



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-0050

OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

April 5, 2022

Ms. Jamie Dickinson
OMB Desk Officer
Office of Management and Budget
New Executive Office Building
Washington, DC 20503

Dear Ms. Dickinson:

The Department requests an emergency review of the Paperwork Reduction Act (PRA) requirements for the “Department of Housing and Urban Development Unsheltered and Rural Homelessness Special Notice of Funding Opportunity (NOFO)” Competition (Request). The Notice of Paperwork Submission (copy enclosed), submitted for immediate *Federal Register* publication, explains the burden of the collection requirements and invites public comments. This program is supported by the information collection for the Unsheltered and Rural Homelessness Special NOFO Competition (OMB control number pending).

Unsheltered homelessness is continuing to rise in many areas of the country. On a single night in 2019, roughly 568,000 people were experiencing homelessness in the United States. More than one-third of these were living in unsheltered locations such as on the street, in abandoned buildings, or in other places not meant for human habitation.¹ 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.² These challenges often begin before they lose their housing. The COVID-19 pandemic has exacerbated the health challenges related to homelessness and recent studies show that people experiencing homelessness with confirmed COVID-19 were more likely to be hospitalized and have more severe COVID-19 outcomes than those with COVID-19 in the general population.³ Many of the resources that communities have used to address unsheltered homelessness during the pandemic are winding down, creating an increased risk to people who remain unsheltered. At the same time, a Centers for Disease Control and Prevention study⁴ found that people experiencing homelessness had significantly lower vaccination coverage compared to housed residents living in the same geographic areas.

The emergency processing is requested to ensure that this Special NOFO Competition to support communities efforts to reduce unsheltered homelessness and innovatively reduce homelessness in rural areas can proceed on an expedited schedule. Providing housing and supportive services to help people experiencing homelessness obtain and maintain housing thus reducing their risk for trauma and increasing their health outcomes. The information gathered

¹ <https://www.huduser.gov/portal/sites/default/files/pdf/2019-AHAR-Part-1.pdf>

² <https://www.capolicylab.org/health-conditions-among-unsheltered-adults-in-the-u-s/>

³ (Cha et al., 2021; Han et al., 2021; Hsu et al., 2020; Leifheit et al., 2021)

⁴ https://www.cdc.gov/mmwr/volumes/70/wr/mm7048a4.htm?s_cid=mm7048a4_w

through the application is essential for the Department to fairly and expeditiously review and score applicants based on their experience, expertise, and proposed housing and supportive service activities.

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 four purposes, two of which area: (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.); and (2) 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. HUD is providing funding for Continuums of Care (CoCs) using these authorities to help them address unsheltered homelessness and, in rural areas, to implement the unique strategies often needed to reduce homelessness and to add resources and infrastructure that is lacking. Without asking for this information, HUD will be unable to ensure the communities awarded have the capacity to implement projects that support an overall strategy, based in data and evidence, to reduce unsheltered homelessness and amongst those individuals who are most vulnerable.

Therefore, in compliance with the requirements of 5 CFR Part 1320.13, this letter request expedited processing within seven days from the passage of the FY2022 annual appropriation.

Thank you for your consideration and assistance.

Sincerely,

James Arthur Jemison II
Principal Deputy Assistant Secretary
for Community Planning and Development