

# Department of Veterans Affairs

# Memorandum

**Date:** October 22, 2018

**From:** Executive Director, Homeless Program Office (10NC1)

**Subj:** Request for Office of Management Review and Consideration for Emergency Clearance for Case Management Services Program

**To:** Neomi Rao, Administrator, Office of Information and Regulatory Affairs (OIRA)

**CC:** Stephanie Tatham, VA Desk Officer

1. The purpose of this memorandum is for the Department of Veterans Affairs (VA) to request emergency clearance of an information collection under the Paperwork Reduction Act pursuant to 38 CFR 61.90. The title of this information collection is Grant for Case Management Services Program.
2. Section 712 of the Veterans Health Care and Benefits Improvement Act of 2016 (Public Law 114-315) states that the "Secretary shall carry out a program under which the Secretary shall provide case management services to improve the retention of housing by veterans who were previously homeless and transitioning to permanent housing and veterans at risk of becoming homeless." On June 5, 2018, VA published an interim final rule at 83 FR 25915 to amend its regulation to implement the new case management program.
3. Information collection associated with this interim final rule will be used by the Veteran Health Administration (VHA) Homeless Program Office officials in VA Central Office to determine eligibility to receive grant, apply the criteria to rate and rank each grant application. To obtain information necessary to ensure the Federal funds are awarded to applicants who are financially stable and who will conduct the program for which the grant award was made.
4. The information collection for this grant is essential to the mission of the agency and will serve as a key component in the Federal government's efforts to end homelessness among Veterans. To accomplish the goal of ending Veteran homelessness VA must ensure that once formerly homeless Veterans are housed, they have the ongoing supports to maintain this housing. Housing retention is the intent of the statute that authorizes the case management grant. The quick approval of the information collection is essential to expedite the publication of a Notice of Funding Availability (NOFA), the grant selection, award process, and ultimately the implementation of this new service for Veterans.
5. Per 5 CFR 1320.13(a)(2), an executive agency may request an emergency processing of information collection, when the agency cannot reasonably comply with the normal

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clearance procedures under that part because: public harm is reasonably likely to result if normal clearance procedures are followed; an unanticipated event has occurred; or the use of normal clearance procedures is reasonably likely to prevent or disrupt the collection of information or is reasonably likely to cause a statutory or court ordered deadline to be missed.

6. In this case, the use of normal clearance procedures is reasonably likely to prevent or disrupt collection of information and is reasonably likely to cause a statutory deadline to be missed. Public Law 114-315 requires a report to congress by June 1, 2020, regarding an assessment of the case management grant. The VA plans to offer a NOFA this fiscal year, which will not be able to be executed without the information collection. The process of publishing a NOFA, processing a grant round and awarding grants take several months. Without the emergency approval for information collection the statutory deadline requirement for reporting on the case management grant will likely be missed.
7. In addition to not meeting the statutory deadlines of Public Law 114-315, delays in the implementation of the case management grants increases the risk of returning to homelessness for those Veterans who do not have access to this supportive service.
8. VA requests emergency processing of this information collection no later than November 22, 2018. VA has taken steps to consult with other VHA Homeless Program Offices, and field staff in an advisory role to minimize the burden of data collection, while ensuring an effective grant selection and responsible case management service for Veterans.
9. Any questions may be addressed to, Mr. Jeffery L. Quarles, MRC, LICDC, National Director GDP Program, VHA via phone at (813) 979-3570, or by email at [jeffery.quarles@va.gov](mailto:jeffery.quarles@va.gov).
10. Thank you for your consideration in this matter.



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