

**Supporting Statement for Paperwork Reduction Act Submissions**  
**Continuum of Care Program Application**  
**OMB 2506-0112**

**Introduction**

The Continuum of Care (CoC) Program is authorized by subtitle C of title IV of the McKinney-Vento Homeless Assistance Act, (42 U.S.C. 11381-11389 (the Act), and 24 CFR part 578 [Docket No. FR-5476-I-01]. This PRA justification covers the requirements for the CoC Program Application, also called the CoC Consolidated Application that includes the CoC Application, the Priority Listing and project applications that have been either accepted and ranked or rejected as part of the annual CoC Program Competition.

**A1 Need and Legal Basis**

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

The regulatory authority to collect this information is contained in 24 CFR Part 578, and is authorized by the McKinney-Vento Act (Homeless Assistance) (42 U.S.C. 11371 et seq.) which states that “The Secretary shall award grants, on a competitive basis, and using the selection criteria described in section 427, to carry out eligible activities under this subtitle for projects that meet the program requirements under section 426, either by directly awarding funds to project sponsors or by awarding funds to unified funding agencies.”(SEC.422(a))

The CoC Program Application (OMB 2506-0112) is the second part of the information collection process to be used in HUD’s CoC Program Competition authorized by the Act. The first part is the annual CoC Program Registration and is covered under the approved PRA package 2506-0182. This separation is necessary as the CoC Program Registration occurs several months before collection of the CoC Program Application and the information collected during CoC Registration does not frequently change, while the CoC Program Application changes often to accommodate new policy priorities, annual appropriations language, and new research. The third part of the CoC Program Competition process is the CoC Program Application – Technical Submission and is covered under the approved PRA package 2506-0183. The CoC Technical Submission covers the grant post- award process, including the processing of grant agreements and amendments. Like with the Registration package, this separation is necessary because it occurs several months after the submission of the CoC Consolidated Applications.

The CoC Application (OMB 2506-0112), also called the ***CoC Consolidated Application***, includes a CoC Application, CoC Project Listing, and project applications that have been either accepted and ranked or rejected. The CoC Application and CoC Priority Listing collects information from CoCs, and a project application collects information from the individual organizations within those CoCs with each CoC determining which project applications are submitted to HUD by accepting and ranking or rejecting each project application on the CoC Priority Listing. The CoC Consolidated Application is necessary for the selection of proposals submitted to HUD (by nonprofit organizations, states, local governments, and instrumentalities

of state and local governments, and Public Housing Agencies) for the grant funds available through the CoC Program.

The purpose of this information collection is to determine each CoC's progress towards: 1) promoting community-wide commitment to the goal of ending homelessness, including homelessness among the specific subpopulations of the chronically homeless, families, youth and Veterans; 2) provide funding for efforts by nonprofit providers and State and local governments to quickly re-house homeless individuals and families into permanent housing while minimizing the trauma and dislocation caused to individuals, families, and communities by homelessness; and 3) promote access to, and effective utilization of mainstream programs and programs funded with State or local resources in order to increase self-sufficiency among individuals and families experiencing homelessness. The information also allows HUD to assess project quality according to the threshold criteria established annually by the CoC Program Competition Notice of Funding Availability (NOFA) and according to the Act, and 24 CFR part 578.

## **A2 Information Users**

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

The entirety of the information collected in the CoC Consolidated Application is through an electronic system called *e-snaps*. There are three parts of the CoC Consolidated Application: the CoC Application, the CoC Priority Listing, and the project application. Project applicants are organizations that submit project applications to the CoC for review in the local competition. Each CoC has a designated Collaborative Applicant that submits the CoC Application and CoC Priority Listing that includes all project applications that have been either accepted and ranked or rejected in the local competitions as a package to HUD – the CoC Consolidated Application. All parts of the CoC Consolidated Application are completed simultaneously throughout the Competition period. Portions of the CoC Application are dependent on the CoC's review of information submitted in the project applications, but much of the CoC Application can be completed independently. Similarly, the Collaborative Applicant, who is designated by the CoC to complete and submit the CoC Consolidated Application, can only complete the rankings on the Priority Listing in the electronic *e-snaps* system after all the project applications are submitted; however, the CoC can make decisions about how to rank project applications at any time during the local competition period.

### ***CoC Application***

The CoC Application serves as the backbone of the CoC Consolidated Application. It includes questions regarding the community's past performance and future plans for reducing homelessness, meeting the housing and related service needs of homeless individuals and families, performance data to measure progress towards ending homelessness, and the CoC's processes and procedures for conducting an open, inclusive, and research informed CoC local competition. HUD uses this information to rate each CoC with a score based on statutory, regulatory, and NOFA requirements and the score is compared both to a minimum threshold and to the scores of all other CoCs. This in turn will affect the number of project applications that are funded within each CoC.

In FY 2018, 400 CoCs are expected to submit a CoC Consolidated Application. These 400 CoCs will oversee an expected total of around 8,000 awarded projects. CoCs range in size from small (one or two CoC Program funded projects) to large (over 200 CoC Program funded projects). The CoC Consolidated Application is used to objectively rank CoCs, regardless of size, and determine the extent of funding awards.

### ***Project applications***

The project applications are completed by project applicants, who include nonprofit organizations, states, local governments, instrumentalities of state and local governments, and Public Housing Agencies. There are four primary types of Project applications: renewal, new, CoC planning and UFA Costs projects.

Project applicants for new and renewal projects may receive CoC Program grant to provide permanent housing (PH), transitional housing (TH), or supportive services only (SSO) to individuals and families that are homeless or to develop and maintain a coordinated entry process, or to fund a CoC's Homelessness Management Information Systems (HMIS) or comparable database for victim service providers. The project application collects information on the scope of the project, the population(s) and subpopulation(s) served, the number of beds and units, and the budget line items for the project. This information is necessary for HUD to determine if the project meets eligibility and quality threshold criteria for CoC Program funds through the CoC Program Competition. While the renewal and new project applications are largely the same, the new project applications include additional fields designed to compensate for the lack of project history and allow HUD to conduct a sufficiently comparative application assessment such as financial capacity and experience in working with homeless individuals and families.

In FY 2018 HUD expects to have approximately 4,167 project applicants applying for 8,050 new and renewal projects. Many project applicants have multiple projects, thus the difference in the numbers. The majority of project applications will be for renewal CoC Program-funded projects (approximately 7,200). In FY 2018, due to an expansion of the types of new Project applications allowed (as described in the FY 2018 Notice of Funding Availability (NOFA)), HUD estimates that there will be 850 project applications for new CoC Program-funded projects.

In addition to the new and renewal project applications for projects providing direct services to individuals and families who are homeless, each Collaborative Applicant designated by the CoC is eligible to apply for a CoC planning grant. By submitting a CoC planning project application CoC's can request funding that will support local planning, needs assessment, and systems coordination designed to improve CoC operations and help the CoC meet the statutory and regulatory requirements established by the Act and 24 CFR part 578. In FY 2018 HUD anticipates that all 400 CoCs will submit a CoC planning project application.

The UFA Costs Project application is the fourth and final type of project application. The Act and 24 CFR part 578 allow HUD to designate Collaborative Applicants as United Funding Agencies (UFAs), which requires a significant change to the structure of the Collaborative Applicant and the relationship between HUD and recipients. The process through which a

Collaborative Applicant applies for and is designated as a UFA is described in the CoC Registration PRA package 2506-0182. During the CoC Program Registration process, the Collaborative Applicant must demonstrate to HUD that they have strong operational capacity, a high functioning CoC Board and the necessary fiscal policies and procedures to qualify. Only a Collaborative Applicant(s) that HUD designated as a UFA through the CoC Program registration process is eligible to apply for a UFA Costs project application. By submitting a UFA Costs project application, a UFA designated Collaborative Applicant can request funds related to operating as a UFA designated Collaborative Applicant, including the monitoring and evaluation of sub recipients. HUD expects six designated Collaborative Applicants to submit UFA Cost project applications in FY 2018 and anticipates that this number will increase in subsequent CoC Program Competitions.

### ***CoC Priority Listing and Reallocation Forms***

Each Collaborative Applicant must submit a CoC Priority Listing, that includes reallocation forms, to complete the CoC Consolidated Application. The CoC Priority Listing is used to allow the CoC to communicate to HUD the rank order in which it would like HUD to prioritize funding for the community's project applications. HUD uses this rank order to determine the project applications that will receive conditional awards based on the amount of funding available in the CoC Program Competition NOFA. The specific details on how the rank order is incorporated into the calculation for funding is included in the annual CoC Program Competition NOFA.

Once all project applications have been submitted in *e-snaps*, the CoC must review the project applications and rank them based on the community's needs and values, listing them from highest (most important) to lowest (least important) on the CoC Project Listing that is submitted in *e-snaps*. The reallocation forms are a part of the CoC Project Listing in *e-snaps* and are used by the CoC to identify funds from eligible renewal projects that will be used to create new projects as outlined in the CoC Program Competition NOFA. The CoC can reduce or eliminate any number of renewal projects and uses the reallocation forms to identify the eligible renewal projects that will be reduced or eliminated to create a new project application. The reallocation forms collect the eligible renewal project name, expiring grant number, project component, amount of funds will be reduced or eliminated, and the reason the eligible renewal project is being reduced or eliminated through the reallocation process. The Collaborative Applicant also records the new project information on the reallocation forms that includes name and new project component and the amount requested through the new project application. The final form for reallocation automatically totals the amount of eligible renewal project amounts that are being reallocated and the amount of funds being requested for new project applications to notify the Collaborative Applicant that the reallocation process balanced, meaning no eligible funds were left.

The information provided in the CoC Priority Listing is fundamental for HUD's ability to make conditional award determinations based on the CoC's local decisions for project funding priorities.

### **Other Forms**

The remaining forms required for the submission of the CoC Consolidated Application are required by the CoC Program or the Department. With the exception of the HUD-2991- Certification of Consistency with Consolidated Plan, which is completed and submitted by the Collaborative Applicant, all the other Department required forms are completed and submitted by the project applicants/recipients. These forms include the HUD-2880- Applicant/Recipient Disclosure/Update Report (2510-0011), SF-424- Application for Federal Assistance, OMB-SF-LLL-Disclosure of Lobbying Activities (where applicable), HUD-40090-4 Applicant Certification, 2 CFR part 200, HUD-50070 – Certification for a Drug-Free Workplace and Certification of Lobbying.

### **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 via *e-snaps*, an existing electronic grants management system for the current CoC Program application. The electronic *e-snaps* application process streamlines the application and lessens the reporting burden on applicants. Applicants are able to log into a database driven website and type the required information. If the applicant is a renewing an existing grant from the previous year's application process, the applicant can retrieve the information collected from the previous year's Competition and update information only as needed, reducing the time required for application completion. All "Other Forms" described in response to the previous question are either uploaded to the *e-snaps* system by the Collaborative Applicant or completed electronically as part of the application.

### **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 the appropriate sections of the application. Applicable information entered during CoC Program Registration (OMB 2506-0182) and project information stored from previous years' applications are imported to the CoC Consolidated Application through the *e-snaps* system, reducing the amount of information reentered from year to year. In addition, applicable information from the CoC Consolidated Application will be imported and used in the CoC Program Application - Technical Submission (OMB 2506-0183), the final part of a three-part process, to complete grant agreements.

The CoC model is applicable only to the CoC Program; therefore, information from other HUD programs is not relevant to the data collected during CoC Program Registration, CoC Consolidated Application, or Technical Submission. HUD has made every effort to bring information forward from previous years' applications, and thus limit duplication; however, some of the information collected is prospective or reliant on current data sets. This new

information is always program specific and asks only for information that is not captured in any other federal database.

#### **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 Program funding (nonprofit organizations, states, local governments, and instrumentalities of state and local governments, and Public Housing Authorities) 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 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, determine project and CoC quality, or incorporate local needs and priorities, 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).*

- requiring respondents to report information to the agency more than quarterly; **does not apply**
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; **does not apply**
- requiring respondents to submit more than an original and two copies of any document; **does not apply**
- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years; **does not apply**
- in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study; **does not apply**
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB; **does not apply**
- that includes a pledge of confidentiality that is not supported by authority established in 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; or **does not apply**

- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law. **Does not apply**

This information is being collected in a manner consistent with the guidelines in 5 CFR 1320.6. There are no special circumstances.

#### **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.*

HUD published a notice describing the Paperwork Reduction Act Submission in the *Federal Register* on September 14, 2018, for 60 days, vol 83 page 46748. No comments were received.

#### **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.*

Privacy analysis and Impact Assessment has been done. No assurances of confidentiality are offered.

#### **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 demonstrate the public burden for the CoC Consolidated Application. Approximately 400 CoCs, covering every state and U.S. territory, will submit this form. The number of respondents has been determined based on information provided in the actual FY 2018 CoC Program Registration process that provides information on the number of CoCs that plan to apply in FY 2018, and the number of renewal project applications and applicants that intend to apply in FY2018. Estimates of public burden have been derived through program staff experience and input from previous applicants.

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

A	B	C	D	E	F	G	F
Submission Documents	Number of Respondents	Frequency of Responses	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
<b><u>CoC Applications</u></b>							
CoC HIC Process (this row includes the Subpopulation Extrapolation Tool, Stratified Extrapolation Tool, Housing Inventory Chart, and a General Extrapolation Tool)	390.00	1.00	390.00	8.00	3,120.00	46.62	145,454.40
CoC PIT Process	390.00	1.00	390.00	8.00	3,120.00	46.62	145,454.40
CoC Application	390.00	1.00	390.00	50.00	19,500.00	46.62	90,090.00
CoC Priority Listing and Reallocation Forms	390.00	1.00	390.00	8.00	3,120.00	46.62	145,454.40
HUD-2991-Cert of Consistency with Consolidated Plan	390.00	1.00	390.00	3.00	1,170.00	46.62	54,545.40
<b>Subtotal CoC Application Submissions</b>	<b>390.00</b>	<b>1.00</b>	<b>390.00</b>	<b>77.00</b>	<b>3,030.00</b>	<b>46.62</b>	<b>1,399,998.60</b>
<b><u>Project applications</u></b>							
Renewal Project applications	<b>7,200.00</b>	1.00	7,200.00	0.50	3,600.00	46.62	167,832.00



New Project applications	<b>850.00</b>	1.00	850.00	1.50	1,275.00	46.62	59,5440.50
CoC Planning Applications	<b>390.00</b>	1.00	390.00	1.00	390.00	46.62	18,181.80
UFA Costs Applications	<b>10.00</b>	1.00	10.00	0.50	5.00	46.62	233.10
<b>Subtotal of Project applications Submissions (Renewal, New, UFA and Planning)</b>	<b>8,450.00</b>	1.00	<b>8,450.00</b>	3.50	5,270.00	46.62	<b>245,687.40</b>
<b>Overall Total CoC Consolidated Application (Total Project applications plus CoC Applications)</b>	<b>8,840.00</b>	1.00	<b>8,840.00</b>	80.80	35,300.00	46.62	<b>1,645,686.00</b>

Please note that all fields with 0.02 hours, roughly one minute, simply require a signature. Respondents' average annualized cost: \$22/hour x 201,779.87 = \$4,439,157.14

### A13 Capital Costs

*Estimate the annual capital cost to respondents or record keepers.*

There are no additional costs to 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):

Review each CoC Application (\$46.46* per hr. x 1.5 hrs. x 814**)	\$56,727.66
Review each Project application (\$46.46 per hr. x 0.25 hrs. x 8,462)	\$98,243.82
Notification of awards to applicants (\$46.46 per hr. x .5 hrs. x 4,574)	\$106,254.02
<b>Total</b>	<b>\$261,225.50</b>

\*this figure is based on a GS-13 salary from 2018 General Schedule (GS) Locality Pay Tables

\*\* The number of CoCs is doubled to reflect the need for two reviewers of each application.

### A15 Program or Burden Changes

*Explain any program changes or adjustments in burden.*

At 35,300 hours, there is an overall decrease in the number of burden hours from the most recently approved PRA package (316,347 hours). For most requirements, with the notable exceptions of the completion of new project applications and the CoC planning project applications, the burden hours were reduced.

In the case of the CoC Application, the reductions are the result of the smaller number of CoCs that are expected to apply due to CoC mergers that have occurred since the last PRA review (390 versus 410 in 2012). Time is also reduced slightly on account of the CoC Priority Listing now being broken out from the CoC Application making it easier for Collaborative Applicants to understand the process for reallocating funds from renewal to new projects and for reviewing and ranking all of the project applications they will submit to HUD. The estimated time per applicant needed to complete the HUD-2991 form was increased to more accurately reflect the amount of time it takes to complete this form; however, the total burden time for the HUD-2991 form decreased because the number of respondents was changed to reflect the form's submission by the CoC.

There were several changes to the number of burden hours for the project applications. The renewal project application burden hours, the largest contributing factor to the project application burden, decreased significantly due to the added functionality of bringing forward information from previous applications. The new project applications burden hours increased significantly due to the increased opportunity for new projects to apply in the FY 2018 CoC Program Competition, which will result in greater number of applicants submitting new project applications. Individual new project applications have historically required more time to prepare than renewal project applications due to the incorporation of unique questions that describe new projects in greater detail; however, the overall burden for new project applications is significantly lower than the burden for renewal project applications because renewal project applications are far more numerous. Finally, CoC planning project applications are estimated at a higher number of hours per response, and the expected number of UFA Costs project applications received has been decreased to accurately reflect HUD's recent experience with the number of applicants.

The overall table was updated to accurately reflect the unduplicated total number of respondents, which was calculated by adding the total number of CoC Applications with the total number of project applications. The number of UFA Costs project applications was also changed to reflect actual recent experience in the number respondents.

#### **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.*

No exceptions.