

**SUPPORTING STATEMENT FOR
COMPONENTS OF THE HOMELESS VETERANS' REINTEGRATION PROGRAM
BUDGET AND NARRATIVE FORM**

OMB CONTROL NO. 1293-0NEW

This ICR seeks to obtain approval for a new information collection for the Homeless Veterans' Reintegration Program Budget and Narrative Form.

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.

The Department of Labor's VETS administers funds for the Homeless Veterans' Reintegration Program (HVRP) grant on an annual basis. These competitive grants are codified under 38 U.S.C. 2021, 2021A, and 2023. VETS provides funds to grant recipients through annual Funding Opportunity Announcements (FOA) and incremental funding throughout the grant's three-year (12 quarters) period of performance. The total number of grant recipients varies from year to year based on the amount of available funds. Grants are awarded for up to \$500,000 each year, for a total of up to \$1,500,000 for the three-year period of performance.

The Assistant Secretary for Veterans' Employment and Training monitors and supervises the distribution and use of those funds as required by 38 U.S.C. 2021 and 38 U.S.C. 2021A. Additionally, and in accordance with 38 U.S.C. 2021(d), the Secretary shall collect such information as that Secretary considers appropriate to monitor and evaluate the distribution and expenditure of funds appropriated to carry out this section.

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.

The approval of this form will create the use of standardized formats for grant recipients' preparation of the budget and budget narrative. In accordance with 2 C.F.R. Appendix-I-to-Part-200(b)(4)(ii)(I), VETS' annual FOA requires the submission of a budget narrative for VETS' applicants to show that their proposed costs are allowable under 2 C.F.R. § 200.403 and are necessary and reasonable for carrying out the HVRP grant.

Collecting this information via this form helps to ensure that requested data is provided in a uniform way, reporting burdens are minimized, errors in budget formulation and calculation are nullified, and the impact of collection requirements on respondents are described in its

instructions. VETS will use the HVRP Budget and Narrative Form for monitoring the expenditure of grant funds according to the program budget throughout the period of performance, and to satisfy the regulatory requirements in accordance with 2 C.F.R. § 200.308(c) if there is a need for the grant recipient to request a budget revision. This collection instrument is clearly understood by respondents, and the information is easily evaluable by VETS for cost principles guidelines found in 2 C.F.R. Part 200, Subpart E.

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.

All respondents submit the form electronically. The HVRP Budget and Narrative Form is a user-friendly, fillable, Microsoft Excel-based form designed to calculate totals by respondent's cost associated within each object class category, and total overall budget. It provides fields for the grant recipient to input the justification of costs for VETS to determine if the costs are allowable, allocable, reasonable and necessary for HVRP.

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 A.2 above.

In accordance with 2 C.F.R. Appendix-I-to-Part-200(b)(4)(ii)(I), VETS' annual FOA requires the submission of a budget narrative for VETS' applicants to show that their proposed costs are allowable under 2 C.F.R. § 200.403 and are necessary and reasonable for carrying out the HVRP grant. There are no other form or requests of applicants or grant recipients to submit to VETS or other agencies the information collected in this manner that would appear duplicative.

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

This information collection does not impact small businesses or other small entities

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.

Per 38 U.S.C. 2021(d), VETS shall monitor and evaluate the distribution and expenditure of funds appropriated to carry out the HVRP. Without these collections, data may not be provided in a uniform way, reporting burdens are increased due to errors that applicants or grant recipients may make in developing their budget, in both mathematically estimating cost and the narrative justification. This collection instrument reduces errors in budget formulation and calculations are nullified.

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 often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **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**
- **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.**

VETS does not anticipate any special circumstances that would necessitate any of the above-listed requirements.

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 on 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 may preclude consultation in a specific situation. These circumstances should be explained.

The Department published a Federal Register notice on 06-10-2025, (90 FR 10474), notifying the public of its intent to pursue this information collection (OMB Control Number 1293-0NEW).

A summary of comments follows, along with our responses:

i. **Comment:** A current HVRP grant recipient emailed HVRP@dol.gov stating: "As a current HVRP grant recipient, I would like to express support for the proposed HVRP Budget and Narrative Form. The standardized format is clear, practical, and aligns well with the reporting and compliance requirements under 2 CFR 200.403 and subpart E. We appreciate the Department of Labor's effort to streamline the budgeting process and reduce the administrative burden. Having a consistent structure improves efficiency and helps ensure accurate and compliant submissions."

VETS response: VETS acknowledged the comment by thanking the grant recipient for their submission.

ii. **Comment:** Two HVRP grant recipient commentators requested the HVRP Budget and Narrative Form itself because it was not published in the FRN.

VETS response: VETS provided both commentators with a copy of the draft HVRP Budget and Narrative Form. There were no further replies from either commentator.

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

VETS did not provide any payments or gifts to respondents.

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

VETS did not provide any assurance of confidentiality to respondents.

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.

No questions of this nature are included in any component described in this information collection request.

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. General, estimates should not include burden hours for customary and usual business practices.¹**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**
- **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.**

To determine the average burden for this collection of information, VETS reviewed the five-year average number of applications for the first year of the three-year period of performance (151) collections per year.

For the average burden hours per year: 151 respondents at 6 hours per collection once a year equals 906 hours. The average burden hours are derived from VETS staff estimates, and a similar collection requirement approved for the U.S. Department of Justice, Office of Justice Programs under OMB approval No. 1121-0329, which does not capture all the budget details required for HVRP by the U.S. Department of Labor.

Affected Public: HVRP Applicants/Recipients (151), that may be businesses or other for-profits, not-for-profit institutions, State and Local Governments.

¹ Indicate the retention period for any recordkeeping requirements that pertain to the ICR is in accordance with 2 C.F.R. §§ 200.334-200.338

Estimated Annualized Respondent Cost and Hour Burden

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Monetized Value of Respondent Time
HVRP Budget and Narrative Form	151	1	151	6	906	\$64.00 ²	\$57,984.00

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 and purchase of service 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

² Hourly rate is based on the Department's Bureau of Labor Statistics' quarterly economic analysis series titled "Employer Costs for Employee Compensation." The \$64.00 figure was derived from Table 3 titled, "Employer costs per hour worked for employee compensation and costs as a percent of total compensation: State and local government workers, by major occupational and industry group," dated March 2025.

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 is no additional cost to respondents. Respondents will not need to purchase any equipment or special software to respond to this new information collection request. Applicants must already use computing devices, computing peripherals, hardware, and software to apply for any federal assistance award. This information collection request may be completed without purchasing a license for access and completion.

14. Provide estimates of the 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), 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 into a single table.

The annualized cost to the Federal Government's burden is \$6,825.20, with spending calculated with one hour spent on each of the 151 respondents at an hourly rate of \$45.20 as calculated based on footnote 3.

Estimated Annualized Government Cost and Hour Burden

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Monetized Value of Respondent Time
HVRP Budget and Narrative Form	151	1	151	1	151	\$45.20 ³	\$6,825.20

15. Explain the reasons for any program changes or adjustments.

This is an initial request for collection, therefore there are no program changes or adjustments.

16. For collections of information whose results will be published, outline plans for tabulations, 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.

³ Hourly rate is based on the Congressional Budget Office Report #60235, Comparing the Compensation of Federal and Private-Sector Employees in 2022, April 2024, <https://www.cbo.gov/publication/60235>.

The Department does not publish the results of this information collection.

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.

The Department does not seek an exception to the requirement to display the expiration date on this information collection.

18. Explain each exception to the certification statement.

The Department is not requesting an exception to any of the certification requirements for this information collection. This request complies with 5 C.F.R. § 1320.9.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.

There are no statistical methods in this collection.