

**Supporting Statement for Paperwork Reduction Act Submissions
(Youth Homeless System Improvement) (YHSI)
(OMB# 2506-0219)**

Introduction

The purpose of the Youth Homeless System Improvement (YHSI) program is to support selected communities in the development and implementation of systems infrastructure to better address youth homelessness. The grants will focus on systems change to create and build capacity for Youth Action Boards; collect and use data from different systems to improve the youth homeless response system; develop strong leaders within a community; and alter the coordination, communication, operation, and administration of homeless assistance projects to better serve youth, including prevention and diversion strategies. The goal of the YHSIG is to increase the capacity of communities to better serve youth and create projects that are responsive to the needs of youth at-risk of or experiencing homelessness in the community.

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.

This package is a new request for information collection for the Youth Homeless System Improvement (YHSI) program. HUD received \$25 million in funding for this program in the FY2022 Appropriations Act (Public Law 117-103, enacted on March 15, 2022) and in the FY2023 Appropriations Act (Public Law 117-328, enacted on December 29, 2022); HUD plans to combine both these appropriations into one competition for funding for a total of \$50 million.

HUD will award funds through a Notice of Funding Opportunity (NOFO) in order to identify those communities that will make best use of the congressionally appropriated funds and provide HUD with the best opportunity to meet the demonstration objectives. Without asking for this information, HUD will be unable to meet the congressional mandate within the Appropriations Acts.

Once applications have been selected, HUD will request biannual updates on how the projects are progressing and if they are meeting the milestones proposed through their YHSI NOFO application.

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.

Information will be collected from project selection applicants through a competitive process and will be used to monitor progress on project milestones via electronic submission (email or other system).

The project selection submission process will use grants.gov to coordinate electronic submission of grant applications. The information collected will be used to rate project selection applications, to determine eligibility for participation in the YHSI, to selecting participating communities and to establish grant amounts. Applicants will respond to narrative prompts to demonstrate their organizational capacity, integration of youth with lived experience in the organization, the organization's data and evaluation capacity. Additionally, applicants will need to submit a project proposal in their application, including target milestone dates, which will be rated according to the soundness of approach, potential impact, and the need in the community.

After projects have been selected and funded, HUD will ask for biannual updates on the progress made towards the milestones identified in the funding application. These progress updates will include any metrics identified by the recipient in their application as well as an opportunity to adjust milestones if needed.

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.

HUD will require an electronic submission process for all phases of the YHSI to streamline the application process and lessen the reporting burden on applicants. The collection of information for the YHSI is not automated in any way. Applicants will submit applications electronically and reviewers will review and score applications manually.

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

5. If the collection of information impacts small businesses or other small entities describe any methods used to minimize burden.

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 would be 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.

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 the YHSI. 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 to the intention of the appropriations.

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; 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

8. If applicable, provide a copy and identify the date and page number of publications 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 notice of proposed information collection has been published in the Federal Register on August 4, 2023, Volume 88, No., 149 page 51847. No comments received.

9. Explain any decision to provide any payment or gift to respondents, other than reenumeration of contractors or grantees.

There will be no payments or gifts to respondents.

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 is attached to this packet. 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, 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.

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 YHSI has two phases:

Phase 1

Project Selection Application

- Narrative responses; and
- Required attachments.

Phase 2

Milestone Reporting

- Narrative and numeric responses: and
- Required attachments.

The burden estimates are based on HUD’s staff experience with NOFOs, including the Youth Homelessness Demonstration Program (YHDP) and the Continuum of Care (CoC) program application.

The required attachments include:

- SF-424, Application for Federal Assistance (see Section of the 2016 NOFA General Section).
- SF-424B, Assurances for Non-Construction Programs.
- HUD-2880, Applicant/Recipient Disclosure/Update Report
- HUD-424-CBW, Grant Application Detailed Budget Worksheet
- Non-profit certification, for non-profit applicants only.
- Organizations Code of Conduct.
- OMB-SF-LLL-Disclosure of Lobbying Activities (where applicable).
- Youth Action Board Letter of Support.
- Letter(s) of support from partner organization(s), if the organization is identified as a partner in the proposed project (optional).

Approximately 100 applicants will submit applications for phase 1; approximately 40 will submit 12 milestone reports under phase 2. Estimates of the public burden are shown in the table below:

Submission Documents Information Collection	Number of Respondents	Responses Frequency (average)	Total Annual Responses	Burden Hours per Response	Total Hours	Hourly Rate	Burden Cost Per Instrument
<i>Component 1. Project Selection</i>							
YHSI Project Selection Narratives	100	1	100	22	2200	\$53.67	\$118,074.00
SF-424-Application for Federal Assistance	100	1	100	0	0	\$53.67	\$0.00

SF-424B Assurances for Non-Construction Programs	100	1	100	0	0	\$53.67	\$0.00
HUD-2880, Applicant/Recipient Disclosure/Update Report	100	1	100	0	0	\$53.67	\$0.00
HUD-424-CBW, Grant Application Detailed Budget Worksheet	100	1	100	0	0	\$53.67	\$0.00
OMB-SF-LLL- Disclosure of Lobbying Activities (where applicable)	100	1	100	0	0	\$53.67	\$0.00
Nonprofit Certification	50	1	50	0	0	\$53.67	\$0.00
Organizations Code of Conduct	100	1	100	0	0	\$53.67	\$0.00
Youth Action Board Letter of Support	100	1	100	1	100	\$53.67	\$5,367.00
Letter of Support- partner agency	100	1	100	1	100	\$53.67	\$5,367.00
Subtotal	100		100	24	2,400		\$128,808.00

Component 2. Milestone Reporting								
Narrative update on project progress	40	2	80	2	160	\$53.67	\$8,587.20	
Updated milestone chart	10	1	10	1	10	\$53.67	\$536.70	
Subtotal	50		90	3	270		\$9,123.90	
Total Application Collection	150		190	27	2,670		\$137,931.90	

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 take into account 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 our 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 capital costs to respondents or record keepers.

14. Provide estimates of annualized costs 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.

Estimates of annualized cost to the Federal government (clerical and professional staff time)

<u>Review each Site Selection Application</u> (\$53.67* per hr. x 3 hrs. x 100 applications x 2 reviewers per application)	\$32,202.00
<u>Notification of Site Selection Applicants</u> (\$53.67* per hr. x .5 hrs. x 40 selected sites)	\$1,073.40
<u>Review each milestone report</u> (\$53.67* per hr. x 1 hr. x 2 annual reports x 40 selected sites)	\$4,293.60
TOTAL	\$41,862.60

**This figure is based on a GS-13 salary from 2023 General Schedule (GS) Locality Pay Tables

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Project Selection	100	1	100	3	600	\$53.67	\$16,101.00
Milestone reporting	50	2	100	1	100	\$53.67	\$5,367

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

Previously approved collection, needed to add to forms to the collection

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.

Target milestone dates:

- NOFO publication: October 15, 2023
- NOFO award announcements: March 15, 2024

- First biannual project update: September 15, 2024

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 the information collection.

18. Explain each exception to the certification statement identified in item 19.

No exceptions identified.

B. Collections of Information Employing Statistical Methods