

Supporting Statement for Paperwork Reduction Act Submissions
Continuum of Care Homeless Assistance Grant Application- Continuum of Care
Registration
OMB# 2506-0182

Part A Justification

A1 Need and Legal Basis

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

The Continuum of Care Homeless Assistance Grant Application - Continuum of Care Registration (CoC) is the first part of the information collection process used by HUD in the annual competitive homeless assistance program, the CoC program, authorized by the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act). This request, however, is separate from the Continuum of Care Program Application. This separation is necessary due in part to the electronic management system and the fact that the CoC Registration occurs prior to the collection of the CoC Program Application. Additionally, the information collected during CoC Program Registration does not frequently change; therefore, HUD will only need to seek OMB approval every three years, as required by the Paperwork Reduction Act.

CoC Program Registration comprises the first phase of the combined CoC Program information collection form. During this phase, HUD collects the contact information of the CoC designated Collaborative Applicant, Homeless Management Information System (HMIS) Lead, and Homeless Resource Contact Person, as well as the geographic areas claimed by each CoC. Collaborative Applicant approve the preliminary pro-rata need and affirm their Annual Renewal Demand (ARD) which is the sum of all eligible renewal projects within the CoC's geographic area. If a Collaborative Applicant chooses to apply for Unified Funding Agency (UFA) designation, HUD will collect information regarding the CoC's board structure and the capacity of the CoC to carry out the various activities outlined in 24 CFR 578.11. Further, if a Collaborative Applicant, at the request of the CoC applies for High Performing Community Designation (HPC), the Collaborative Applicant will complete additional information that should demonstrate it meets the requirements of subpart E as outlined in 24 CFR part 578. The registration information is necessary to assist in the selection of proposals submitted to HUD (by State and local governments, public housing authorities, and nonprofit organizations) for the awarded funds under the CoC Consolidated Application.

The regulatory authority to collect this information is contained in the CoC Program interim rule and the HEARTH Act.

Selection of applications for funding under CoC Program is based on rating factors listed in the Notice of Funding Availability (NOFA), which is published each year to announce the CoC Program funding round.

A2 Information Users

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

All Collaborative Applicants will be required to register their CoCs in the *e-snaps* electronic grants management system prior to the opening of the CoC Program Competition. The registration requirements include a basic description of the CoC's Collaborative Applicant, contact information, and geographic area claimed by the CoC. The information to be collected by HUD will be used to rate applications, determine eligibility for the CoC Program Competition, and establish each CoC's ARD. In tandem, Collaborative Applicants will also list their CoC's eligible renewal projects on a Grant Inventory Worksheet (GIW) (see attachment) that will allow HUD to accurately assess individual project applications during the CoC Program Application process.

The GIW is pre-populated with the basic project information for all projects that are eligible for renewal funding in the coming Competition, including the current grants' budget details. Respondents must verify that the information on the GIW is accurate, estimate the funds that will be requested for each grant in the CoC Homeless Assistance competition, and list any additional program changes. For the majority of listed projects, the information entered on this Grant Inventory Worksheet Form will be a copy of the information pre-populated on the form that represents the current grant's project information. The information from the GIW is essential for operation of the CoC Program Competition. Most importantly, the budget information provided on the GIW will be used to estimate the national ARD, which will in turn determine resource allocation. The program details, verified by the Collaborative Applicant, will also allow HUD to conduct an accurate assessment of renewal project applications at the completion of the application phase of the competition.

Collaborative Applicants that have recently been part of a merger between two or more CoCs have the option of filling out a CoC Merger Worksheet. The Worksheet is designed to help communities understand the Final Pro-Rata Need that will be available to a merged CoC during the coming fiscal year. Merging CoCs may complete these calculations independently from the worksheet, however the tool is a useful aid that HUD believes dramatically simplifies the process for grantees and reduces reporting burden. This tool is not required by HUD and, when used, does not have to be returned to HUD. HUD estimates that a very small percentage of CoCs will merge in a given year.

To meet the performance goals established by statute, CoCs will need to significantly increase their capacity for strategy, planning, monitoring, and evaluation.

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.

This collection of information is electronic. The electronic registration process is designed to lessen reporting burden on applicants by preventing duplication within Homeless Assistance application and reporting tools. HUD adapted *e-snaps*, an existing electronic grants management system for the current CoC Homeless Assistance Application, to streamline the application process and lessen reporting burden on applicants. Potential applicants are able to log into a database driven website and type the required information. If the potential applicant is a returning entity from the previous year's application process, the applicant will be able to retrieve the information collected from the previous year's competition and update information as needed.

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 application has been streamlined, with each data element collected only once, stored in a database, and placed in all appropriate sections of the application. Applicable information entered during CoC Program Registration will be imported to the currently approved CoC Consolidated application. For CoC's that applied in the previous year's competition, information that remains the same from competition to competition will be stored in the database and may be utilized by applicants in the next year's competition.

The CoC model is only used by the CoC Program; therefore, information from other HUD programs is not relevant to the data collected during CoC Registration.

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 wide-range of applicants for CoC funding (including nonprofit organizations, States, local governments, instrumentalities of State and local governments, and public housing agencies as such term is defined in 24 CFR 5.100) and 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 will 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.

All information collected is used to carefully to consider applications for funding. If HUD collects less information, or collects less frequently, the Department will not be able to determine the eligibility of applicants for grant funds and applicants will not be eligible to receive funding for the fiscal year.

A7 Special Circumstances

Explain any special circumstances that would cause an information collection to be conducted in a manner that would impose additional workload burden on recipients (see eight items listed in OMB guidance).

This information is being collected in a manner consistent with the guidelines in 5CFR 1320.6. There are not special circumstances that would cause an information collection to be conducted in a manner:

- response more than quarterly – NA
- response in fewer than 30 days – NA
- more than an original and two copies of any document – NA
- retain records for more than three years (other than health, medical, government contract, grant-in-aid, or tax records) – NA
- statistical surveys not designed to produce results than can be generalized to the universe of study – NA
- statistical data classification not been approved by OMB – NA
- a pledge of confidentiality that is not supported by statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use – NA
- respondents to submit proprietary trade secret, or other confidential information - NA

A8 Federal Register Notice/Outside Consultation

Identify the date and page number of the Federal Register notice (and provide a copy) soliciting comments on the information. Summarize public comments and describe actions taken by the agency in response to these comments. Describe all efforts to consult with persons outside the agency.

In accordance with the Paperwork Reduction Act of 1995, the Department of Housing and Urban Development published a notice in the Federal Register on July 11, 2017, pages 32008, vol 82, HUD received no comments.

A9 Payment/Gift to Respondents

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

No payment or gift to respondents is allowed.

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 involved.

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.

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.

Exhibit A-1 below demonstrates how the public burden for the CoC Homeless Assistance Application Registration, the beginning of HUD-40090-1 (CoC Application) and included in the CoC Program interim rule § 578.9 CoC application for funds, was calculated. Approximately 450 CoCs, covering every geographic area of almost every state, will submit this form, including the GIW. Estimates of public burden have been derived through program staff experience and input from previous applicants regarding the time it takes to verify the GIW and update all relevant Registration forms. The CoC Merger Worksheet referenced in question 2 above, is optional, and filled out by very few respondents, and so has a negligible overall impact on the average burden per applicant.

Exhibit A-1: Estimated Annual Burden Hours for CoC Registration

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
CoC Registration Process - Basic	410.00	1.00	410.00	2.00	820.00	\$39.00	\$31,980.00
CoC Registration Process - UFA	25.00	1.00	25.00	15.00	375.00	\$39.00	\$14,625.00
CoC Registration - HPC	5.00	1.00	5.00	10.00	50.00	\$39.00	\$1,950.00
Subtotal	410.00	1.00			1,245.00		
Total Grant Program Application Collection	410.00	1.00			1,245.00	\$39.00	\$48,555.00

The decrease for basic registration is due to the lower number of CoCs due to mergers over the past couple of years. The overall increase for the collection is based on Collaborative Applicants requesting designation as a UFA and/or HPC which will require additional information to ensure the Collaborative Applicant and CoC meets all statutory and regulatory requirements to carry out the activities under each type of designation. However, our office is still confident in our estimate that for the vast majority of applicants, the completion of the relevant forms for registration will take about 1 hour. For these applicants, the process is a familiar verification of information that is largely pre-populated by our staff for their convenience.

A13 Capital Costs

Estimate the annual capital cost to respondents or record keepers.

There are no additional costs to the respondents.

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):

Registration Review: 410 CoCs x 1 hour per year x \$39*

Total cost to the Federal Government: \$15,990

*this figure is based on a GS-12 salary

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB_h.pdf

We expect that the number of respondents will remain the same or decrease slightly each year due to CoC mergers. The cost to specific government employees may increase if respondents under their review apply as UFAs and/or HPCs, as these type of proposed applicant will be required to answer additional questions. However, it is HUDs determination, through staff experience and expertise that fewer than 10 (to date only 7 UFAs have been designated since FY 2012) applicants come close enough to the requirements to be able to apply as a UFA and to date no CoCs have applied for HPC designation.

A15 Program or Burden Changes

Explain any program changes or adjustments in burden.

The collection of information will incorporate UFA and HPC data elements reflective of the changes implemented under the HEARTH Act and the CoC Program interim rule. The burden hours per respondent were increased with the addition of UFA and HPC information to the registration process and to allow HUD to determine if applying respondents are eligible for UFA and/or HPC designations. As stated above, HUD believes that very few CoCs will apply, and so nationally, the impact on burden will be minimal.

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 information collection.

A18 Certification Statement

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

There are no exceptions to the signed certification