

SUPPORTING STATEMENT A

**VHA Homeless Programs  
Project CHALENG (Community Homelessness Assessment, Local Education  
and Networking Groups) for Veterans**

**OMB Control Number 2900-0843**

**A. JUSTIFICATION**

**1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.**

The Department of Veterans Affairs (VA) launched Project CHALENG (Community Homelessness Assessment, Local Education and Networking Groups) for Veterans in 1993 in response to Public Law 102-405 which required VA to make an assessment of the needs of homeless Veterans in coordination with other Federal departments, state and local government agencies, and nongovernmental agencies with experience working with homeless persons. Since 1993, VA has administered a needs assessment in accordance with guidance in Public Law 103-446 and Public Law 105-114. Legal authority for this data collection is found under 38 USC, Part I, Chapter 5, Section 527 that authorizes the collection of data that will allow measurement and evaluation of the Department of Veterans Affairs Programs, the goal of which is improved health care for Veterans.

This collection of information is necessary to ensure that VA and community partners are developing services that are responsive to the needs of local homeless Veterans, in order to end homelessness and prevent new Veterans from experiencing homelessness. Over the years, data from CHALENG has assisted VA in developing new services for Veterans such as the Homeless Veteran Dental Program (HVDP), the expansion of the Department of Housing and Urban Development-VA Supportive Housing (HUD-VASH) Program, the Veterans Justice Programs and Supportive Services for Veteran Families (SSVF). In addition, community organizations use CHALENG data in grant applications to support services for homeless Veterans; these grant applications are for VA, other Federal, local government, and community foundation dollars, which maximize community participation in serving homeless Veterans.

This collection will be an update of a collection approved in 2018. Revisions to the collection were made based on input provided by VA staff members to reduce the number of questions in the surveys. The collection consists of two forms/surveys: one for Veterans (VA Form 10-10161) and one for VA staff members, community homeless providers, and interested community members (VA Form 10-10162). The only difference between the two forms/surveys are the introductory demographic questions; the survey is the same for both groups.

**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.**

As required in the Public Law, the information is to be used by VA to plan services that meet the needs of homeless Veterans. In previous years, data from CHALENG have been used to develop the Homeless Veterans Dental Program, the Supportive Services for Veteran Families Program, the Veterans Justice Programs and to expand the U.S. Housing and Urban Development-VA Supported Housing (HUD-VASH) Program.

In addition, community organizations use CHALENG data in grant applications to support services for homeless Veterans; these grant applications are for VA, other Federal, local government, and community foundation dollars, which maximizes community participation in serving homeless Veterans.

Data from the proposed 2022 collection will be provided through a public Fact Sheet and presentations at national conferences. It will also be distributed among VA Homeless Programs at the national, VISN, and VHA medical center level to assist in refining existing programs or developing new programs and will be provided by request to community agencies.

**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.**

In 2012, CHALENG collection converted from a pencil and paper needs assessment to an online needs assessment with the link placed on the VA Homeless Programs website. This decision was made in consultation with the VA VISN Network Homeless Coordinators, who had been coordinating paper needs assessments in previous years and concurred that converting to an online format would maximize Veteran input by reducing the burden on respondents. At VHA medical center sites that prefer paper assessments or that do not offer free computer and internet services to Veterans, that option is available. Paper needs assessments are also available to the general public by request for individuals who prefer not to use the online interface. The proposed 2022 online collection will be via the Survey Monkey platform and will also be available on paper.

**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.**

No other component of VA conducts an assessment of the needs of homeless Veterans. Congress specifically required this data collection to ensure that services for homeless Veterans are planned according to an assessment of Veterans' needs. There is not any similar information already available that could be used to meet this purpose.

**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.

**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.**

The consequences if the information were not collected would be that VA would not have a mechanism to determine if needs among homeless Veterans are changing over time, and therefore could not plan for new services to meet newly unmet needs or adjust strategies and services for needs that were previously rated as "met" and change to "unmet." Not collecting information via the CHALENG needs assessment would also silence the voice of community partners in communicating their view of Veterans' met and unmet needs, as well as removing a vehicle for Veterans to directly express their view of met and unmet needs. VA would not be compliant with Public Law 103-446 and Public Law 105-114, which requires VA to collect this information to plan services that meet the needs of homeless Veterans.

There are no known technical or legal obstacles to reducing burden; the collection is offered in both online and paper and pencil formats to maximize ease of use.

**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 notice of Proposed Information Collection Activity was published in the Federal Register on July 2, 2021 (Vol. 86, No. 125, pages 35380-35381). VA received no comments in response to this notice.

The 30-day notice of Agency Information Collection Activity Under OMB review was published in the Federal Register on September 15, 2021 (Vol. 86, No. 176, page 51452-51453).

**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.**

Outside consultation is conducted with the public through the 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.**

The collection is anonymous; Public Laws 102-405, 103-446, 105-114 do not require respondents to identify themselves.

11. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), 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: Total burden hours = 480.

a. The number of respondents, frequency of responses, annual hour burden, and explanation for each form is reported as follows:

| CHALENG Survey             | No. of respondents | x No. of responses | x No. of minutes                     | ÷<br>by 60 = | Number of Hours |
|----------------------------|--------------------|--------------------|--------------------------------------|--------------|-----------------|
| Veteran Survey (10-10161)  | 3000               | 1 x 3000 =<br>3000 | 6 min x 3000 surveys =<br>18,000 min | ÷<br>by 60 = | 300 hours       |
| Provider Survey (10-10162) | 1800               | 1 x 1800 =<br>1800 | 6 min x 1800 surveys =<br>10,800 min | ÷<br>by 60 = | 180 hours       |

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 two forms, one for Veterans and one for VA and community homeless providers. However, the minute burden is the same for each form, 6 minutes per form.

c. Provide estimates of annual cost to respondents for the hour burdens for collections of information. 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 14.

The respondent population for the CHALENG Survey is composed of Veterans who are currently or formerly homeless, community providers of homeless services, and VA providers of homeless services. VA cannot make further assumptions about the population of respondents because of the variability of factors such as the educational background and wage potential of respondents. Therefore, VHA used general wage data to estimate the respondents' costs associated with completing the information collection.

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean hourly wage is \$27.07 based on the BLS wage code – "00-0000 All Occupations." This information was taken from the following website:

[https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm).

Legally, respondents may not pay a person or business for assistance in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VBA estimates the total cost to all respondents to be **\$12,993.60** (480 burden hours x \$27.07 per hour).

**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. Cost estimates are not expected to vary widely. The only cost is that for the time of the respondent.
- 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.**

The estimated annual cost to the Federal Government of supporting CHALENG is **\$104,700**. The cost is to support the 0.5 FTEE in the VHA Homeless Programs that is allocated to support collection of information, analysis of data, distribution of data, and responding to public inquiries regarding CHALENG. The position is a GS-14, step 6, and cost reflects locality pay plus benefits. See <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/LA.aspx>.

**15. Explain the reason for any burden hour changes or adjustments reported in items 13 or 14.**

This renewal requests a decrease in the time burden to complete the CHALENG survey. This is based on a change to the VA and community provider version of the survey that will reduce time burden from an estimated 9 minutes per survey to an estimated 6 minutes per survey. In the previous survey, providers were asked to rate each question for male Veterans and for female Veterans. Data analysis shows that providers rate each item for gender the same, as a result, in this requested version of the survey VA will ask providers to answer each item only once.

**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.**

Information from CHALENG is shared with the public via a Fact Sheet posted on the VA Homeless Programs website. CHALENG information is provided via tabulation of frequencies of responses and no complex analytical techniques are used.

Time schedule for entire project:

Begin collection of information: January 1, 2021

End collection of information: December 31, 2021

Analyze information: January 1, 2022 – March 31, 2022  
Obtain clearance: April 1 – 30, 2022  
Post Fact Sheet on website: May 1, 2022

This cycle will repeat for each year the CHALENG survey is authorized, so the 2022 collection results will be posted in 2023, and the 2023 collection results will be posted in 2024.

**17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

VA will include the expiration date on all forms.

**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.