

## **Part A: Supporting Statement**

# **Continuum of Care Program Homeless Assistance Application—Technical Submission**

OMB Number: 2506-0183

**Supporting Statement for Paperwork Reduction Act Submissions**  
**Continuum of Care Program Homeless Assistance Application—Technical Submission**  
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**A. Justification**

1. *Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.*

This request is for a revision of a currently approved information collection form for use in HUD's competitive homeless assistance programs authorized by the McKinney-Vento Act, as amended. **This request only changes the government cost burden to account for the change in government salaries since the time of the last OMB approval.**

The *Continuum of Care (CoC) Program Homeless Assistance Application—Technical Submission* (Technical Submission) is closely connected to, but separate from the information collection package 2506-0112, the CoC Program Homeless Assistance Grant Application. It is necessary to separate this part of the package from 2506-0112 because Technical Submission occurs several months after the CoC Program Application process. Also, the information collected during Technical Submission does not frequently change; therefore, HUD will only need to seek OMB approval every three years, as required by the Paperwork Reduction Act.

The CoC Program Homeless Assistance Grant Application has three phases, and the *CoC Program Homeless Assistance Application—Technical Submissions* is the final phase. A new applicant that is successful in the first two phases and conditionally awarded under the CoC Program must complete the third phase by providing more detailed technical information not contained in the original application. The Technical Submission forms contain all of the information HUD requires for the third (and final) phase prior to grant agreement execution.

The regulatory authority to collect this information is contained in the CoC Program interim rule. 24 CFR Part 578.21(c) requires that "all issues and conditions attached to an award must be completed within the time frame established in the NOFA. Proof of site control, match, environmental review, and the documentation of financial feasibility must be completed within 12 months of the announcement of the award, or 24 months in the case of funds for acquisition, rehabilitation, or new construction." The Technical Submission is the vehicle by which these actions are completed, while also offering a platform for grant recipients to initiate application amendments.

The Technical Submission is fully electronic and attached to our grants management system, *e-snaps*. By including the Technical Submission in *e-snaps*, grant recipients import all of their applicant profile and project application information, which significantly reduces the amount of time needed to complete the process. For the majority of grantees, the majority of this information does not change between the time of application and the time of Technical Submission. By keeping Technical Submission in *e-snaps*, grant recipients use a familiar data system, ensuring that all changes are maintained and incorporated into future system interactions, and thereby reducing future reporting burden.

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

The program statute can be found at Subtitle C of Title IV, Section 426, Stewart B. McKinney Homeless Assistance Act, as amended by the HEARTH Act. Program regulations can be found at 24 CFR part 578.

2. *Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.*

Applicants who are successful in the Continuum of Care Program Homeless Assistance Grant competition are required to submit more detailed technical information. The information to be collected will be used to ensure that technical requirements are met prior to execution of a grant agreement. The technical requirements relate to a more extensive description of the budgets for supportive services and operations, as well as acquisition, rehabilitation, new construction, rental assistance, leasing, and sources of financing documentation. HUD will use this detailed information to determine if a project is financially feasible and whether all proposed activities are eligible.

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.*

The Technical Submission is completely electronic and the application is directly connected to the forms required under this collection. The electronic version will significantly cut down on the time it takes to complete these forms by bringing forward data that has already been entered by applicants during the early phases of the competition.

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.*

The Technical Submission was previously streamlined to avoid duplication of information, with each data element collected during the competition, stored in a database, and available for reference during Technical Submission from which the applicant or HUD can make appropriate changes.

5. *If the collection of information impacts 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 states, local governments, private nonprofit organizations, and community mental health associations that are public non-profit organizations) and the need to consider all applications on an equal basis make it difficult to give special consideration to the burden placed on small entities by the collection of information. Instead, efforts have been made to minimize the burden placed on all applicants, while at the same time ensuring that sufficient information would be provided to allow HUD to determine and select the best applications.

6. *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 conditional applicants for funding. If HUD were to collect less information, or collect it less frequently, the Department could not make a final determination concerning the eligibility of applicants for grant funds and conditional applicants would not be eligible to sign grant agreements and receive funding.

7. *Explain any special circumstances that would cause an information collection to be conducted in a manner:*

- *requiring respondents to report information to the agency more than quarterly; **Not Applicable – No such requirement***
- *requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; **Not Applicable – No such requirement***
- *requiring respondents to submit more than an original and two copies of any document; **Not Applicable – No such requirement***
- *requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years; **Not Applicable – No such requirement***
- *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; **Not Applicable – No such requirement***
- *requiring the use of a statistical data classification that has not been reviewed and approved by OMB; **Not Applicable – No such requirement***
- *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; **Not Applicable – No such requirement**, or*
- *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. **Not Applicable – No such requirement***

This information is being collected in a manner consistent with the guidelines in 5 CFR 1320.6.

8. *If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency'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 agency in response to these comments. Specifically address comments received on cost and hour burden.*

- *Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported.*
- *Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.*

HUD published a notice in the *Federal Register* on October 11, 2019, vol 84 on page 54916 soliciting public comment regarding the last request for approval of the revised information collection. HUD received no comments from the public.

9. *Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.*

No payment or gift to respond is allowed.

10. *Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy.*

There is no assurances of confidentiality provided to the respondents for this information collection.

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. This justification should include the reasons why the agency considers the questions necessary, the 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.

This information collection does not include any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

12. Provide estimates of the hour burden of the collection of information. The statement should:
- indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally estimates should not include burden hours for customary and usual business practices;
  - if this request covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I; and
  - provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. 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 13.

Once a project is conditionally awarded, all applicants with new projects must complete the appropriate Technical Submission forms in e-snaps to receive funding. Each type of project will require a unique set of forms to meet compliance, and so the estimates below represent an average of applicants that have several forms to complete. We are anticipating a maximum of 750 responses this year.

Estimates of the public burden have been derived through program staff experience and input from previous applicants, and are shown in the table below:

Information Collection	Number of Respondents	Responses Per Year	Total Annual Responses	Hrs per Response	Total Hours	Hourly Cost Per Response	Annual Cost
Exhibit 3 CoC Technical Submissions e-snaps Forms, formerly HUD-40090-3(a-b)	750.00	1.00	750.00	8.00	6,000.00	47.52	285,120.00
<b>Submission Subtotal</b>	<b>750.00</b>	<b>1.00</b>	<b>750.00</b>	<b>8.00</b>	<b>6,000.00</b>	<b>47.52</b>	<b>285,120.00</b>
<b>Total Grant Program Application Collection</b>							
<b>Total</b>	<b>750.00</b>	<b>1.00</b>	<b>750.00</b>	<b>8.00</b>	<b>6,000.00</b>	<b>47.52</b>	<b>285,120</b>

Review each Technical Submission (\$47.52\* per hr. x 8 hrs. x 750 )= \$285,120.00

\*this figure is based on a GS-13, step 1 salary

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).
- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;
  - If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
  - generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There are no capital costs to respondents or record keepers

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational 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.

**This response has only changed to update the average government salary for the current year: Estimates of annualized cost to the Federal government (clerical and professional staff time)**

**Review each Technical Submission (\$47.52\* per hr. x .75 hrs. x 750 )= \$26,730.00**

\*this figure is based on a GS-13, step 1 salary

Federal Government Review of Information Collection	Number of Respondents	Responses Per Year	Total Annual Responses	Hrs per Response	Total Hours	Hourly Cost Per Response	Annual Cost
Exhibit 3 CoC Technical Submissions <i>e-snaps</i> Forms, formerly HUD-40090-3(a-b)	750.00	1.00	750.00	0.75	562.50	47.52	26,730.00
<b>Submission Subtotal</b>	<b>750.00</b>	<b>1</b>	<b>750</b>	<b>0.75</b>	<b>562.50</b>	<b>47.52</b>	<b>26,730.00</b>
<b>Total Grant Program Application Collection</b>							
<b>Total</b>	<b>750.00</b>	<b>1.00</b>	<b>750.00</b>	<b>0.75</b>	<b>562.50</b>	<b>47.52</b>	<b>26,730.00</b>

15. *Explain the reasons for any program changes or adjustments reported in Items 13 and 14 of the OMB Form 83-I.*

This is a reinstatement. The collection has been updated to account for the new government salary levels in effect since the last OMB approval.

16. *For collection 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.*

The results of this collection of information will not be published for statistical use.

17. *If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.*

No approval is sought to not display the expiration date for OMB approval of the information collection.

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

No exceptions identified.