

Supporting Statement for Paperwork Reduction Act Submissions
Continuum of Care (CoC) Program Homeless Assistance Grant Application

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 application system that collects responses to the Continuum of Care (CoC) application, CoC Priority Listing, and project application that is used by HUD to review and assess eligibility and quality threshold to determine which projects will be awarded conditional funding to address housing and service needs for individuals and families experiencing homelessness. 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 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 to increase self-sufficiency among individuals and families experiencing homelessness. The information also allows the U.S. Department of Housing and Urban Development (HUD) to assess project quality according to the threshold criteria established annually by the CoC Program Competition Notice of Funding Opportunity (NOFO) and according to the McKinney-Vento Act (Homeless Assistance) (42 U.S.C. 11371 et seq.) (the Act), and 24 CFR part 578 (the Rule).

The regulatory authority to collect this information is contained in 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 Consolidated Application 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 PRA package 2506-0182. This separation is necessary as the CoC Program Registration occurs several months prior to the 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 CoC Application, also called the CoC Consolidated Application, includes a CoC Application and CoC Project Listing with all 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, 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 grant funds available through the CoC Program as outlined in Section 427 of the Act.

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.

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: CoC Application, CoC Priority Listing, and project applications. Project applicants are organizations that submit project applications to CoCs for review in the local competition. All CoCs designated a Collaborative Applicant that submits the CoC Consolidated Application that includes all project applications that have been either accepted and ranked or rejected in the local competitions as a package to HUD. All parts of the CoC Consolidated Application are completed simultaneously throughout the Competition period. Portions of the CoC Application are dependent on information submitted in the project applications, but much of the CoC Application can be completed independently. Collaborative Applicants also review, accept and rank, or reject project applications submitted to the CoC Priority Listing.

CoC Application

The CoC Application serves as the backbone of the CoC Consolidated Application. It includes questions regarding 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 local processes and procedures for conducting an open, inclusive, and research informed local competition. HUD uses this information to rate each CoC with a score based on statutory, regulatory, and NOFO requirements where the score is compared both to a minimum threshold and to the scores of all other CoCs. This will determine the number of project applications that are selected for funding from each CoC.

Annually, approximately 405 CoCs are expected to submit a CoC Consolidated Application. These CoCs will oversee an approximate total of 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

Project applications are completed by nonprofit organizations, states, local governments, instrumentalities of state and local governments, Indian Tribes, TDHEs, and PHAs. There are six primary types of project applications: renewal, new, renewal Youth Homelessness Demonstration Program (YHDP), new replacement YHDP, CoC planning, and Unified Funding Agency (UFA) Costs projects.

Project applicants for new and renewal projects may receive CoC Program funds to provide permanent housing (PH), transitional housing (TH), Joint Transitional Housing and Permanent Housing-Rapid Rehousing (Joint TH and PH-RRH), and supportive services only (SSO) to individuals and families who are homeless, to develop and maintain a coordinated entry process, or to fund the CoC's Homelessness Management Information Systems (HMIS) and if needed, a comparable database for victim service providers. The project application collects information on the scope of the project, population(s) and subpopulation(s) served, number of beds and units, and 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. 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 working with homeless individuals and families.

Approximately 4,167 project applicants apply for 8,000 new and renewal projects annually. Many project applicants have multiple projects, thus the difference in the numbers. Most of the project applications are renewal CoC Program-funded projects (approximately 7,000). This number may decrease as project applicants can submit a request to consolidate renewal project applications, anywhere from two to four, so long as the projects are the same component (e.g., permanent housing-permanent supportive housing).

YHDP projects originally funded under the YHDP NOFO will apply for renewal funds in the CoC Program to continue operations. Due to Congressional action in the FY 2020 HUD Appropriations Act, expected to continue indefinitely, renewing YHDP project can replace the current renewal activities with other activities not permitted by the Act, but specific to serving youth populations (e.g., use CoC Program funds to pay for host homes which is not an eligible housing option under the CoC Program). If a renewing YHDP project applicant wants to apply to fund host homes, it will be required to submit a new YHDP project application. Approximately 80 renewal and replacement YHDP project applications are expected annually.

New project applications may be permitted if approved by Congressional action and in some years through the submission of bonus projects as authorized by Congress. This may add an additional 500 new project applications in an annual competition.

Collaborative Applicants designated by CoCs are eligible to apply for a CoC planning grant. By submitting a CoC planning project application CoCs can request funds to support local planning, needs assessment, and systems coordination designed to improve CoC operations and to help meet the statutory and regulatory requirements established by the Act and the Rule.

The Act and the Rule allow HUD to designate Collaborative Applicants as UFAs where this process is conducted during the CoC Program Registration process (PRA package 2506-0182). To receive UFA designation, Collaborative Applicants had to demonstrate strong operational capacity, a high functioning CoC Board, and necessary fiscal policies and procedures. Only those Collaborative Applicants designated by HUD as a UFA through the CoC Program registration process are 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 subrecipients and is the only recipient of CoC Program funds for the CoC. On average, 12 Collaborative Applicants are designated as UFAs and submit UFA Costs project applications annually.

CoC Priority Listing and Reallocation Forms

The CoC Priority Listing includes reallocation forms and Project Listings where each project application is accepted and ranked or rejected and communicates to HUD the rank order in which CoCs want HUD to prioritize funding for the submitted 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. The specific details on how the rank order is incorporated into the calculation for funding is included in the annual CoC Program Competition NOFO.

Once all project applications have been submitted to the CoC in *e-snaps*, CoCs must review the project applications and rank them based on the local needs and priorities, from highest (most important) to lowest (least important) on the CoC Project Listings. The reallocation forms are used to identify funds from eligible renewal projects that will be used to create new projects as outlined in the CoC Program Competition NOFO. CoCs can reduce or eliminate any number of eligible renewal projects and will use the reallocation forms to identify the eligible renewal projects that will be reduced or eliminated to create a new project application(s). The reallocation forms collect the eligible renewal project name, expiring grant number, project component, amount of funds that will be reduced or eliminated, and the reason the eligible renewal project is being reduced or eliminated through the reallocation process. Collaborative Applicants also record the new project information on the reallocation forms that includes basic new project information including, new project name, component, and amount of funding requested through the new project application.

Other Forms

The Department and CoC Program require the submission of additional forms with the applications. The CoC Consolidated Application requires submission of the HUD-2991, Certification of Consistency with Consolidated Plan, that is completed and attached to the CoC Priority Listing by Collaborative Applicants and includes all project applications submitted and signed by the local jurisdiction(s) official. All other required forms are completed by the project applicants in *e-snaps* where all the information is populated from other parts of the application and the applicant need only review for accuracy and check a box indicating the information is correct before they can access the actual application forms. The use of paper forms may be needed only if an awarded project transfers to another eligible recipient after the funding is awarded. 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 (if applicable); HUD-40090-4, Applicant Certification, 2 CFR part 200; HUD-50070, Certification for a Drug-Free Workplace; and Certification of Lobbying.

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 collection of information is electronic via *e-snaps*, an existing electronic grants management system for the CoC Consolidated application. The electronic *e-snaps* application process streamlines the application and lessens the reporting burden on applicants. Applicants log into a database driven website and type the required information. Both Collaborative Applicants and renewing project applicants can import the previous year's information into the current year's application form, review for accuracy, update information as needed, and if new questions are added, will only need to respond to those new questions in full. Project applicants are required to complete the application in full if submitting a new project application, first-time renewal project application, or taking advantage of the replacement ability permitted by appropriations language if the application is a renewal YHDP project. All "Other Forms" described in response to the previous question are completed electronically as part of the application.

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 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. Additionally, 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, limiting duplication; however, some of the information collected is 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.

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 Program funding (nonprofit organizations, states, local governments, and instrumentalities of state and local governments, Indian Tribes, TDHES, and PHAs) 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 is 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 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.

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 Competition process as it occurs annually, captures information electronically, and only collects information directly related to the applications submitted by organizations that apply for CoC Program funds.

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 14, 2020, page 80814, 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).

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.

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

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 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).

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 Applications							
CoC HIC (includes Subpopulation Extrapolation Tool, Stratified Extrapolation Tool, Housing Inventory Chart, and a General Extrapolation Tool)	405	1	405	8	3,240	*\$41.37	\$134,038.80
CoC PIT Process	405	1	405	8	3,240	\$41.37	\$134,038.80
CoC Application	405	1	405	50	20,250	\$41.37	\$837,742.50
CoC Priority Listing and Reallocation Forms	405	1	405	15	6,075	\$41.37	\$251,322.75
HUD-2991	405	1	405	3	1,215	\$41.37	\$50,264.55
Subtotal CoC Application	405	1	405	84	34,020	\$41.37	\$1,407,407.40
Project Applications							
Renewal Project	7,300	1	7,300	0.50	3,650	\$41.37	\$151,000.50
New Project	803	1	803	1.50	1,204.50	\$41.37	\$49,830.16

Renewal YHPD Project	200	1	200	1.50	300	\$41.37	\$12,411.00
Replacement YHPD Project	80	1	80	2	160	\$41.37	\$6,619.20
CoC Planning	405	1	405	1.50	607.50	\$41.37	\$25,132.27
UFA Costs	12	1	12	1	12	\$41.37	\$496.44
SF-424	8,800	1	8,800	0.05	440	\$41.37	\$18,202.80
HUD-2880	8,800	1	8,800	0.05	440	\$41.37	\$18,202.80
HUD-50070	8,800	1	8,800	0.05	440	\$41.37	\$18,202.80
SF LLL	8,800	1	8,800	0.05	440	\$41.37	\$18,202.80
Certification of Lobbying HUD-4156	8,800	1	8,800	0.05	440	\$41.37	\$18,202.80
HUD-40090-4	8,800	1	8,800	0.05	440	\$41.37	\$18,202.80
Subtotal Project Applications Submissions	8,800	1	8,800	8.3	8,574	\$41.37	\$354,705.87
CoC and Project Applications Overall Total							
Total for CoC and Project Applications	9,205	1	9,205	92.3	42,594	\$41.37	\$1,762,113.20

*The hourly cost per response is based on GS-12, step 1 pay; however, most applicant organizations pay scales considerably less, with the possible exceptions of state and local governments.

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 consider 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
Review and Panel CoC Applications*	405	1	405	4.0	1,620	\$53.00**	\$85,860.00
Review each Project application	8,800	1	8,800	1.0	8,800	\$53.00	\$466,400.00
Total	9,205	1	9,205	5.0	10,420	\$53.00	\$552,260.00

*Each CoC application is reviewed and paneled by two HUD staff with each person reviewing the same application and meeting to panel results.

**HUD staff is based on GS-13, step 3

The cost for project application review is based on averaging the different types of applications submitted. Review or renewal project applications take considerably less time, on average less than 15 minute; review of new applications, CoC planning, and renewal YHDP project applications average 30 minutes; estimated review of replacement YHDP project applications are 40 minutes, and review of UFA Costs project applications average 12 minutes as these applications mainly capture budget detail information. 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).

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

Information collected through the electronic *e-snaps* application system is used to review the responses to the Continuum of Care (CoC) application, CoC Priority Listing, and project application to review and assess eligibility and quality threshold to determine which projects will be awarded conditional funding to address housing and service needs for individuals and families experiencing homelessness. The total burden hours for both the application submission process and application review increased due to the increase in the number of CoCs from 390 to 400 and the addition of renewal YHDP and replacement YHDP project applications. Additionally, Congress has recently authorized Domestic Violence Bonus projects which increases the number of new projects and may authorize additional funding for other possible bonus projects or increase the amount of funds for the existing DV Bonus which is estimated in the calculations.

While HUD continues to encourage smaller CoCs to merge with larger CoCs which will reduce the total number of CoCs, as demonstrated in the previous PRA, there has been an increase in the number of CoCs as some larger CoCs have split, creating smaller CoCs thus increasing the number. The total number of CoCs reported in this PRA package reflects a cushion should additional CoCs split in the next three years. Additionally, changes may occur due to authorizing language expanding eligibility (e.g., the FY 2021 appropriations language authorized Indian Tribes and TDHEs eligibility to participate in the CoC Program) which may increase the number of CoCs, and applications submitted annually.

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.

B. Collections of Information Employing Statistical Methods