

**SUPPORTING STATEMENT A
HOMELESS PROVIDER GRANT AND PER DIEM PROGRAM
OMB CONTROL NUMBER 2900-0554
[RIN 2900-AP54]**

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 (GPD) 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 does not require 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 Opportunity (NOFO) in standard business format, and they may use the federal-wide Standard Forms from the SF-424 family of forms. VA provides the outline for the collection in the NOFO 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.

In 2017, VA proposed to amend its regulations that govern the VA GPD Program. Several comments received in response to those proposed amendments were addressed in 2021, in the final rule. Also, in 2019, case management grants were added to the program (38 CFR 61.90-98). Further, there has been a sunset of the technical assistance grants and compliance reports are no longer required from grantees. The grantee does not provide a compliance report because it would be duplicative of information already available to 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.

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 twenty years and has proved effective. If these 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, 2013, 2061, 7721 note in a responsible manner, the program would lapse, these services for homeless Veterans would no longer be able to be funded and VA's effort to end Veteran homelessness would be significantly hindered.

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.

Consistent with the Government Paperwork Elimination Act (GPEA), VA encourages electronic submission. Potential applicants may find and apply for funding through Grants.gov. The first submission portion of the application is submitted electronically using existing SF-424 forms and templates available on Grants.gov. Applicants will be required to follow the instructions provided in the NOFO on Grants.gov in order to properly submit an application. If the provider is conditionally selected for funding they will be asked to complete a second submission package. This portion of the application also may be submitted electronically as described in the NOFO.

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Applicants who are not conditionally selected after the first submission would no longer incur the burden time of filling out the second submission. In the second submission 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 used to minimize burden.

Every effort has been made to minimize the burden to small businesses by keeping questions simple and to an absolute minimum. Also, effort has been made to minimize burden by using standard business methods and federal-wide SF-424 forms for grant applications.

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. If information were collected less frequently, VA would not be responsive to the needs of homeless Veterans, the communities served, and grantees nor to the legal requirement for a fair and transparent grant process.

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 proposed rule for 2900-AP54 was published in the Federal Register on July 25, 2017 (Volume 82, Number 141, Pages 34457-34464). VA received 15 comments in response to this notice, which are addressed in detail in the text of the final rule (cited below).

The final rule for 2900-AP54 was published in the Federal Register on June 25, 2021 (Volume 86, Number 120, Pages 33518-33525).

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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 Program. Feedback from community providers, Veteran Service Organizations, and other federal agencies on the 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 NOFO in a standard business format and through the federal-wide SF-424 family of forms thereby allowing greater flexibility and consistency. 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. Consultations with the community generally happen no less than annually and as frequently as monthly. In addition, VA solicits comments from the public through its 60- and 30-day Federal Register notices.

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.

Information collected is not filed in the medical record, nor in research records, nor in CHAMPVA. We offer no assurances of confidentiality. However, the files are maintained securely. 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: The total anticipated respondents = 950 and the total burden hours are 20,500.

a. At the start of each eligibility period, VA will publish a Notice of Funding Opportunity (NOFO) 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.

VA Homeless Providers Grant and Per Diem Program. 38 CFR §§ 61.11, 61.15, 61.17, 61.31, 61.41, and, 61.92 contain application provisions for capital grants, per diem, special needs grants, and case management grants.

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38 CFR §§ 61.62 has requirements under program changes and 61.80 has requirements under general operations. VA provides to the grantee (quarterly) the grantee's performance status regarding the VA performance metrics. The grantee does not provide a compliance report because it would be duplicative of information already available to 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

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 non-capital grant per diem	
Likely respondents	Public or nonprofit private entities	
Annual respondents		500
Frequency of annual responses		1
Annual burden hours per collection		20
Annual reporting & recordkeeping burden hours		10,000

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		50
Frequency of annual responses		1
Annual burden hours per collection		20
Annual reporting & recordkeeping burden hours		1,000

Application provisions for case management grants.

No form needed -- may be reported to VA in standard business narrative.

Need for information & proposed use of information	Determine eligibility for case management grants	
Likely respondents	Public or nonprofit private entities	
Annual respondents		300
Frequency of annual responses		1
Annual burden hours per collection		20
Annual reporting & recordkeeping burden hours		6,000

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.

This request covers the use of a standard business format for VA's Homeless Providers Grant and Per Diem Program. The separate hour burden estimates are listed for each funding opportunity (i.e., for capital, per diem, special needs, and case management). No VA forms are involved.

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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 \$305,655. 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 \$14.91 per hour.

Burden Hours	Cost per hour	Total
20,500	\$14.91	\$305,655

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. This information was taken from the following website: https://www.bls.gov/oes/current/oes_nat.htm. The mean hourly wage used here (\$14.91) is based on the BLS wage code “31-0000 Healthcare Support Occupations.”

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.
- c. There is no anticipated recordkeeping burden beyond that which is considered usual and customary.

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 **\$188,650**. 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	•Review, rate, score applications--25 GS –13/5 social workers @ \$48/hr average salary x 40 hours = \$48,000.	All application requirements provided in Notice of Funding Availability.	No printing needed – applicant provides application to VA.	•Toll-Free Phone/Fax Inquiry @ \$0.25/ min x 5/min call x 50 calls = \$62.50 •Information exchange--GS 13/5 @ \$48/hr ÷ 60 = .80 x 5 min x 2,000 = \$8,000 (\$8,062.50 total)	\$56,062.50
Per Diem Non-capital grant recipients Standard Business Format	•Review, rate, score applications--25 GS –13/5 social workers @ \$48/hr average salary x 40 hours = \$48,000.	All application requirements provided in Notice of Funding Availability	No printing needed – applicant provides application to VA.	•Toll-Free Phone/Fax Inquiry @ \$0.25/ min x 5/min call x 50 calls = \$62.50 •Information exchange--GS 13/5 @ \$48/hr ÷ 60 = .80 x 5 min x 2,000 = \$8,000 (\$8,062.50 total)	\$56,062.50
Special Needs Grant Standard Business Format	•Review, rate, score applications--15 GS –13/5 social workers @ \$48/hr average salary x 40 hours = \$28,800.	All application requirements provided in Notice of Funding Availability	No printing needed – applicant provides application to VA.	•Toll-Free Phone/Fax Inquiry @ \$0.25/min x 5/min call x 50 calls = \$62.50 •Information exchange--GS 13/5 @ \$48/hr ÷ 60 = .80 x 5 min x 300 = \$1,200 (\$1,262.50 total)	\$30,062.50
Case Management Grant Standard Business Format	•Review, rate, score applications--20 GS –13/5 social workers @ \$48/hr average salary x 40 hours = \$38,400.	All application requirements provided in Notice of Funding Availability	No printing needed – applicant provides application to VA.	•Toll-Free Phone/Fax Inquiry @ \$0.25/ min x 5/min call x 50 calls = \$62.50 •Information exchange--GS 13/5 @ \$48/hr ÷ 60 = .80 x 5 min x 2,000 = \$8,000 (\$8,062.50 total)	\$46,462.50
TOTAL					\$188,650

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

Burden hours and respondent burden account for BLS annual wage adjustments. Also, the estimated burden accounts for the addition of the GPD Case Management grants (38 CFR 61.90-98, adopted as a [final rule](#) on 6/26/2019) and for the sunset of Technical Assistance grants. Compliance reports no longer have an associated burden. Compliance information is captured elsewhere and therefore is not repeated in order to avoid duplication.

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.

VA does not intend to publish this data.

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 not 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.