SUPPORTING STATEMENT FOR
Homeless Veterans' Reintegration Program Grant Recipient Reporting

OMB CONTROL NO. 1293-0014

This ICR seeks approval for a revision of the Veterans' Employment and Training Service Competitive Grant Programs Reporting information collection. VETS proposes to revise the title to the Homeless Veterans' Reintegration Program Grant Recipient Reporting.

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 collection of information is necessary for the proper oversight of discretionary grant funds administered by the Department of Labor's (DOL) Veterans' Employment and Training Service (VETS) as required by law and regulations. These discretionary grants fund over 150 homeless veterans' reintegration projects that serve over 16,000 veterans experiencing and at-risk of homelessness annually.

The Homeless Veterans' Reintegration Program (HVRP) is authorized under 38 USC 2021, 2021A, and 2023. The collection of program data is mandated under 38 USC 2021 (d), (g) and (h). The Homeless Women Veterans and Homeless Veterans with Children Reintegration grant program (HWVHVWC) is authorized under 38 USC 2021A. The collection of program data is mandated under 38 USC 2021A(c) and (e).

There are two administrative provisions in Title 2 of the Code of Federal Regulations (CFR) related to grant recipient performance reporting. Performance measurement is authorized under 2 CFR 200.301 and the monitoring and reporting of program performance is authorized under 2 CFR 200.329.

See Attachment A Citation List for the full text of relevant sections for each statute and regulation cited above.

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.

Quarterly Performance Report (QPR): grant recipients submit a performance report every quarter via the VETS Grantee Reporting System (VGRS) to their assigned VETS Grant Officer's Technical Representative (GOTR) throughout the grant's three-year period of performance.

Respondents enter participant and project information into the online system VGRS. Responses are collected when participants enroll in the program, beginning with the start of the program year on July 1. At the end of each quarter, grant recipients certify their performance outcomes and explain why actual performance results deviate from the grant's goals, describe remediation strategies to improve any performance failures, confirm financial management practices, provide timesheet and vacancy updates on personnel, communicate information about grant-related activities, and identify significant achievements. VETS' staff review these reports to monitor the overall performance of each grant.

Stand Down After Action Report (SDAAR): grant recipients that have completed Stand Down events submit the SDARR form via email to their VETS GOTR at the conclusion of the event. The SDAAR summarizes the event location, participant count/demographics, cost/expenditure calculations, and types of services provided at the event. VETS staff use this information to track and assess the performance of each Stand Down.

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.

QPR: All respondents are required to submit the form electronically via an online system called VGRS. The instrument file contains a complete set of respondent-facing fields, instructions, and system navigation procedures that HVRP grant recipients use to complete and submit the QPR.

SDAAR: The form is a fillable Adobe PDF; it is submitted electronically via email to the VETS GOTR. Blank forms are available for download via publicly accessible websites.

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.

Any federal grant award has two main components. The first component is the applicant's planned work under the award. This will consist of a description of the work to be completed, the way the funds will be expended (budget), and the expected outcomes (goals). The second component is the reporting of actual work, expenditures, and outcomes. Between this ICR and the second identified below, all information collection requirements of the federal grant award process are covered for HVRP.

This ICR (1293-0014) covers the reporting of actual work, expenditures, and outcomes. The other ICR (1293-0018) covers the planned work to be completed (Abstract and Planned Goals) and the manner in which the funds will be expended (Budget Narrative).

The information collected does not duplicate any other Department of Labor OMB-approved information collection.

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

Although some HVRP grant recipients may be small nonprofit organizations or small businesses, VETS minimizes burden by offering fully electronic submission, pre-populated fields (where applicable), and a consolidated reporting process. Electronic submission decreases administrative time spent on uploading, mailing, or formatting reports. The streamlined structure ensures that small entities do not experience disproportionate burden compared to larger organizations.

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 QPR is required on a quarterly basis. This information ensures the required project information is consistent throughout the grant's three-year period of performance and across all HVRP grants within a single program year.

The SDAAR form is completed once per Stand Down grant award. The form is due 30 days after the end of the quarter in which the Stand Down event took place, aligning the submission deadline with the QPR.

Without these collections, VETS cannot report on the activities and outcomes associated with the funding provided by Congress to provide services to veterans as codified under 38 USC §2021 and 38 USC §2021A nor would the Secretary of Labor have the information needed to report to Congress in accordance with the above statutes. VETS would also be unable to meet its fiduciary and programmatic oversight obligations. The agency must measure the grant recipient's performance to show achievement of program goals and objectives and monitor progress as required by 2 CFR 200.301 and 2 CFR 329.

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 confidentially 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 confidentially 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.

VETS published a Federal Register Notice on September 4, 2026 (91 FR 56918), notifying the public of its intent to revise this information collection. The comment period closed on November 3, 2026.

VETS received comments from one individual and replied directly to the commenter with responses on all items. The comments and our response, grouped by topic, are summarized below. No changes to the proposed collection were made in response to these comments.

Transferring applicant forms from this collection to 1293-0018

The commenter approved of VETS proposed consolidation of applicant forms into a single collection. VETS appreciates the support of the proposed revision.

Migration of grant recipient reporting to an online system
The commenter approved of VETS proposed migration of Excel and PDF forms to a web-based system. VETS appreciates the support of the proposed revision.

Outcome measures, data collection requirements, and reporting of grant recipient performance
The commenter suggested that VETS identify outcome measures, map reporting fields to those measures or to statutory requirements, remove unnecessary fields, and publish measures annually by grantee. VETS indicated that it periodically reviews reporting requirements to help ensure that collected information supports program administration, performance monitoring, oversight responsibilities, and applicable reporting requirements. Statutory and regulatory requirements that align to program measures are identified in the supporting statement (see Attachment A Citation List). VETS clarified that recommendations regarding the public publication of grant recipient-level performance information are outside the scope of this information collection.

Publication of burden hour estimates
The commenter recommended that VETS publish form-specific burden estimates and include a one-time transition estimate for the new reporting system. VETS stated that form-specific burden estimates and the basis for those estimates are identified in the supporting statement and the number of burden hours for the QPR will be posted in the online system and listed directly on the SDAAR form.

Data minimization principles
The commenter advised that VETS apply data minimization principles to participant records to only collect identifiers, housing status, and required health-related elements. VETS responded that it collects the information necessary to administer the program, monitor performance, and satisfy applicable statutory and regulatory oversight requirements.

Record retention and disclosures
The commenter proposed that VETS state the retention period and list every system or agency that receives participant-level data and the purpose of each. VETS indicated that this data is retained and disposed of in accordance with applicable federal records management requirements and National Archives and Records Administration (NARA)-approved records schedules. Specific retention requirements are established through those authorities rather than through this information collection. No other system in VETS collects this data and other agencies' systems are outside the scope of this information collection request

Pre-population of recipient reports and bulk uploads from grantee systems
The commenter suggested that VETS pre-populate grant recipient reports for goals, budget, personnel, and past performance using the information submitted from the application and permit bulk uploads of data from grantee systems. VETS stated that much of the application information is pre-populated by VETS staff prior to grant recipient reporting, to include goals, award

amounts for the budget, and approved positions for personnel. Connections to externally produced grant recipient data and/or systems for uploading purposes is outside the scope of this information collection.

Publication of annual reporting system metrics
The commenter recommended that VETS publish the reporting system's on-time submission rate, completeness, and share of reports returned for correction to better measure burden and data quality. VETS responded that the collection is designed to support grant recipient reporting and oversight requirements. Recommendations concerning the development or publication of the system's data quality metrics and/or the grant recipients' timeliness of reporting is outside the scope of this information collection request.

Organizations operating HVRP grants had prior knowledge of the forms in this collection and that VETS continuously solicits their feedback on the reporting forms, clarity of instructions, and ease of use. This feedback is delivered through "Listening Sessions" hosted by the VETS National Office and "Community of Practice" consultations conducted by the National Veterans' Technical Assistance Center (NVTAC). Comments and suggestions from these events were incorporated into the forms prior to submitting this information collection request.

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 does not provide respondents with an assurance of absolute confidentiality; however, information is protected in accordance with applicable federal privacy and information security requirements. The information collection includes personally identifiable information (PII) collected through the online quarterly reporting system, VGRS. Information is protected from unauthorized access, use, or disclosure in accordance with applicable federal law, Department of Labor privacy and information-security policies, and system access controls. VETS has published a Privacy Impact Assessment (PIA) for VGRS, and a related System of Records Notice (SORN) is currently undergoing Departmental review and clearance. VETS is coordinating with the Department of Labor Privacy Office to ensure compliance with all applicable Privacy Act requirements and notice provisions.

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.

The collection does not include questions concerning sexual behavior, religious beliefs, or similarly sensitive matters unrelated to program eligibility or performance. The QPR does collect certain participant-level demographic, disability, military service, and housing information that may be considered private. These data are necessary to determine program eligibility, administer the HVRP program, monitor service delivery and outcomes, evaluate grant recipient performance, and satisfy applicable statutory and program reporting requirements, such as 38 USC 2021(g). Grant recipients collect and enter the information as part of program enrollment, service delivery, and performance reporting. Information maintained in VGRS is subject to applicable privacy, access, and information-security safeguards.

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, a sample of three current HVRP grant recipient staff members and one NVTAC contractor provided time estimates for how long it took to complete and submit each data collection instrument.

QPR Time per Response & Frequency per Year: The average time for the QPR was two hours and 52 minutes, which was rounded up to three hours. A grant recipient must submit the QPR four times a year.

SDAAR Time Per Response & Frequency per Year: The SDAAR form's completion time is 45 minutes. A grant recipient must submit the form once for each Stand Down event.

QPR Estimated Number of Annual Respondents: VETS used the average of the total number

[1] Indicate the retention period for any recordkeeping requirements that pertain to the ICR.

of HVRP grant recipients for the three most recently awarded program years, which came to 155.

SDAAR Estimated Number of Annual Respondents: VETS used the average of the total number of Stand Down events for the three most recently completed fiscal years, which came to 39.

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[2]	Total Burden Cost
QPR	155	4	620	3.00	1,860.00	$38.65	$71,889
SDAAR	39	1	39	0.75	29.25	$38.65	$1,131
Unduplicated Total	**194**		**659**		**1,889.25**	**$38.65**	**$73,020**

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.**

[2] Hourly rate for grant recipient respondents is based on the Department's Bureau of Labor Statistics' series titled "Occupational Employment and Wage Statistics." The $38.65 hourly wage rate was derived from the median (Percentile = 50%) hourly wage for Social and Community Service Managers, published May 2025.

- **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.**

Respondents will not need to purchase any equipment or special software to respond to this information collection request. There is no additional cost to respondents.

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.

Total Annualized Cost to the Federal Government: the estimated annualized cost to the Federal Government is **$714,553**. This total combines the costs of VGRS system operations and maintenance and federal employee staff time.

Systems Operations & Maintenance:
The annual operations and maintenance cost for VGRS is $570,645.

Estimated Annualized Government Cost for Federal Staff and Hour Burden
The annual cost for Federal staff time used the number of annualized responses from the table in Question 12, four hours of review time per QPR response, and 15 minutes of review time per SDAAR response. The total federal staff cost is $143, 908.

Activity	No. of Annualized Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate[3]	Federal Employee Cost
QPR	620	4.00	2,480.00	$57.80	$143,344
SDAAR	39	0.25	9.75	$57.80	$564
Total	**659**		**2,489.75**	**$57.80**	**$143,908**

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

Respondents: The number of respondents decreased from 291 to 155 for the QPR. This decrease was due to the consolidation of four separate QPR forms into a single QPR, which reduced the annual number of grant recipient respondents for the collection.

[3] Hourly rate is based on the 2026 OPM Salary tables for GS-13 Step 5 Rest of US Hourly Rate of $57.80, effective January 2026.

Responses: The number of responses decreased from 2,716 to 659 due to the removal of three instruments from this collection which reduced the number of responses for the quarterly performance reports from 12 to four. Previously, grant recipients submitted up to four Excel/PDF forms per quarter. Consolidating these forms into an online system reduces the number of annual responses to four.

Burden Hours: The total number of burden hours decreased from 11,180 hours to 1,889 hours due to the removal of three instruments from this data collection and a reduction in the average burden hours per activity, which was over 14 hours for one of the instruments and over seven hours for another. The migration to VGRS reduced the respondent burden associated with inputting and transmitting the QPR via multiple Excel workbooks and individual PDFs. Automated data validations reduced the number of corrections/revisions, and the online system directly connects the TPR's performance goals/outcomes to the TPN's justifications.

See Attachment B Itemized Revisions for additional information on the program changes associated with the migration to VGRS and an itemized list of proposed revisions to all of the forms in this information collection.

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.

The number of participants served and the number of participants who exited without placement by state is published in the HVRP Report to Congressional Committees as required by 38 USC 2021(h)(2) no later than 120 days after the end of each program year. The report is usually published by October 31 and is available on the DOL VETS website at: VETS HVRP Report to Congressional Committees.

VETS also publishes an annual summary report of the most recently completed program year's national targets and outcomes. The report is usually published in mid to late October and is available on the DOL VETS HVRP website at: HVRP National Targets & Outcomes.

There are no complex analytic techniques used in the creation of these reports.

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.

VETS 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.

VETS is not requesting an exception to any of the certification requirements for this information collection.

B. COLLECTIONS OF INFORMATON EMPLOYING STATISTICAL METHODS.

There are no statistical methods in this collection.