

Supporting Statement for Paperwork reduction Act Submission

Youth Homelessness Demonstration Program (YHDP)

OMB Number: 2506-0210

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.

The Youth Homelessness Demonstration Program (YHDP) was designed with the goal to prevent and end youth homelessness. In 2023, \$72 million was made available to communities to apply to identify, engage and respond to the needs of youth experiencing homelessness. The purpose of the YHDP is to support in the development and implementation of a coordinated community approach to preventing and ending youth homelessness and sharing that experience with and mobilizing communities around the country toward the same end. This goal includes assisting unaccompanied youth, including pregnant or parenting youth, age 24 and under, and can be broken down into eight objectives:

- **Prevent and End Youth Homelessness.** Provide funding, regulatory flexibility, and technical assistance to help communities develop housing and services for youth experiencing homelessness and make youth homelessness rare and, if it occurs, brief and non-recurring.
- **Build national momentum.** Motivate state and local homelessness stakeholders and youth services providers, including Runaway and Homeless Youth providers across the country to prevent and end youth homelessness by forming new partnerships, addressing system barriers, conducting needs assessments, testing promising strategies, and evaluating their outcomes.
- ~~**Promote equity in the delivery and outcomes of homeless assistance.** Recipients should promote equity throughout the community's youth homeless response system for youth who are disproportionately more likely to experience homelessness, such as Black, Indigenous, Hispanic (non-white), and LGBTQ+ youth. Awarded communities will promote equity throughout their youth homeless response system and all YHDP projects will measure and demonstrate equitable delivery and outcomes. This includes identifying barriers that led to any disparities in subpopulations being served and taking steps to eliminate these barriers in the community's youth homeless response system.~~
- **Highlight the importance of youth leadership.** Demonstrate effective models of strong leadership and agency by youth with lived experience in the community. Create replicable best practices of youth leadership for other communities.

- **Evaluate the coordinated community approach.** Evaluate coordinated community approaches to preventing and ending youth homelessness, including local and state partnerships across sectors and other coordinated operational planning.
- **Expand capacity.** Expand community capacity to serve youth experiencing homelessness (particularly by using a Housing First approach), pilot new models of assistance, and determine what array of interventions is necessary to serve the target population in their community.
- **Evaluate performance measures.** Evaluate the use of performance measurement strategies designed to better measure youth outcomes and the connection between youth program outcomes and youth performance measures on overall system performance for the Continuum of Care (CoC); and
- **Establish a framework for Federal program and Technical Assistance (TA) provider collaboration:** Determine the most effective way for Federal resources to interact within a state or local system to support a coordinated community approach to preventing and ending youth homelessness.

Appropriations for the YHDP have been made available in Federal Fiscal Years (FFYs) 2016-2023. The most recent appropriation, the Consolidated Appropriations Act, 2023 (Public Law 117-328, approved December 29, 2022) made \$72 million available to HUD “to implement projects to demonstrate how a comprehensive approach to serving homeless youth, age 24 and under, in up to 25 communities, including at least eight rural communities, can dramatically reduce youth homelessness.” HUD awards YHDP 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 act.

Once communities have been selected, HUD must collect individual grant applications related to the specific projects to be implemented.

Finally, HUD must collect the Coordinated Community Plan to meet the appropriations requirement to “demonstrate how a comprehensive approach to serving homeless youth...can dramatically reduce youth homelessness.” In HUD’s experience leading similar coordinated community efforts (e.g., [LGBTQ Youth Homelessness Prevention Pilot, OMB 2506-0204](#)), the planning process is a challenging and resource intensive endeavor, requiring systems analysis, values sharing, priority negotiating, the creation of leadership structure, the development of a logic model, and a plan for constant feedback and continuous process improvement, among other things. The submission of a coordinated community plan will allow HUD to assess the ability of the selected communities to appropriately use the funding made available by Congress.

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 in two phases using an electronic submission process. The first phase is the community selection application submission process, and the second phase includes both the project application and coordinated community plan submission processes.

The community selection submission process will use grants.gov to coordinate electronic submission of grant applications. The information collected will be used to rate community selection applications, to determine eligibility for participation in the YHDP, to select participating communities and to establish the amounts available for each community. ~~It is anticipated that applicants~~ Applicants, which must be collaborative applicants registered under the CoC Program (see OMB 2506-0182), will respond to narrative prompts to demonstrate the integration of the Youth Action Board into the CoC structure; Community Need; Collaboration; Youth Collaboration; and Data and Evaluation Capacity. Additionally, the community selection process will include ~~two~~ bonus point opportunities: ~~Serving Structurally Disadvantaged Areas and for Rural Areas.~~

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Individual YHDP project applications will be submitted following the announcement of community selection. The information collected will be used to determine project eligibility and quality, whether the proposed project aligns with the community's coordinated community plan, and 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 and 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 that the awarded project will be in compliance and prepared to apply under the CoC Program when the first grant term expires if they apply for renewal.

Selected communities are required to develop a coordinated community plan to prevent and end youth homelessness, which must be submitted electronically via email to HUD within 6 months of the site selection announcement. Communities may request up to a 2-month extension of this deadline by sending an email. The information collected will be used to determine HUD approval of a coordinated community plan, and will depend on threshold criteria, including whether the plan addresses the mandatory structural components and key HUD principles included in the NOFO that are essential to a successful youth homelessness system.

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 YHDP to streamline the application process and lessen reporting burden on applicants. The collection of information for the YHDP is not automated in any way. Applicants will submit applications electronically and reviewers will review and score applications manually. Applicants do have the ability to request a waiver of the electronic application submission requirement.

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.

To avoid duplication of information, the community 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 unique product for the community. HUD has worked hard to eliminate overlap between the different steps in the process and 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.

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 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.

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 intent is for information to 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 YHDP. 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; **does not apply**

- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; **does not apply**
- requiring respondents to submit more than an original and two copies of any document; **does not apply**
- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years; **does not apply**
- 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; **does not apply**
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB; **does not apply**
- 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 **does not apply**
- 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. **does not apply**

8. If applicable, provide a copy and identify the date and page number of publication 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.

Published in the Federal Register on April 10, 2023, vol 88, page 21204. No comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration 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. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

[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 chart below; 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 YHDP has two phases and three main components:

Phase 1

Component 1. Community Selection Application

- Narrative responses; and
- Required attachments

Phase 2

Component 2. Project Application

- Narrative, grid form, numeric, and multi-choice, responses: and
- Required attachments

Component 3. Coordinated Community Plan

- Narrative-based plan and logic model (template provided)

YHDP selected communities will be CoCs, or parts of CoCs, represented by the CoC collaborative applicant. These entities have demonstrated experience completing a CoC Program Competition CoC application, which is a longer a more comprehensive system-wide homelessness system application process. The burden estimates are based on HUD’s long experience with the CoC Program Competition and the understanding that all applicants by definition will have experience responding to similar style and related homelessness system questions.

YHDP project applicants will be local or state government entities, local public housing authorities, Indian Tribes or tribally designated housing entities as defined in Section 4 of the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4103), or public or private nonprofit entities. The application is designed to replicate the CoC Program Competition project application which has been used in a similar form for several years and with which many applicants for the YHDP will be familiar including the exact project application questions. The burden estimates are based on HUD’s long experience with the CoC Program Competition *Project Application* and the understanding that many applicants will be current or former CoC Program project grant recipients and therefore will have experience responding to the exact questions in the application.

YHDP coordinated community plans will be completed by each of the selected communities. The burden estimates are based on HUD’s staff experience and input of previous year applicants.

The required attachments include:

- SF-424, Application for Federal Assistance.
- HUD-424-B- Applicant Assurances and Certifications.
- Non-profit certification, for non-profit applicants only.
- Organization’s Code of Conduct (Most already on file accounted for during the CoC Program Competition).
- Acknowledgement of Application Receipt (HUD2993), for applicants submitting paper applications only.

Approximately 150 applicants will submit applications for Component 1, 25 will submit an average of 5 applications each for Components 2, and 25 will submit plans for Component 3. Estimates of the public burden are shown in the table below:

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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Component 1. Community Selection							
YHDP SiteCommunity Selection Narratives	150	1	150	24	3,600.00	53.67	\$193,212.00
SF-424- Application for Federal Assistance	150	1	150	0.5	750	53.67	\$4,025.250
HUD-424B- Applicant Assurances and Certifications	150	1	150	0	0	\$53.67	\$0
OMB-SF-LLL- Disclosure of Lobbying Activities (where applicable)	10	1	10	0.17	1.70	\$53.67	\$91.240
Nonprofit Certification	150	1	150	0	0	\$53.67	\$0.00
Organizations Code of Conduct	150	1	150	0	0	\$53.67	\$0.00
Youth Action Board Participation Letter	150	1	150	0.5	75	53.67	\$4,025.25
Public Child Welfare Agency Commitment Letter	150	1	150	0.5	75	53.67	\$4,025.25
Acknowledgement of Application Receipt (HUD-2993) (only applicants granted waiver to submit a paper application)	10	1	10	0.17	0.34	\$53.67	\$18.250
Subtotal	150		150		3,827.04750.00		205,397.24\$201,262.50
Component 2. Project Application							
YHDP Project Application Questions	75125	51	125	8	1,000.00	53.67	\$53,670.00
SF-424- Application for Federal Assistance	75125	51	125	0.08	100	\$53.67	\$536.700
HUD-2880- Applicant/Recipient Disclosure/Update Report ((2501-0017)) (2501-0017)	75125	51	125	0.17	21.25	53.67	\$1,140.49
OMB-SF-LLL- Disclosure of Lobbying Activities (where applicable)	75125	51	125	0.17	21.250	\$53.67	\$1,140.490
Subtotal	75125		125		1,052.50021.25	-	\$56,487.6854,810.49
Component 3. Coordinated Community Plan							
YHDP Plan Narrative	25	1	25	240	6,000.00	53.67	\$322,020.00
Logic Model	25	1	25	8	200	53.67	\$10,734.00
Certification of Consistency with the Consolidated Plan (HUD-2991)	25	1	25	0.17	4.25	53.67	\$228.10

(2506-0112)							
Subtotal	25	1	25	248.17	6,204.25		\$332,982.10
Total Application Collection	150		300		11,083.79 <u>975.50</u>		\$594,867.03 <u>89,055.09</u>

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 already reflected on the burden worksheet 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 out 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 cost 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 Community Selection Application</u> (\$53.67* per hr. x 2 hrs. x 150 applications)	\$16,101.00
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<u>Notification of Community Selection Applicants</u> (\$53.67* per hr. x .5 hrs. x 25 selected sites)	\$670.88
<u>Review each Project Application</u> (\$53.67* per hr. x 2 hrs. x 125 applications)	\$13,417.50
<u>Notification of Project Applicants</u> (\$53.67* per hr. x .5 hrs. x 50 awardees)	\$670.88
<u>Review each Coordinated Community Plan</u> (\$53.67* per hr. x 2 hrs. x 25 plans)	\$2,683.50
<u>Notification of Collaborative Applicants</u> (\$53.67* per hr. x .5 hrs. x 25 selected sites)	\$670.88
TOTAL	\$34,214.64

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

** The number of CoCs is doubled to reflect the need for two reviewers of each application.

15. Explain the reasons for any program changes or adjustments reported in Items 12 and 14 of the Supporting Statement.

This submission is to request a revision of a currently approved collection. This is a previous program with adjustments in the burden cost and hours. The changes in burden cost are due to increase in the GS hourly pay rate from \$47.52 to \$53.67 and a change to the estimated number of communities selected (from 50 selected communities to 25). The changes in burden hours are due to adding in need to review standard documents. Burden increase from \$30,860.25 to \$34,214.64.

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.

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 display the expiration date for OMB approval of the information collection.

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