

Supporting Statement for Paperwork Reduction Act Submissions
CoC Program Registration
(OMB# 2506-0182)

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.

Information is collected through the electronic e-snaps system that collects responses to the Continuum of Care (CoC) registration process to prepare CoCs for the annual Competition and is being revised to include Indian Tribes and Tribally Designated Housing Entities (TDHEs) as authorized by the Consolidated Appropriations Act, 2021 (Public Law 116-260, approved December 27, 2020). The Continuum of Care Registration (CoC) is the first part of the information collection process used by the U.S. Department of Housing and Urban Development (HUD) in the annual competitive homeless assistance program, the CoC program, authorized by the McKinney-Vento Homeless Assistance Act (the 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 Applicants review, update, and approve the geographic codes the CoC covers to provide housing and services to individuals and families experiencing homelessness. 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 to 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 nonprofit organizations, states, local governments, and instrumentalities of state and local governments, Indian Tribes or Tribally Designated Housing Entities (TDHEs) (as defined in section 4 of the Native American Housing Assistance and Self-Determination Act of 1996 (24 U.S.C. 4103), and Public Housing Agencies (PHAs), as such term is defined in 24 CFR 5.100) for the awarded funds under the CoC Consolidated Application.

The regulatory authority to collect this information is contained in the Act and 24 CFR part 578 (the Rule). Selection of applications for funding under CoC Program is based on rating factors listed in the annual Notice of Funding Availability (NOFA).

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.

All Collaborative Applicants are required to register their CoCs in the *e-snaps* electronic grants management system prior to the opening of the annual 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. If a Collaborative Applicant requests UFA designation or the CoC requests HPC designation, additional information is collected to determine if the Collaborative Applicant or CoC has the capacity to adhere to the requirements outlined in the Act and the Rule.

In tandem, Collaborative Applicants will also review, update as needed, and provide changes to the 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 prepopulated with basic project information for all eligible renewal projects in the annual Competition, including the current grants' budget details and is reviewed by HUD staff for accuracy prior to release to the public. Respondents must review the GIWs to determine accuracy and notify HUD if there are any changes via the GIW Change Form which will only include changes HUD will need to update on the original file and may include the addition of a project that is missing, removal of a project that is deemed ineligible for the Competition, and budget changes due to executed grant agreement amendments. The information from the GIW is essential for operation of the CoC Program Competition. The budget information included on the GIW is used to estimate the national Annual Renewal Demand (ARD), which provides the estimated amount of renewal funding request expected in the Competition. The program details, verified by the Collaborative Applicant, allows HUD to conduct an accurate assessment of renewal project applications at the completion of the application phase of the competition.

CoCs that merged after the previous year's registration process have are asked to complete the CoC Merger Worksheet. This worksheet is designed to help CoCs understand the Final Pro Rata Need (PPRN) that will be available to a merged CoC during the Competition process. Merging CoCs may complete these calculations independently from the worksheet, however the tool is a useful aid that simplifies the process for CoCs 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 each year.

2. 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 collection of information for the registration process is electronic and for most of the Collaborative Applicants can also be automatic if they choose this option. HUD uses *e-snaps*, an electronic grants management system, for the CoC Program Registration process which streamlines the collection of data and lessens the amount of time needed to complete this task. All Collaborative Applicants can import the previous year's information into the current year's electronic forms which reduces the amount of time needed to complete information and all they need to do is review the imported information for accuracy. Further, beginning in FY 2018 registration process, Collaborative Applicants were given the opportunity to not complete the registration process if they did not have any changes to the Collaborative Applicant or geographic codes, or if they did not want to apply for UFA and/or HPC designation. As stated in CPD-18-03: *CoC Program Registration Notice*, Collaborative Applicants that chose not to complete the registration forms would have the previous year's information automatically imported by HUD with no changes. Collaborative Applicants that take advantage of this availability will still have an opportunity to review the automatically imported information for accuracy before the process closes.

Additionally, due to language in the Act, any Collaborative Applicant requesting UFA designation must continue to request this designation annually. Collaborative Applicants that were awarded UFA designation in the previous year's registration process also have the availability to import the information into the current year's UFA forms and will only update information as needed. Only those Collaborative Applicants requesting UFA designation for the first-time, or previously requested and were denied, will need to complete all forms related to UFA designation in the registration process. This includes any Collaborative Applicant that applied for UFA designation in the previous registration process that was denied.

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.

To avoid duplication of information, the process has been streamlined, with each data element collected only once, stored in a database, and placed in all appropriate sections of the forms. Applicable information entered during CoC Program Registration will be imported to the CoC Consolidated application when the annual competition opens. 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.

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 nonprofit organizations, States, local governments, instrumentalities of State and local governments, Indian Tribes, THDEs, 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 sufficient information will be provided to allow HUD to determine and select the best proposals.

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 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.

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 – N/A;
 - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it – N/A;
 - requiring respondents to submit more than an original and two copies of any document – N/A;
 - requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years – N/A;
 - 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 – N/A;
 - requiring the use of a statistical data classification that has not been reviewed and approved by OMB – N/A;
 - 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 – N/A; 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 – N/A.

The special circumstances cited above do not apply to the CoC Program Registration process as it occurs annually, captures information electronically, and only collects information directly related to the registration of an organization to apply for CoC Program funds when the annual competition opens, including requests for UFA and HPC designation.

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.

The last placement in the Federal Register occurred December 17, 2020, pages 81946, vol 85 and HUD did not receive comments. The Consolidated Appropriations Act, 2021 (Public Law 116-260, approved December 27, 2020) added eligibility for Indian Tribes and TDHEs to form CoCs, be designated a Collaborative Applicant for a CoC, participate in the CoC as project applicant/recipient, and become a subrecipient for a project applicant/recipient. Additionally, information from Indian Tribes and TDHEs can be included the CoC Consolidated Application as it applies to the state of homelessness within their tribal area(s). Indian Tribes and TDHEs designated as a Collaborative Applicant can apply for UFA designation, and CoCs formed by Indian Tribes and TDHEs can apply for HPC designation.

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

No payment or gift to respondents is allowed.

10. 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.

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.

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.

The information below demonstrates the public burden for the CoC Program Registration. Approximately 405 CoCs, covering every geographic area of every state and most U.S. territories, will submit this form, including the GIW. Estimates of public burden have been derived through program staff experience and input from previous processes regarding the time it takes to verify the GIW and update all relevant Registration forms.

The hourly cost per response is based on GS-12, step 1 salary for government employees; however, most organizations submitting information have lower pay scales with the possible exception of state and local governments.

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 – Basic	405	1	405	1	405	\$41.78	\$16,920.90
CoC Registration – UFA designation request*	20	1	20	15	300	\$41.78	\$12,534.00
CoC Registration – HPC designation request*	5	1	5	10	50	\$41.78	\$2,089.00
Grant Inventory Worksheet	405	1	405	8	3,240	\$41.78	\$135,367.20
Total	405	1	835	5	3,995		\$166,911.10

*Responses to UFA and HPC designations are subsets of the total 405 basic registration numbers as the basic CoC Registration is completed by all Collaborative Applicants to register the CoCs. On average there are 20 requests for UFA designation and to date no requests for HPC designation. The total number of respondents is subject to change annually due to CoCs merging or splitting and with newly created CoCs due to authorizing language expanding eligibility (e.g., FY 2021 appropriations language authorizing the Indian Tribes and TDHEs eligibility to form CoCs, submit CoC Consolidated applications, and project applications).

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 additional costs to the respondents or recordkeepers.

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.

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 – Basic	405	1	405	1	405	\$53.00**	\$21,465.00
CoC Registration – UFA designation request*	20	1	20	4	80	\$53.00	\$4,240.00
CoC Registration – HPC designation request*	5	1	5	2	10	\$53.00	\$530.00
Grant Inventory Worksheet	405	1	405	2	810	\$53.00	\$42,930.00
Total	405	1	405	9	1,305		\$69,165.00

*Responses to UFA and HPC designations are subsets of the total 405 basic registration numbers as the basic CoC Registration is completed by all Collaborative Applicants to register the CoCs. On average there are 20 requests for UFA designation and to date no requests for HPC designation. **HUD staff is based on GS-13, step 3

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

The total burden hours changed from the previous PRA as the GIW collection is being moved from the application collection to the registration collection. The GIWs are completed between the registration process and the application process. Additionally, the total number of respondents is subject to change annually due to CoCs merging or splitting and with newly created CoCs due to authorizing language expanding eligibility (e.g., FY 2021 appropriations language authorizing the Indian Tribes and TDHEs eligibility to form CoCs, submit CoC Consolidated applications, and project applications).

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 information collection.

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

There are no exceptions to the signed certification

B. Collections of Information Employing Statistical Methods