

VHA Homeless Programs
Project CHALENG (Community Homelessness Assessment, Local Education and Networking
Groups) for Veterans Needs Assessment OMB Request
2900-0843

A. JUSTIFICATION

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

In 1993 the Department of Veterans Affairs (VA) launched Project CHALENG (Community Homelessness Assessment, Local Education and Networking Groups) for Veterans in response to Public Law 102-405 which required VA to make an assessment of the needs of homeless Veterans in coordination with other Federal departments, state and local government agencies, and nongovernmental agencies with experience working with homeless persons. Since 1993, VA has administered a needs assessment in accordance with guidance in Public Law 103-446 and Public Law 105-114.

This collection of information is necessary to ensure that VA and community partners are developing services that are responsive to the needs of local homeless Veterans, in order to end homelessness and prevent new Veterans from experiencing homelessness. Over the years, data from CHALENG has assisted VA in developing new services for Veterans such as the Homeless Veteran Dental Program (HVDP), the expansion of the Department of Housing and Urban Development-VA Supportive Housing (HUD-VASH) Program, the Veterans Justice Programs and Supportive Services for Veteran Families (SSVF). In addition community organizations use CHALENG data in grant applications to support services for homeless Veterans; grant applications are for VA, other Federal, local government, and community foundation dollars, which maximize community participation in serving homeless Veterans.

This collection will be an update of a collection approved in 2016. Revisions to the collection were made based on input provided by VA staff members, Congressional stakeholders, and a public listening session that was co-sponsored by National Coalition for Homeless Veterans, American Bar Association, and U.S. Department of Justice-Legal Aid Interagency Roundtable.

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.

As required in the Public Law, the information is to be used by VA to plan services that meet the needs of homeless Veterans. In previous years, data from CHALENG have been used to develop the Homeless Veterans Dental Program, the Supportive Services for Veteran Families Program, the Veterans Justice Programs and to expand the U.S. Housing and Urban Development-VA Supported Housing (HUD-VASH) Program.

In addition community organizations use CHALENG data in grant applications to support services for homeless Veterans; grant applications are for VA, other Federal, local government, and community foundation dollars, which maximizes community participation in serving homeless Veterans.

Data from the proposed 2019 collection will be provided through a public Fact Sheet and presentations at national conferences. It will also be distributed among VA Homeless Programs at the national, VISN, and VHA medical center level to assist in refining existing programs or developing new programs.

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.

In 2012, CHALENG collection converted from a pencil and paper needs assessment to an online needs assessment hosted through the SurveyGizmo platform, with the link placed on the VA Homeless Programs website. This decision was made in consultation with the VA VISN Network Homeless Coordinators, who had been coordinating paper needs assessments in previous years and concurred that converting to an online format would maximize Veteran input. At VHA medical center sites that prefer paper assessments or that do not offer free computer and internet services to Veterans, that option is available. Paper needs assessments are also available to the general public by request for individuals who prefer not to use the online interface. The proposed 2019 online collection will be transitioned from SurveyGizmo to Survey Monkey, and will also be available on paper.

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.

No other area of VA conducts an assessment of the needs of homeless Veterans. Congress specifically required this data collection to ensure that services for homeless Veterans are planned according to an assessment of Veterans' needs. There is not any similar information already available that could be used to meet this purpose.

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

No small businesses or other small entities are impacted by this information collection.

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.

The consequences if the information were not collected would be that VA would not have a mechanism to determine if needs among homeless Veterans are changing over time, and therefore could not plan for new services to meet newly unmet needs or adjust strategies and services for needs that were previously rated as "met" and change to "unmet." Not collecting information via the CHALENG needs assessment would also silence the voice of community partners in communicating their view of Veterans' met and unmet needs, as well as removing a vehicle for Veterans to directly express their view of met and unmet needs. VA would not be compliant with Public Law 103-446 and Public Law 105-114, which requires VA to collect this information to plan services that meet the needs of homeless Veterans.

There are no known technical or legal obstacles to reducing burden; the collection is offered in both online and paper and pencil formats to maximize ease of use.

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 March 23, 2018 (Volume 83, Number 12847, Pages 12847-12848). 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.

Outside consultation was received via a public listening session that was co-sponsored by National Coalition for Homeless Veterans, American Bar Association, and U.S. Department of Justice-Legal Aid Interagency Round Table on June 2, 2017. There are no circumstances that preclude consultation every three years.

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 offered 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.

The collection is anonymous; Public Laws 102-405, 103-446, 105-114 do not require respondents to identify themselves.

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 included in this collection.

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

Number of respondents: over the past five years, CHALENG has averaged approximately 9,700 respondents per year.

Frequency of response: annual, with a one-time response per year.

How burden was estimated: consultation with fewer than 10 colleagues. The average amount of time to complete the needs assessment is 6 minutes for the Veteran assessment, and 9 minutes for the provider assessment.

Reason for variance: the Veteran assessment asks the Veteran to rate needs based on their own experience; the Provider assessment asks providers to rate needs for both male and female Veterans.

Veteran assessment: $5,000 \text{ Veterans} \times 1 \text{ assessment/year} \times 6 \text{ minutes/assessment} = 500 \text{ hours}$

Provider assessment: $4,700 \text{ providers} \times 1 \text{ assessment/year} \times 9 \text{ minutes/assessment} = 705 \text{ hours}$

Total hour burden: $\text{Veteran (500 hours)} + \text{Provider (705 hours)} = 1,205 \text{ hours}$

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.

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Total hour burden: $\text{Veteran (500 hours)} + \text{Provider (705 hours)} = 1,205 \text{ hours}$

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 of the OMB 83-I.

The cost to respondents is calculated using time value for the providers who respond to the CHALENG survey. Providers who respond to the survey provide services to homeless Veterans in the community. These are primarily social service personnel, who provide homeless services such as street outreach, emergency shelter, transitional housing, and crisis resources such as emergency food. These homeless service providers primarily work for non-profit homeless service agencies, and provide services directly in the community, usually in deeply impoverished neighborhoods.

Community providers who respond to the survey are identified by VA homeless program staff, who request their feedback on the CHALENG needs assessment during community planning meetings organized to most appropriately design and deliver services to homeless veterans in the community.

The BLS category that seems most appropriate to describe homeless social service providers is 21-1093: Social and Human Service Assistants: Assist in providing client services in a wide variety of fields, such as psychology, rehabilitation, or social work, including support for families. May assist social workers with developing, organizing, and conducting programs to prevent and resolve problems relevant to substance abuse, human relationships, rehabilitation, or dependent care.

The median hourly wage is \$15.92 hourly wage for BLS category 21-1093 and the mean hourly wage is \$17.05. Calculated at the estimated hours of 705 for provider surveys this would be an annual cost estimate of \$11,223.60-\$12,020.25. Updates to include the latest hourly wages, as published here: <https://www.bls.gov/oes/2017/may/oes211093.htm>

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

There will be no costs to respondents or record keepers.

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 to the Federal Government of supporting CHALENG is \$83,299. The cost is to support the 0.5 FTEE in the VA Homeless Programs that is allocated to support collection of information, analysis of data, distribution of data, and responding to public inquiries regarding CHALENG. The position is a GS-14, step 5, and cost reflects locality pay plus benefits. See <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/LA.aspx>

15. Explain the reason for any burden hour changes since the last submission.

Based on input received from the public listening session co-sponsored by National Coalition for Homeless Veterans, American Bar Association, and U.S. Department of Justice-Legal Aid Interagency Round Table, VHA added eight new items to collection. Based on input received from internal stakeholders, VHA changed two items. Based on input from congressional stakeholders, VHA added a free text item to the Veteran collection. Combined, these changes will add one minute to each collection. Although the per collection time is increased, over the past two years we have had declining numbers of respondents to the collection and anticipate that lower response rate will stay consistent. Therefore the overall time burden is reduced since the last submission to reflect lower average number of respondents.

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.

Information from CHALENG is shared with the public via a Fact Sheet posted on the VA Homeless Programs website. CHALENG information is provided via tabulation of frequencies of responses and no complex analytical techniques are used.

Time schedule for entire project:

Begin collection of information: January 1, 2019

End collection of information: December 31, 2019

Analyze information: January 1, 2020 – March 31, 2020

Obtain clearance: April 1 – 30, 2020

Post Fact Sheet on website: May 1, 2020

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

There are no requests for approval to omit the expiration date for the OMB approval of the information collection.

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.