

Part A: Supporting Statement

Unsheltered and Rural Homelessness Special NOFO

OMB Number: New Program, not yet assigned.

Introduction

Section 231 of the Department of Housing and Urban Development Appropriations Act, 2020 (42 U.S.C. 11364a; Public Law 116-94, approved December 20, 2019) provided HUD with authority to use recaptured CoC Program funds for the following purposes: (1) grants under the Continuum of Care program under Subtitle C of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11381 et seq.); (2) For grants under the Emergency Solutions Grants program under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371 et seq.); (3) Not less than 10 percent of the amounts shall be used only for grants in rural areas under the Continuum of Care program, to include activities eligible under the Rural Housing Stability Assistance program under section 491 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11408) that are not otherwise eligible under the Continuum of Care program; and (4) Not less than 10 percent of the amounts shall be for emergency solutions grants for disaster areas as authorized by subsection (c) of the FY 2020 Appropriations Act.

Unsheltered homelessness is continuing to rise in many areas of the country and a recent analysis of homelessness data shows that people experiencing unsheltered homelessness report significantly greater health challenges and experiences of trauma and violence than their sheltered peers. These challenges often begin before they lose their housing. Further, rural areas often lack the resources and infrastructure for providing homeless services and permanent housing and require unique strategies to reduce homelessness in their communities. To support Continuums of Care reduce unsheltered homelessness and respond to homelessness in rural areas, this Special NOFO utilizes the authority in paragraphs (a)(1) and (a)(3) of Section 231 of the Department of Housing and Urban Development Appropriations Act, 2020 to provide funds for housing, services, and data collection.

A1 Need and Legal Basis

Why is this information necessary? Identify any legal or administrative requirements that necessitate the collection.

The appropriation for this Special NOFO is made available through Section 231 of the Department of Housing and Urban Development Appropriations Act, 2020 (42 U.S.C. 11364a; Public Law 116-94, approved December 20, 2019). Through this Special NOFO, HUD is holding a competition to provide funding for housing, services, and data collection to help communities reduce unsheltered homelessness and reduce homelessness for highly vulnerable populations experiencing homelessness in rural areas. Without asking for this information, HUD will be unable to target funding to CoCs experiencing high rates of unsheltered homelessness

who have a comprehensive plan for reducing unsheltered homelessness across their geographic area. Reducing unsheltered homelessness is a priority of this Administration. To compete for these funds, CoCs must complete a CoC application – in which they will be asked to provide their plans for reducing unsheltered homelessness and use data and evidence to update their strategies for reducing unsheltered homelessness – as well as submit project applications that support their plans for reducing unsheltered homelessness across their geographic area.

Once projects have been selected, administration of the projects will follow the CoC Program requirements at 24 CFR part 578.

A2 Information Users

How is the information collected and how is the information to be used?

Information will be collected using an electronic submission process, *e-snaps*. This is the system used for the annual CoC Program Competition (see OMB 2506-0112). Collaborative applicants registered under the CoC Program (see OMB 2506-0182) are eligible to submit applications under this Special NOFO and will respond to selection criteria that are required by Section 427 of the McKinney-Vento Homeless Assistance Act as well as provide a narrative that will describe their plan to reduce unsheltered homelessness across their geographic area.

Project applications will be submitted with the CoC application. The information collected will be used to determine project eligibility and quality, whether the proposed project aligns with the community’s plan to reduce unsheltered homelessness, and to determine project award amounts. Applicants must be public or private organizations and will use the HUD electronic grants management system, *e-snaps*, which is the same form an process used during the CoC Program Competition (see OMB 2506-0112). Using the same information collection tools as the CoC Program Competition is critical to ensure compliance with Section 231 of the Department of Housing and Urban Development Appropriations Act, 2020 (42 U.S.C. 11364a; Public Law 116-94, approved December 20, 2019)..

This will be the first-time collecting information for this new program. This information collection is only needed one time for the collection of application information. Once the application information is submitted, HUD will process grants in accordance with previously approved OMB-approved collections (i.e., 2506-0183 – Technical Submission and 2506-0145 – Annual Performance Reporting). Any project applying for renewal funding beyond the initial term of this grant will apply through the annual CoC Program Competition (OMB-approved collection 2506-0112).

A3 Improved Information Technologies

Describe whether, and to what extent, the collection of information is automated (item 13b1 of OMB form 83-i). If it is not automated, explain why not. Also describe any other efforts to reduce burden.

HUD will require an electronic submission process for all phases of this Special NOFO. The collection of information for this Special NOFO is not automated in any way. Applicants will submit applications electronically and reviewers will review and score applications manually.

A4 Duplication of Similar Information

Is this information collected elsewhere? If so, why cannot any similar information already available be used or modified?

To avoid duplication of information, the application has been streamlined to capture only the statutorily required selection criteria for the CoC Program and the information HUD needs to evaluate whether the CoC has a plan, that is based on data and evidence, to effectively reduce unsheltered homelessness across its geographic area. To reduce burden, applicable information will use CoCs registered as part of the FY 2022 CoC Program Competition Registration process (OMB 2506-0112) and will enter the remaining CoC Application and Project Application information through *e-snaps*, which is used for the annual CoC Program Competition (2506-0112) and with which CoCs are familiar. The final part of the process – Technical Submission – will follow the process used in the annual CoC Program Competition (OMB 2506-0183), which project applicants are already familiar with. be entered into *e-snaps* the site selection process and project applications collect each data element only once, with one process focused on a system and the other on a project level. The coordinated community plan is designed to develop a new and unique product for the community and the required elements have never before been requested by HUD.

HUD has worked hard to eliminate overlap between the different steps in the process, and aside from collecting statutorily required information, is requesting new information that has not been captured from these communities for other federal government programs, regardless of whether the applicant is a current or former recipient of federal government funds. The creation of an electronic submission process is an attempt to lessen reporting burden on applicants.

A5 Small Businesses

Does the collection of information impact small businesses or other small entities (item 5 of OMB form 83-i)? Describe any methods used to minimize burden.

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 were 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 proposals.

A6 Less Frequent Data Collection

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.

The information will be collected one time for the purposes of this NOFO; it is required to fully assess each applicant's qualifications for the specific purposes of this Special NOFO. All information collected is used to carefully consider applications for selection, funding, and to determine whether the selected communities have met the expectations established by Congress; if HUD collects less information, or collected it less frequently, the Department could not accurately identify eligible sites, determine the eligibility of applicants for grant funds, or ensure that funds were spent according the intention of the appropriations.

A7 Special Circumstances

Explain any special circumstances that would cause an information collection to be conducted in a manner that would impose additional workload burden on recipients (see eight items listed in OMB guidance).

- 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; or n/a

- 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

This information is being collected in a manner consistent with the guidelines in 5 CFR 1320.6. There are not special circumstances.

A8 Federal Register Notice/Outside Consultation

The Unsheltered and Rural Homelessness Special NOFO has not yet been published as a Federal Register notice to solicit comments and public input. HUD is seeking a 7-day period of time to solicit comments and seek public input. HUD consults regularly with USICH, HHS, ED, DOL, and DOJ in developing its NOFOs, including all application requirements, and for this NOFO also consulted with various other stakeholders, including Tribes, people with lived experience of homelessness, and homelessness provider and advocacy organizations.

A9 Payment/Gift to Respondents

Explain any payments or gifts to respondents, other than remuneration of contractors or grantees.

There will be no payments or gifts to respondents.

A10 Confidentiality

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

No assurances of confidentiality are offered.

A11 Sensitive Questions

Justify any questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private.

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. The information will collect program and system level data only, and no personally identifiable information will be collected regarding current or future program participants.

A12 Burden Estimate (Total Hours and Wages)

Estimate public burden: number of respondents, frequency of response, annual hour burden. Explain how the burden was estimated.

CoCs who wish to apply for funds under this Special NOFO must submit the CoC application, related project applications, and must rate and rank the project applications on a Priority Listing as part of its submission to HUD in accordance with the approved CoC Program Competition process (OMB 2506-0112).

Approximately 250 CoCs will submit applications under this Special NOFO with approximately 3,000 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 Application	250	1	250	15	3,750	\$41.37	\$155,137.50
CoC Priority Listing and Reallocation Forms	250	1	250	5	1,250	\$41.37	\$51,712.50
HUD-2991	250	1	250	3	750	\$41.37	\$31,027.50
Subtotal CoC Application	250	1	250	23	5,750	\$41.37	\$237,877.50
Project Applications							
New Project	1,500	1	1,500	1.50	2,250	\$41.37	\$93,082.50
CoC Planning	250	1	250	1.50	375	\$41.37	\$15,513.75
UFA Costs	12	1	12	1	12	\$41.37	\$496.44

SF-424	1,500	1	1,500	0.05	75	\$41.37	\$3,102.75
HUD-2880	1,500	1	1,500	0.05	75	\$41.37	\$3,102.75
HUD-50070	1,500	1	1,500	0.05	75	\$41.37	\$3,102.75
SF LLL	1,500	1	1,500	0.05	75	\$41.37	\$3,102.75
Certification of Lobbying	1,500	1	1,500	0.05	75	\$41.37	\$3,102.75
HUD-40090-4	1,500	1	1,500	0.05	75	\$41.37	\$3,102.75
Subtotal Project Applications Submissions	1,762	1	1762	4.3	3,087	\$41.37	\$127,709.19
CoC and Project Applications Overall Total							
Total for CoC and Project Applications	2012	1	2012	25.3	8337	\$41.37	\$365,586.69

*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.

A13 Capital Costs

Estimate the annual capital cost to respondents or record keepers.

There are no capital costs to respondents or record keepers.

A14 Cost to the Federal Government

Estimate annualized costs to the Federal government.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
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Review and Panel CoC Applications*	250	1	250	2.0	500	\$53.00**	\$26,500
Review each Project application	1,500	1	1,500	.5	750	\$53.00	\$39,750
Total	1,750	1	3,250	2.5	1250	\$53.00	\$66,250

*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

A15 Program or Burden Changes

Explain any program changes or adjustments in burden.

This is a new program, so there are no program or burden changes.

A16 Publication and Tabulation Dates

If the information will be published, outline plans for tabulation and publication.

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

A17 Expiration Date

Explain any request to not display the expiration date.

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

A18 Certification Statement

Explain each exception to the certification statement identified in item 83i-19.

No exceptions identified.