score applications, 10 GS 13/5 x 40 hrs. at \$47.00 per hour = \$18,000.00.  
Travel: Avg. per diem of \$187 x 5 days +Avg. Airfare @ \$1,500. x 10 reviewers = \$24,350.00.  
Communications: Toll-Free Phone/Fax Inquiry @ \$0.25/ min x 5/min call x 2,000 calls = \$2,500.00.  
Information exchange--GS 13/5 @ \$47/hr ÷ 60 = .78 x 5 min x 2,000 = \$7,800.00.  
Total = \$52,650.00

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

This is a new collection and all burden hours are considered a program increase.

**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.**

VA does not intend to publish this data.

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

As there are no longer any forms VA continues to seek an exemption that waives the displaying of the expiration date as it would be impractical to have applicants display a date. This would aid to minimize the cost to itself of collecting, processing and using the information.

**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.