MEMORANDUM FOR: Jemine A. Bryon, Deputy Assistant Secretary, Office of Special Needs, DN

FROM: Norm Suchar, Director, Office of Special Needs Assistance Programs, DNS

SUBJECT: Environmental Assessment and Finding of No Significant Impact under the National Environmental Policy Act (NEPA) – HUD’s National Homeless Data Analysis Project Notice of Funding Opportunity (NOFO) (FR-6500-N-85)

It is the finding of this office that the attached funding notice does not constitute a major Federal action having an individually or cumulatively significant effect on the human environment and therefore does not require the preparation of an environmental impact statement.

Through this NOFO HUD is announcing the availability of up to $12.3 million in funding for its National Homeless Data Analysis Project (NHDAP). NHDAP provides critical resources to communities to improve data collection and reporting, integrate data collection efforts in Homeless Management Information Systems (HMIS) with other federal funding streams, use software as a service for data integration and to enhance the ability for HUD and communities to report and analyze data about persons experiencing homelessness, produce standards and specifications for data entry and reporting for all HMIS-generated reports, analyze point-in-time and longitudinal data to produce the Annual Homeless Assessment Report (AHAR), and provide technical assistance on HMIS implementation.

NHDAP activities are designed to assist HUD in providing support to Continuums of Care (CoCs) to achieve the highest level of performance and results for HMIS and comparable database implementations. NHDAP is an integration of technical assistance, capacity building, and support services. NHDAP activities are authorized under: The Further Consolidated Appropriations Act, 2020 (Public Law 116-94), approved December 20, 2019 (FY2020 HUD
NHDAP includes four distinct projects: (1) Sage HMIS Reporting Repository (Sage), (2) National HMIS Data Lab, (3) Annual Homeless Assessment Report (AHAR) and Homeless Data Exchange (HDX), and (4) HMIS Data Standards.

This office finds this funding notice does not have a significant impact on the human environment for two reasons:

1. The activities funded by the program consist of training, education, advice and technical support, and administrative expenses, which have no significant physical impact on the environment. These activities are exempt or categorically excluded from review under the National Environmental Policy Act due to the lack of potential for any significant effect on the environment, and do not require review under related environmental authorities, under 24 CFR 50.19(b)(3), (9), and (13); 58.34(a)(3) and (a)(9); and 58.35(b)(3).

2. The funding notice permits leasing of existing office space as an administrative cost, but provides that the facilities must not require rehabilitation or construction except for minimal alterations to make the facilities accessible for a person with disabilities, prohibits the use of funds provided under the NOFO for property repairs or renovations, and prohibits leasing or renting properties in the Coastal Barrier Resources System designated under the Coastal Barrier Resources Act (16 U.S.C. 3501) with federal funds.

Accordingly, the publication of this notice is deemed not to be a major Federal action having a significant impact on the human environment.
CONCURRENCES:

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OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT

APPROVAL:

Jemine A. Bryon
Deputy Assistant Secretary, Office of Special Needs
Office of Community Planning and Development

Date