



Yes  No

Phone: (202) 708-3700

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**19. Certification for Paperwork Reduction Act Submissions**

On behalf of the U.S. Department of Housing and Urban Development, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9.

**Note:** The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320/8(b)(3). appear at the end of the instructions. The certification is to be made with reference to those regulatory provisions as set forth in the instructions.

The following is a summary of the topics, regarding the proposed collections of information, that the certification covers:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities;
- (d) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) It indicates the retention periods for recordkeeping requirements;
- (g) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
  - (i) Why the information is being collected;
  - (ii) Use of the information;
  - (iii) Burden estimate;
  - (iv) Nature of response (voluntary, required for a benefit, or mandatory);
  - (v) Nature and extent of confidentiality; and
  - (vi) Need to display currently valid OMB control number;
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to collected (see note in item 19 of the instructions);
- (i) It uses effective and efficient statistical survey methodology; and
- (j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in item 18 of the Supporting Statement.

Signature of Program Official:          X	Date:
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Signature of Senior Officer or Designee:       X Lillian L. Deitzer, Departmental Reports Management Officer, Office of the Chief Information Officer	Date:
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## Supporting Statement for Paperwork Reduction Act Submissions

### A. Justification

- 1. Is this information necessary?** This research effort will provide important information about the extent and impact of the Service Coordinator Program that is not otherwise available from HUD records. Title 12 U.S.C., 1701z-1, authorizes the collection of this information. A copy is attached.
- 2. How will this information be used?** This information collection involves a telephone survey of multifamily property managers. The survey will be administered to a statistical sample of properties that are eligible for the Service Coordinator Program. The Department does not know the extent of properties with Service Coordinator grants. This research serves two purposes. First, through developing an estimate of the number of eligible projects that actually have service coordinators, this study will assess the availability of service coordinators for residents of Multifamily Assisted Housing. Second, to better understand what difference service coordination makes in providing supportive services to elderly and non-elderly people with disabilities living in HUD-assisted housing, this study will provide some evidence of the importance of service coordinators for aging in place. In the past, AARP conducted a more limited study of service coordination that collected information on Section 202 properties, whereas this research will collect information from the universe of eligible properties.
- 3. To what extent is the collection of information automated?** This information will not be collected through automated means, but instead will be collected through a manual telephone survey. In order to automate this telephone survey, the Department would need to contract this study out to a firm that has the capability to collect the information using a Computer Assisted Telephone Survey (or CATI) system. HUD does not have a CATI system and currently, there is not sufficient funding to contract for this information collection system. Rather, HUD's trained project research staff will administer the telephone survey manually using existing departmental resources. The progress of the survey will be tracked electronically using a Microsoft Access database that contains pre-loaded contact information and a contact log that provides a complete record of all activity with each respondent. For example, the following data will be tracked in the database: date of each contact with the property, the person contacted, the action (e.g., left message, reached contact, referred to another contact person), the next contact date, whether an interview was completed, and other contact notes. Microsoft Access will be used to manage information collected from the survey questionnaire by using tables, forms, and queries. Data collected in Microsoft Access will be analyzed statistically using SPSS software.
- 4. Is this information collected elsewhere?** To a very limited extent, HUD records indicate some of the Multifamily Assisted Housing properties that have a Service Coordinator grant; however, this information is incomplete. Reporting of Service Coordinator grants is haphazard and inconsistent. Also, a Semi-Annual Performance Report for the Multifamily Housing Service Coordinator Program is submitted by participating properties to the local HUD Field Office. However, these records are not electronic and are not submitted to a centralized location (such as HUD Headquarters). Furthermore, the Semi-Annual Performance Report does not provide sufficient information to answer questions regarding the extent and level of satisfaction with the Service Coordinator Program. In order to collect this information, and reduce the burden on the public, this study will involve administering a telephone survey to a statistical sample of properties that are eligible for the Service Coordinator Program.
- 5. Does the collection of information impact small businesses or other small entities?** No, the information collection will not have an economic impact on small business or other small entities. All data collection is voluntary.

6. **What is the consequence to the Service Coordinator Program if the collection is not conducted?** Although HUD provides a grant program to fund Service Coordinators in Multifamily Assisted Housing, the Department does not know how many properties actually have Service Coordinators. This research will demonstrate the extent of service coordination as well as what difference service coordination makes in providing supportive services to elderly and non-elderly people with disabilities to facilitate independent living and aging in place for residents of HUD-assisted housing.
7. **Are there any special circumstances?** No, there are no special circumstances that require deviation from the general Paperwork Reduction Act standards. This information will not require any of the following: reporting more than quarterly, submission of a written response, submission of any documents, retaining any records, or submission of any confidential information.
8. The Federal Register notice was published on August 24, 2006 (Vol.71, No. 164, Pg. 50081). In total I received four responses; two from providers and two from public interest groups. One response was from Rose Malcolm, Administrator of a HUD assisted property (Peace Memorial Manor in Downers Grove, IL) that sent a letter describing the important role that service coordination plays in serving their residents. Another response was a telephone call from Rose Jennings, a Project Manager for a HUD assisted property (Eastlake Manor, Chicago, IL) who was so enthusiastic about service coordination and eager about the survey, and she called me to volunteer her participation. I thanked her and explained that participants will be randomly sampled when we do receive permission to conduct the telephone survey. The other two responses I received were from Public Interest Groups representatives (Terry Alton of National Church Residences and Colleen Bloom of the American Association of Homes and Services for the Aging). Both public interest group representatives expressed interest in reviewing the survey and offered to solicit participation from their membership. I provided them the draft version of the survey for review, and received no subsequent comment.
- Also, prior to publication in the Federal Register, four consultants external to HUD pre-tested the instrument. These consultants have direct knowledge of HUD's Service Coordinator Program as they manage properties or grant programs that provide service coordination to HUD Multifamily Assisted Housing residents. The four consultants were Donna Thurman, Volunteers of America; Rosemary Horstman, Catholic Charities; Cristina Lopez, South Florida, Elderly Housing Development and Operations; and Terrie Alton, National Church Residences. The survey design was pre-tested via telephone. Feedback from the consultants was used to refine the design of the study and assess the availability of data, frequency of collection, the clarity of instructions and recordkeeping, and level of disclosure. For example, based on their recommendations, the introduction of the survey was modified to explain that the purpose is to evaluate the HUD Service Coordinator Program, rather than to monitor job performance. Furthermore, external consultation led to modification of questions and instructions that were vague.
9. **Is there any payments or gifts to respondents, other than remuneration of contractors or grantees?** There is neither payment nor gifts to respondents nor remuneration to contractors. Rather, participation in this study is voluntary and HUD staff will conduct data collection "in-house."
10. **Is there any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy?** The survey will be administered to a statistical sample of properties that are eligible for the Service Coordinator Program. The confidentiality of participants' information will be protected by the research team composed of staff from the Office of Policy Development and Research, who is responsible for the administration and analysis. Specifically, HUD's trained research team will collect the information, and will protect the identity and responses of the participants selected for this study. The final report will consist of a synthesis of information collected and results, but will not disclose the identity or identifying information from study participants.

11. **Are any questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private?** No, this study does not contain any questions that are considered sensitive.

12. Estimate public burden: number of respondents, frequency of response, annual hour burden.

A	B	C	D	E	F	G
Number of Respondents	Burden per Respondents (Minutes)	Total Annual Burden (Minutes)	Number of Responses	Total Respondent Burden (Minutes)	Total Burden per Respondent	Total Project Burden (Hours)
		(A*B)		(C*D)	(B*D)	
400	30	12,000	1	12,000	30	200

13. **Estimate of the annual cost to respondents or record keepers.** There is no cost to respondents, other than the time required to respond to the survey.

14. **Estimate annualized costs to the Federal government.** The total cost to the federal government for the telephone survey of HUD Multifamily property managers of properties that are eligible for the Service Coordinator Program is \$0. Rather, HUD staff will conduct information collection and analysis “in-house.”

15. **Explain any program changes or adjustments.** This submission to OMB is a new request for approval; there is no change in burden.

16. **Outline plans for publication.** The findings of this survey will be published electronically on HUD’s Internet. We estimate that within a year of data collection, once analysis is complete and the report is reviewed internally, a summary of the findings will be made publicly available via the Office of Policy Development and Research’s Internet site called HUDUSER.

17. **Explain any request to not display the expiration date.** The display of an expiration date for OMB approval of the information collected does not affect the collection of information for this study.

18. **Explain each exception to the certification statement identified in item 19.** Information collected encompassed by this request complies with 5 CFR 1320.9 without exception.

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## B. Collections of Information Employing Statistical Methods

Data collection is scheduled to be conducted in January 2007. The survey will be conducted by HUD’s trained project research staff, who will administer the survey and compile the database of survey responses for analysis purposes. Each record will be assigned a unique identifier. Analysis will begin in April 2007 and a final report will be completed by July 2007.

The primary objectives of this analysis are twofold. First, through developing an estimate of the number of eligible projects that actually have service coordinators, this study will assess the availability of service coordination for residents of Multifamily Assisted Housing. Second, to better understand what difference service coordination makes in providing supportive services to elderly and non-elderly people with disabilities living in HUD-assisted housing, this study will provide some evidence of the importance of service coordination for aging in place. Furthermore, for those properties that do not have HUD-funded service coordinators, we will identify the following information: (1) if they are providing service coordination, (2) why or why not, and (3) if they are providing service coordination, how they are paying for

it. Overall, this study will provide important information about the extent and impact of service coordination that is not otherwise available from HUD records.

A database will allow for a variety of analysis approaches, including:

- Summary of project characteristics including project size, program type (such as Section 202, Section 263, Section 221(d)(3) BMIR, etc.), resident characteristics (elderly, non-elderly disabled),
- Summary of service coordination offered by program type, project size, resident characteristic.
- Assessment of number of service coordinators, funding type for service coordination.
- Assessment of the property managers' views will provide some evidence of the importance of service coordination in facilitating independent living and aging in place for residents of HUD-assisted housing.