

**SUPPORTING STATEMENT FOR HOMELESS PROVIDER GRANT AND PER DIEM PROGRAM
VA FORM 10-0361 SERIES, OMB APPROVAL NUMBER 2900-0554**

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 109-461 provided permanent authority for VA's Homeless Providers Grant and Per Diem Program for homeless Veterans. Funds appropriated to the Department of Veterans Affairs (VA) for this program are expected to be significantly less than the total amount requested by applicants. Information must be collected to determine which applicants are eligible, and to prioritize applications for determining who will be awarded funds. VA no longer requires applicants to use a VA Form to respond to the collection of information. Rather, VA requires applicants to respond to the collection of information as published in the Notice of Funding Availability (NOFA) in any standard business format. VA provides the outline for the collection in the NOFA and uses the standard business format collections to evaluate applicants for all the grant programs authorized under the statutory authority for VA to make homeless grants. The information collected remains the same as outlined 38 CFR 61.01-61.82 and was addressed in the Paperwork Reduction Act section of the interim VA Rule 2900-AN-81 published in the *Federal Register* March 1, 2012. Subsequent to public comment the Final Rule was published in the *Federal Register*, February 25, 2013 and has been incorporated into 38 CFR 61.0-61.82. (Authority: 38 U.S.C. 501, 2002, 2011, 2012, 2061, 2064, 7721 note).

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 in effect for over eighteen years and has proved effective. If this data were not collected, VA would not be able to implement the provisions of Public Law 107-95 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 Find and Apply for funding through Grants.gov. The First Submission portion of the application will now be submitted through Grants.gov using existing forms and templates available on Grants.gov. Applicants will be required to follow the instructions provided with the application on Grants.gov in order to properly submit an application. If the provider is conditionally selected for funding they will be asked to complete the Second Submission application package. This portion of the application package may be filled out in any standard business format and hard copies are to be submitted.

Applicants who are not conditionally selected after the First Submission through Grants.gov would no longer incur the burden time of filling out the Second Submission. In the Second Submission application some questions have been removed while others have been combined to encourage applicants to provide succinct responses.

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

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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 only when there is an application for a grant and/or per diem payments.

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 October 7, 2016, page 69903-69904. VA 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.

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.

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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. However, the files are maintained in a secure area. Since these items are filed by the name of the institution and the Veterans are not identifiable by name or number, the forms are not considered to be covered by the Privacy Act.

11. Provide additional justification for any questions of a sensitive nature, 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. At the start of each eligibility period, VA will publish a Notice of Fund Availability (NOFA) in the *Federal Register*. We list below the anticipated response rate and estimated total burden to each NOFA: Burden per respondent is based upon an analysis of past transitional housing grant applications. As the collection of information has not changed only the instrument of collection we anticipate burden to remain the same.

VA Homeless Providers Grant and Per Diem Program. 38 CFR §§ 61.11, 61.15, 61.17, 61.31, 61.41, and 61.51, contains application provisions for capital grants, per diem, special needs grants, and technical assistance grants. The number of respondents in table 2 has increase due to a change in the grant cycle to annually. In addition, the number of respondents in table 3 has decreased as there are only 15 grantees remaining and under this grant authority we currently only offer the grant to those currently having a special need award due to expire. 38 CFR §§ 61.55 and 61.66 contain requirements for compliance reports. 38 CFR §§ 61.62 has requirements under program changes and 61.80 has requirements under general operations. The compliance reports have been changed. VA now provides to the grantee (quarterly) the grantee’s performance status regarding the VA performance metrics. The grantee no longer provides a performance report. The information is now collected by the VA Liaison in existing VA systems through the grantee’s monthly billing invoice information and admission and discharge notifications as reflected in the billing.

**Application provisions for capital grants and per diem.
No form needed may be reported to VA in standard business narrative.**

Need for information & proposed use of information	Determine eligibility for capital grants & per diem	
Likely respondents	Public or nonprofit private entities	
Annual respondents		100
Frequency of annual responses		1
Annual burden hours per collection		35
Annual reporting & recordkeeping burden hours		3,500

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**Application provisions for per diem for non-capital grant recipients.
No form needed may be reported to VA in standard business narrative.**

Need for information & proposed use of information	Determine eligibility for per diem	
Likely respondents	Public or nonprofit private entities	
Annual respondents		650
Frequency of annual responses		1
Annual burden hours per collection		20
Annual reporting & recordkeeping burden hours		13,000

**Application provisions for special needs grants.
No form needed may be reported to VA in standard business narrative.**

Need for information & proposed use of information	Determine eligibility for a special needs grant	
Likely respondents	Public or nonprofit private entities	
Annual respondents		15
Frequency of annual responses		1
Annual burden hours per collection		20
Annual reporting & recordkeeping burden hours		300

**Compliance reports for per diem and special needs grants.
No form needed may be reported to VA in standard business narrative.**

Need for information & proposed use of information	Determine compliance with the requirements of the grant	
Likely respondents	Entities receiving per diem or special needs grants	
Annual respondents		650
Frequency of annual responses		12
Annual burden hours per collection		.25
Annual reporting & recordkeeping burden hours		1,950

**Application provisions for technical assistance grants.
No form needed may be reported to VA in standard business narrative.**

Need for information & proposed use of information	Determine eligibility for a technical assistance grants	
Likely respondents	Entities with expertise in preparing grant applications	
Annual respondents		25
Frequency of annual responses		1
Annual burden hours per collection		10
Annual reporting & recordkeeping burden hours		250

**Compliance reports for technical assistance grants.
No form needed may be reported to VA in standard business narrative.**

Need for information & proposed use of information	Determine compliance with requirements of the grant	
Likely respondents	Entities receiving technical assistance grants	
Annual respondents		10
Frequency of annual responses		4
Annual burden hours per collection		2.25
Annual reporting & recordkeeping burden hours		90

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 VA’s Homeless Providers Grant and Per

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Diem Program. The separate hour burden estimates are listed on the attachment to OMB Form 83-1.

c. Provide estimates of annual cost to respondents for the hour burdens for collections of information.

We estimate the annual cost to respondents will be \$279,668.50. It is estimated that one fourth of the grant proposals will be written on a pro bono basis and the remaining three fourths of the grant proposals will be written by professional grant writers at \$14.65 per hour.

Burden Hours	Cost per hour	Total
19,090	\$14.65	\$279,668.50

May 2016 National Occupational Employment and Wage Estimates United States

https://www.bls.gov/oes/current/oes_nat.htm#31-0000

31-0000	Healthcare Support Occupations	major	4,043,480	0.4%	28.800	\$13.42	\$14.65	\$30,470	0.2%
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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. Architectural/engineering costs ranges from \$0 to \$3,000, depending on whether the services are donated to the non-profit entity seeking a grant and the size of the project for which funding is requested. The cost of grant writing varies depending on whether the services are donated to the nonprofit entity seeking a grant.
- c. There is no an anticipated capital start-up cost component or requests to provide information.

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.

Cost to the Federal Government is estimated at \$265,046. This is broken down by grant program in the attached table:

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COST TO THE FEDERAL GOVERNMENT

VA Form Number	Review Panel	Postage	Design/ Print Forms	Communications	Est. Cost
Grant and Per Diem Capital Grant Standard Business Format	<ul style="list-style-type: none"> •Review, rate, score applications--25 GS –13/5 social workers @ \$44/hr average salary x 40 hours = \$44,000. •Travel-- \$187 x 5 days +Avg. Airfare @ \$1,200. x 25 reviewers = \$52,625 (\$96,625 total) 	All application requirements provided in Notice of Funding Availability.	No printing needed – applicant provides application to VA.	<ul style="list-style-type: none"> •Toll-Free Phone/Fax Inquiry @ \$0.25/ min x 5/min call x 2,000 calls = \$2,500 •Information exchange--GS 13/5 @ \$44/hr ÷ 60 = .75 x 5 min x 2,000 = \$7,500 (\$10,000 total) 	\$106,625
Per Diem Non-capital grant recipients Standard Business Format	<ul style="list-style-type: none"> •Review, rate, score applications--25 GS –13/5 social workers @ \$44/hr average salary x 40 hours = \$44,000. •Travel-- \$187 x 5 days +Avg. Airfare @ \$1,200. x 25 reviewers = \$52,625 (\$96,625 total) 	All application requirements provided in Notice of Funding Availability	No printing needed – applicant provides application to VA.	<ul style="list-style-type: none"> •Toll-Free Phone/Fax Inquiry @ \$0.25/ min x 5/min call x 2,000 calls = \$2,500 •Information exchange--GS 13/5 @ \$44/hr ÷ 60 = .75 x 5 min x 2,000 = \$7,500 (\$10,000 total) 	\$106,625
Special Needs Grant Standard Business Format	<ul style="list-style-type: none"> •Review, rate, score applications--10 GS –13/5 social workers @ \$44/hr average salary x 40 hours = \$17,608 •Travel-- \$187 x 5 days +Avg. Airfare @ \$1,200. x 10 reviewers = \$21,350 (\$38,958 total) 	All application requirements provided in Notice of Funding Availability	No printing needed – applicant provides application to VA.	<ul style="list-style-type: none"> •Toll-Free Phone/Fax Inquiry @ \$0.25/min x 5/min call x 300 calls = \$375 •Information exchange--GS 13/5 @ \$44/hr ÷ 60 = .75 x 5 min x 300 = \$1,125 (\$1,500 total) 	\$40,458
Compliance Reports for Tech. Assistance	<ul style="list-style-type: none"> •No travel- review by VA staff at Tampa •Review compliance reports- 1 GS –13/5 @ \$44/hr x 20 hours = (\$880 total) 	N/A Report sent to VA	N/A Report sent to VA	N/A	\$880
Technical Assistance Grant Standard Business Format	<ul style="list-style-type: none"> •Review, rate, score applications--3 GS –13/5 social workers @ \$44/hr average salary x 24 hours = \$3,168 •Travel-- \$187 x 3 days +Avg. Airfare @ \$1200 x 3 reviewers = \$5,283 (\$8,451 total) 	All application requirements provided in Notice of Funding Availability	No printing needed – applicant provides application to VA.	<ul style="list-style-type: none"> •Phone--Toll-Free Phone/Fax Inquiry @ \$0.25/min x 5/min call x 100 calls = \$125 •Information exchange--GS 13/5 @ \$44/hr ÷ 60 = .75 x 5 min x 100 = \$375 (\$500 total) 	\$9,138
Compliance Reports-Per Diem /Special Needs Standard Business Fomat	<ul style="list-style-type: none"> •No travel- review by VA staff at Tampa •Review compliance reports- 1 GS –13/5 @ \$44/hr x 30 hours = (\$1,320 total) 	N/A Report sent to VA	N/A Report sent to VA	N/A	\$1,320
TOTAL					\$265,046

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15. Explain the reason for any program changes or adjustments in burden hours or respondent burden.

The is not a change in burden hours despite the deletion of the VA Form 10-0361-Series, as the collection of information has not changed only the instrument of collection was changed and we anticipate burden to remain the same. Use of a standard business format has allowed VA to modify the specific collection of information questions to reflect the requirements of current regulatory/statutory changes to those requirements 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.

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.

There are no plans to publish the results of the information collected.

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 in an effort 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.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

No statistical methods are used in this data collection.