

Supporting Statement for Paperwork reduction Act Submission
Youth Homelessness Demonstration Program (YHDP)

OMB Number: 2506-0210

Introduction

The Youth Homelessness Demonstration Program (YHDP) was designed with the goal to prevent and end youth homelessness. In 2019, \$75 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 unaccompanied youth, including parenting youth, where no member of the household is older than 24, and can be broken down into five objectives:

1. Build national momentum. Motivate state and local homelessness stakeholders across the country to collaborate for an end to youth homelessness by forming new partnerships, addressing system barriers, conducting needs assessments, testing promising strategies, and evaluating their outcomes; through the issuance of a NOFA, supportive policy briefs, consistent cross agency messaging and the development of substantial supportive technical assistance material;
2. Evaluate the coordinated community approach. Evaluate promising strategies in the development of a coordinated community approach to end youth homelessness, including the development of local and state partnerships across sectors (i.e. with mainstream partners) and other planning operations;
3. Evaluate individual interventions. Evaluate a specific set of promising interventions in order to more accurately describe the necessary array of youth appropriate interventions and what works for whom;
4. Evaluate performance measures. Evaluate the use of unique 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 CoC;
5. Establish a framework for federal program and TA collaboration. Determine the most effective way for federal level resources to interact within a state or local system to support a coordinated community approach to ending youth homelessness.

A1 Need and Legal Basis

Why is this information necessary? Identify any legal or administrative requirements that necessitate the collection.

Appropriations for the YHDP have been made available in Federal Fiscal Years (FFYs) 2016, 2017, 2018 and 2019. The most recent appropriation, the Consolidated Appropriations Act, 2019 (Public Law 1166, approved February 15, 2019) made \$75 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 Availability (NOFA 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 sites have been selected, HUD must collect individual grant applications to meet the appropriations act requirement that demonstration projects be renewable under the CoC Program authorized by the McKinney-Vento Act, as amended by S. 896 The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 (42 U.S.C. 11371 et seq.) and the CoC Program Homeless Assistance Grant Application requirements (OMB 2506-0112).

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.

A2 Information Users

How is the information collected and how is the information to be used?

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

The site selection submission process will use grants.gov to coordinate electronic submission of grant applications. The information collected will be used to rate site selection applications, to determine eligibility for participation in the YHDP, to selecting participating communities and to establish grant amounts. Applicants, which must be collaborative applicants registered under the

CoC Program (public or private nonprofit organizations, see OMB 2506-0182), will respond to narrative prompts to demonstrate their leadership capacity, the current youth homelessness resource capacity, the community need for youth homelessness assistance resources, the communities capacity for innovation, the current level of local collaboration among stakeholders, including youth with lived experience, and the community's data and evaluation capacity.

Coordinated Community Plan applications will be submitted following the announcement of site 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 to determine 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 and they apply for renewal, as directed by the appropriations Act.

A first draft of a community's coordinated community plan to end youth homelessness must be submitted electronically via email to HUD within 4 months of the site selection announcement. 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 values included in the NOFA that are essential to a successful youth homelessness system.

A3 Improved Information Technologies

Describe whether, and to what extent, the collection of information is automated (item 13b1 of OMB form 83-i). If it is not automated, explain why not. Also describe any other efforts 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 this requirement.

A4 Duplication of Similar Information

Is this information collected elsewhere? If so, why cannot any similar information already available be used or modified?

To avoid duplication of information, the site 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 new and unique product for the community and HUD has never before requested the required elements. 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.

A5 Small Businesses

Does the collection of information impact small businesses or other small entities (item 5 of OMB form 83-i)? 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.

A6 Less Frequent Data Collection

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 NOFA; 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 the intention of the appropriations.

A7 Special Circumstances

Explain any special circumstances that would cause an information collection to be conducted in a manner that would impose additional workload burden on recipients (see eight items listed in OMB guidance).

- 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
- 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 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

A8 Federal Register Notice/Outside Consultation

Published in the Federal Register on January 28, 2020; vol 85, page 5013. No comments were received

A9 Payment/Gift to Respondents

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

There will be no payments or gifts to respondents.

A10 Confidentiality

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

The Privacy Act of 1974 provided privacy protection to respondents. There are no assurances of confidentiality provided

A11 Sensitive Questions

Justify any questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private.

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.

A12 Burden Estimate (Total Hours and Wages)

Estimate public burden: number of respondents, frequency of response, annual hour burden. Explain how the burden was estimated.

The YHDP has two phases and three main components:

Phase 1

Component 1. Site 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 sites will be CoCs, or parts of CoCs, represented by the CoC collaborative applicant, a local or state government entity, local public housing authority, or a public or private nonprofit entity. 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, 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 (see Section of the 2016 NOFA General Section);

- 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;
- SF-424, Supplement, Survey on Equal Opportunity for Applicants (“Faith Based EEO Survey (SF424 SUPP)” on Grants.gov) (to be completed by private nonprofit organizations only);
- Letter verifying membership in the CoC of the local public child welfare agency and their participation in the YHDP.

Approximately 150 applicants will submit applications for Component 1, 25 will submit an average of 5 applications each for Component 2, and 25 will submit plans for Component 3. 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
Component 1. Site Selection							
YHDP Site Selection Narratives	150.00	1.00	150.00	24.00	3,600.00	49.19	\$177,084.00
SF-424- Application for Federal Assistance	150.00	1.00	150.00	0.00	0.00	49.19	0.00
OMB-SF-LLL-Disclosure of Lobbying Activities (where applicable)	10.00	1.00	10.00	0.00	0.00	49.19	0.00
Nonprofit Certification	150.00	1.00	150.00	0.00	0.00	49.19	0.00
Organizations Code of Conduct	150.00	1.00	150.00	0.00	0.00	49.19	0.00
Youth Advisory Board Participation Letter	150.00	1.00	150.00	.50	75.00	49.19	\$3,689.25
Public Child Welfare Agency Commitment Letter	150.00	1.00	150.00	.50	75.00	49.19	\$3,689.25
Acknowledgement of Application Receipt (HUD-2993) (only applicants granted waiver to submit a paper application)	10.00	1.00	10.00	.17	1.70	49.19	\$83.62
Subtotal	150.00		150.00		3,751.70		\$184,546.12
Component 2. Project Application							
YHDP Project Application Questions	25.00	5.00	125.00	8.00	1,000.00	49.19	\$49,190.00
SF-424- Application for Federal Assistance	25.00	5.00	125.00	0.00	0.00	49.19	0.00
HUD-2880- Applicant/Recipient Disclosure/Update Report (2510-0011)	25.00	5.00	125.00	.17	21.25	49.19	1,045.29
OMB-SF-LLL-Disclosure of Lobbying Activities (where applicable)	1.00	5.00	5.00	0.00	0.00	49.19	0.00
Subtotal	25.00		125.00		1,021.25		\$50,235.29
Component 3. Coordinated Community Plan							

YHDP Plan Narrative	25.00	1.00	25.00	240.00	6,000.00	49.19	\$295,140.00
Logic Model	25.00	1.00	25.00	8.00	200.00	49.19	\$9,838.00
Certification of Consistency with the Consolidated Plan (HUD-2991)	25.00	1.00	25.00	.17	4.25	49.19	\$209.06
Subtotal	25.00	1.00	25.00		6,204.25		\$305,187.06
Total Application Collection	150.00		300.00		10,977.20		\$539,968.47

A13 Capital Costs

Estimate the annual capital cost to respondents or record keepers.

There are no capital costs to respondents or record keepers.

A14 Cost to the Federal Government

Estimate annualized costs to the Federal government.

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

<u>Review each Site Selection Application</u> (\$49.19* per hr. x 2 hrs. x 200 applications)	\$19,676.00
<u>Notification of Site Selection Applicants</u> (\$49.19* per hr. x .5 hrs. x 10 selected sites)	\$245.95
<u>Review each Project Application</u> (\$49.19* per hr. x 2 hrs. x 60 applications)	\$5,902.80
<u>Notification of Project Applicants</u> (\$49.19* per hr. x .5 hrs. x 50 awardees)	\$1,229.75
<u>Review each Coordinated Community Plan</u> (\$49.19* per hr. x 2 hrs. x 10 plans)	\$983.80
<u>Notification of Collaborative Applicants</u> (\$49.19* per hr. x .5 hrs. x 10 selected sites)	\$245.95
TOTAL	\$28,284.25

**This figure is based on a GS-13 salary from 2020 General Schedule (GS) Locality Pay Tables

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

A15 Program or Burden Changes

Explain any program changes or adjustments in burden.

This submission is to request a revision of a currently approved collection. This is a previous program with adjustments in the burden cost. The changes in burden cost are due to increase in the GS hourly pay rate from \$36.75 to \$49.19.

The chart has been updated to add in more columns such as Hourly Rate and Burden Cost per Instrument.

A16 Publication and Tabulation Dates

If the information will be published, outline plans for tabulation and publication.

The results of this collection of information will not be published for statistical use.

A17 Expiration Date

Explain any request to not display the expiration date.

No approval is sought to not display the expiration date for OMB approval of the information collection.

A18 Certification Statement

Explain each exception to the certification statement identified in item 83i-19.

No exceptions identified.