

**Department of  
Veterans Affairs**

**Memorandum**

Date: June 10, 2022

From: Michael P. Shores, Director, Office of Regulation Policy and Management, Office of the Secretary, Department of Veterans Affairs

Subj: Request for OMB review and consideration of emergency clearance for the “Legal Services for Homeless Veterans and Veterans At-Risk for Homelessness Grant Program” data collection, pursuant to interim final rule 2900-AR33

To: Dominic J. Mancini  
Acting Administrator, Office of Information and Regulatory Affairs (OIRA)

Cc: VA Desk Officer, Michael J. Ciccarone  
Office of Management and Budget (OMB)

Public Law 116-315, Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020, provided authority for VA's Homeless Programs Office (HPO) to grant funding to eligible organizations that will coordinate or provide legal services to Veterans who are homeless or at risk of homelessness. Several sections, including section 4202, of the Act were created to better serve veterans who are struggling with homelessness or housing insecurity.

To implement this program, and assess services and compliance with grants provided, VA will require submission of Applications for grants and Renewals of grants, as well as Performance Reports, Budget Changes, and Corrective Action Plans (CAPs). It is estimated that there will be 100 applicants, resulting in 75 grant awardees. The grant program information collection total annual burden will be approximately 4,070 hours.

This new grant program is being established through Interim Final Rule 2900-AR33. An emergency six-month Paperwork Reduction Act (PRA) clearance is requested because the use of regular OMB clearance procedures will not allow for coordination of the PRA clearance with publication of the rule.

Additionally, this rule implements the Act's mandate to establish a new grant program that will allow VA to make grants to eligible entities that provide certain legal services to homeless veterans and veterans at risk for homelessness, with at least 10 percent of funding being utilized to provide legal services to women veterans. This is the first Grant Program of this kind, as there is currently no other active Federal source of funding focused on providing legal services to veterans. Additionally, this rulemaking has not been without public input. VA reiterates that as described earlier in this document, VA sought and obtained such input through a consultation with several legal services

organizations experienced in aiding homeless veterans and those at risk for homelessness, as required by the Act. These organizations provided information on the types of legal services to be covered, additional considerations in dealing with rural and tribal communities, and how to determine the effectiveness of the organizations once competitively selected, among other information. This input has been reviewed and incorporated, as appropriate, in this rulemaking. For these reasons,

OMB PRA approval is respectfully requested by July 1, 2022.

Questions may be addressed to Michael P. Shores, via phone at (202) 461-4921 or via email at [michael.shores@va.gov](mailto:michael.shores@va.gov).

Thank you for your consideration of this matter.

## Michael P. Shores

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