

Part A

Justification

A1 Circumstances That Make the Collection of Information Necessary

The U.S. Department of the Housing and Urban Development (HUD) is beginning an important national study of Disaster Housing Assistance Program (DHAP) families transitioning from stepped-up rents (i.e., Phase I) and \$0 rent (i.e., Phase II/Phase III) to market rate or assisted housing. The study is currently being conducted by a combination of HUD staff and Abt Associates Inc. HUD has engaged Abt Associates Inc to conduct the sampling of the Disaster Housing Assistance Program (DHAP) Phase I/II/III families and to assist the sample of 12 DHAP PHAs with consent form and baseline survey administration. The sampling, consent form, and baseline questionnaire administration is the first part of a larger DHAP Incremental Rent Transition (IRT) Study, which will be an outcome evaluation of the incremental rent aspect of DHAP. HUD expects to engage a contractor to conduct the rest of the DHAP IRT Study, including a 12-month follow-up telephone survey with the sample of DHAP Phase I/II/III families, by September 30, 2009. Marina L. Myhre, Ph.D., a Social Science Analyst in HUD's Office of Policy Development and Research, is the current project director of this initial data collection. She will serve as the Government Technical Representative (GTR) of the study once a contract is awarded to a contractor. Although it is unusual for HUD to seek study participants' consent to participate in a research study that has not yet completely been awarded to a contractor, but HUD is in an interesting position in that that study participants are not HUD clients and HUD will no longer have any access to the study participants (DHAP Phase 1, Phase II, and Phase III families) after DHAP ends on February 28, 2009.

The DHAP program presents a unique opportunity to track families transitioning from stepped-up rents (i.e., Phase I) and \$0 rent (i.e., Phase II/Phase III) to market rate or assisted housing and to measure outcomes over time. Both Phase I and Phase II/Phase III of DHAP are time-limited, ending in March 2009. We suggest using FEMA data and Disaster Information System (DIS) data to measure initial differences between Phase I and Phase II/Phase III families and using hits on National Change of Address (NCOA) database and Public and Indian Housing Information Clearinghouse (PIC) (for families that become HUD-assisted families after DHAP ends) every six months to track outcomes for Phase I and Phase II/III families. We will do the data tracking internally at first. We then propose having contractors conduct a telephone survey of a sample of the Phase I and Phase II/III families 12 months after the February 28, 2009 program end date, to identify if there are different outcomes for these two groups of families. This study would enable the Department to answer the question of how does one transition people most effectively from rental assistance to market rate housing after a disaster. Additionally, since DHAP differs from the regular Housing Choice Voucher (HCV) program, HUD wants to observe if DHAP

vouchers and their differential rents are having a different effect on housing, employment, education, health, and other outcomes after DHAP ends February 28, 2009.

Since its inception, approximately \$565 million has been given to HUD from the FEMA Disaster Recovery Fund to administer DHAP. Twelve PHAs have received most of the funding to serve almost 74 percent of HUD's DHAP families. It is these 12 PHAs that will be the focus of this outcome evaluation.

Although the Office of Management and Budget has not conducted a Program Assessment and Rating Tool (PART) review of DHAP, there is national interest in knowing which approach to disaster housing is most effective. As a result, the Department commissioned HUD's Office of Policy Development and Research to evaluate the hypothesized differential impact of the transition from stepped down rents to market-rate rents as compared to the transition from \$0 rent to market-rate rent for the DHAP Phase I and DHAP Phase II/III families in terms of housing, income, employment, and other outcomes.

The DHAP Incremental Rent Study will provide HUD with comprehensive information about the impact of different disaster housing assistance rent schedule strategies. In this regard, the study will serve several goals. First, it will provide more detailed information on the characteristics of families affected by Hurricanes Katrina and Rita, the specific services they receive from PHAs and case management contractors, and the short-term outcomes realized from the differential rent transition models. Second, it will enable HUD to take advantage of a conducting a study on DHAP that has far-reaching implications for how the federal government responds to the housing needs of families affected by any future disasters. Third, granting emergency clearance for the DHAP Incremental Rent Study Consent Form and Baseline Data Collection Form will enable HUD to conduct a follow-up telephone survey of the study participants to look at longer-term outcomes of the differential rent schedule strategies.

This information collection is authorized under Title 12, Sec. 1701z-1 seq. A copy of the legislation is included.

A2 How and by Whom the Data Will Be Used

A2.1 Project Overview

The study is designed to gather statistically accurate information on outcomes realized by DHAP Phase I/II/III families who consent to participate in the DHAP Incremental Rent Study. Up to 12 PHAs and their case management contractors receiving DHAP funding will be recruited to participate voluntarily in the study. In turn, these agencies will be asked to seek the voluntary participation of all of their DHAP Phase I/II/III families over an eight-week period, with the goal of recruiting 1,500 Phase I and 1,500 Phase II/III families.

The data collection has two main components: **baseline questionnaire** for study participants (included with the **consent form** in this OMB expedited clearance request) and **follow-up telephone surveys** on for study participants (to be included in a subsequent OMB clearance request).

Each family participating in the study will be asked to complete a baseline questionnaire at the time they are enrolled in the study. The questionnaire collects basic information on the client's household composition and demographics, finances and income, housing status and cost, employment status, reasons for participating in DHAP, and expected housing after DHAP ends.

The study is also designed to allow for a follow-up telephone survey of study participants approximately 12 months following their enrollment in the study to gather further information on the outcomes realized. When conducted, the follow-up telephone survey will be the subject of a separate submission for OMB clearance.

Management of the consent forms and baseline questionnaires will be the responsibility of Marina L. Myhre, Ph.D., Social Science Analyst, Program Evaluation Division, Office of Policy Development and Research, U.S. Department of Housing and Urban Development. Dr. Myhre will also serve as the Government Technical Representative once the study contract is awarded, expected award date September 30, 2009. Once the contract is awarded, the private research firm that HUD expects to select as the contractor, will manage the consent forms, baseline questionnaires, National Change of Address (NCOA) and any Public and Indian Clearinghouse (PIC) data (if applicable), and follow-up telephone survey. Contingent upon OMB approval, the consent form and administration of the baseline questionnaire will be conducted over an 8-week period, beginning in January 1, 2009. Subsequent OMB clearance packages will address the tracking data collection of study participants in NCOA and PIC and the follow-up telephone survey 12 months after study participant enrollment.

A2.2 Purpose of the Data Collection

The proposed study will fulfill two important needs for HUD and the disaster housing response field. Initially, it will provide systematic information on the outcomes realized by disaster housing assistance recipients and how these outcomes vary with the characteristics of clients, the services they receive, and the market-rate rent transition strategy they are subject to. Further, this important study will lay the groundwork for disaster housing policy discussions and the design of any subsequent disaster housing assistance programs.

A2.3 Who Will Use the Information

HUD staff will use the information collected through the baseline questionnaires and service tracking surveys to better understand the efficacy of disaster housing assistance and thereby inform their efforts to support this industry. HUD staff will be able to inform FEMA staff on the outcomes of the differential rent transition strategies and how to design future disaster housing

assistance programs. HUD will also use the information to meet any future PART requirements for DHAP and to inform any future PART evaluations of DHAP, DHAP Ike, or subsequent disaster housing assistance programs. The PHAs that participate in the study will also be able to use the study results to improve their disaster housing response efforts. Finally, the disaster housing industry will also be able to use the study’s findings to inform policy debates on issues affecting the industry and the design of future disaster housing assistance programs.

A2.4 Instrument Item-by-Item Justification

Exhibit A-1 describes the target respondents, content, and reason for inclusion of each set of questions in the baseline questionnaire. A copy of the complete baseline questionnaire is included in the Appendices. Exhibit A-2 provides a crosswalk of the baseline questionnaire to data that is gathered in DIS, TAAG, PIC, and the follow-up telephone survey.

Exhibit A-1. Item-by-Item Justification of Data Collection Instruments

Question(s)	Respondents, Content, and Reason for Inclusion
<p>Baseline Questionnaire</p>	<p>Respondents: DHAP Phase I/Phase II/Phase III Families</p> <p>Content:</p> <ul style="list-style-type: none"> • Housing history of DHAP families • Current and expected future housing situation of DHAP families • Displacement and movement from disaster(s) • Financial and income characteristics of DHAP families • Demographic characteristics of DHAP families • Assessment of DHAP families’ experience with DHAP case management <p>Reason: To provide information on the family’s baseline circumstances at the time they seek case management prior to DHAP termination, which can then be related to the outcomes that are realized.</p>

A3 Use of Improved Technologies

The baseline questionnaires will be administered as paper and pencil surveys, while the tracking of study participants will be conducted through NCOA, PIC, and an internal HUD database created to collect and store the information collected on study participants.

A4 Efforts to Avoid Duplication

The consent form and baseline questionnaire have been checked against TAAG and DIS for duplicate client information so as to minimize any duplicate questions. Exhibit A-2 identifies the specific items in the consent form and baseline questionnaire that study participants are also

required to report to HUD through any PHA or PHA case management contractor staff as reported in Tracking At A Glance (TAAG) or DIS. To the extent possible, the data fields in the baseline questionnaires and service tracking surveys have been designed to match the fields required by HUD in TAAG, DIS, and PIC (if subsequently applicable after DHAP termination date).

In implementing the study we will work closely with the participating PHAs to determine the most efficient means of collecting the items that are required by HUD and avoiding duplication with TAAG, DIS, or PIC.

A5 Involvement of Small Entities

Many PHAs are small entities. Efforts have been made to minimize response burden through careful design of the data collection strategy and efficient construction of the data collection instruments. In addition, to limit the burden on PHAs, the sampling frame for PHAs to be selected for inclusion in the study is limited to those PHAs serving at least 600 DHAP clients annually in at least one of the categories of clients that are the focus of this study.

The cutoff of 600 clients was derived as part of the sampling plan to assure that the sampled agencies would have a sufficient volume of clients to merit including them among the agencies selected for enrolling the outcome panel and to ensure that the PHAs were large enough so that administering the consent form and baseline questionnaires to a sample of approximately 250 of their DHAP clients would not be an overwhelming burden. Twelve PHAs serve at least 600 DHAP clients annually in at least one of the DHAP phases and those 12 PHAs account for 75.26% of all DHAP clients served or 23,985 out of a total of 31,870 clients (as of December 1, 2008). The number of DHAP clients ranges from 615 to 6,661 clients, with an average of approximately 2,665 DHAP clients per PHA.

A6 Consequences of Less Frequent Data Collection

The baseline questionnaire is only completed once by newly enrolled study participants. The service tracking that this study would like to conduct on the study participants will be done via the National Change of Address (NCOA) database, and HUD's internal HUD's internal Tracking At A Glance (TAAG) database that tracks all case management contacts with all DHAP families, Disaster Information System (DIS) database, the Public and Indian Housing Information Clearinghouse (PIC) if applicable. A future OMB clearance request will address the tracking of enrolled study participants through those databases for the remainder of the study period.

A7 Special Circumstances

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320.6 (Controlling Paperwork Burden on the Public—General Information Collection Guidelines). There are no special circumstances that require deviation from these guidelines.

Exhibit A-2. Crosswalk between HUD Required Data Elements (DIS, TAAG, and PIC) and Data Collected by the DHAP Incremental Rent Study

Data Elements Included in DHAP Incremental Rent Study	Consent Form¹	Baseline Questionnaire	Disaster Information System (DIS)	Tracking At A Glance (TAAG)	PIC (if applicable in future)	Follow-up Telephone Survey
Agency Profile – Data Elements:						
PHA Code			X	X	X	X
DHAP Client-Level Data Elements:						
Study Assigned Confidential Client ID	X	X				X
Client First Name	X		X	X	X	X
Client Last Name	X		X	X	X	X
Client Street Address, City, Zip	X		X	X	X	X
Client Phone Number	X		X	X	X	X
Client Social Security Number	X		X	X	X	X
Client Date of Birth	X		X	X	X	X
Client Street Address, City, Zip prior to hurricane		1				
Client DHAP, Case Mgmt, Counseling History		22, 23, 24	X	X	X	
Client Gender		13	X	X	X	X
Client Age		14	X	X	X	X
Client Race		16	X	X	X	X
Client Ethnicity		15	X	X	X	X
Client Housing History		3	X	X	X	X
Client Future Housing Expectations		4, 5, 6,7	X	X	X	X
Client Housing Moves		2	X	X	X	X
Client Marital Status		9	X	X	X	X
Client Highest Education		10	X	X	X	X
Client Employment Status		11		X	X	X
Client Dependents		12	X	X	X	X
Household Gross Monthly Income		17	X	X	X	X
Household Finances and Credit		18, 19, 20,121	X	X	X	X
Client Future Housing Payment Ability		8			X	X

¹ Items on the consent form are not numbered; an X indicates that this item is collected on the consent form, follow-up telephone survey, or in HUD’s DIS, TAAG, or PIC systems.

A8 Consultations Outside the Agency

In accordance with the Paperwork Reduction Act of 1995, HUD will publish a notice in the Federal Register on or around December 15, 2008 announcing the agency's intention to request an expedited OMB review of data collection activities for the Disaster Housing Assistance Program (DHAP) Incremental Rent Study. The notice provides a 14-day period for public comments.

HUD's Office of Policy Development and Research developed the data collection instruments in consultation with staff from HUD's Office of Public and Indian Housing. Pre-testing of the baseline questionnaires and service tracking surveys with up to nine DHAP clients will occur in December 2008.

A9 Payments to Respondents

DHAP Phase I/ II/ III clients are being offered a \$15 monetary incentive to complete the baseline questionnaire. They will also be offered an additional \$15 monetary incentive to complete the follow-up telephone survey in 12 months, which will be part of a future OMB clearance package. The 12 participating PHAs are being offered a \$10 monetary incentive per DHAP Phase I/II/III family that completes the baseline questionnaire, which is approximately \$10 for 250 randomly selected families for a total of \$2,500 monetary incentive per participating PHA.

A10 Arrangements and Assurances Regarding Confidentiality

HUD does promise confidentiality as stated in the Privacy Act of 1974 (5 U.S.C. 552a), Records Maintained on Individuals. The findings from the study will be publicly reported only at the aggregate level; neither individual DHAP families nor participating PHAs will be identified in the study reports. The System of Records Notice (SORN) for TAAG, listed in FR-5130-N-22 and authority under U.S.C. 552a 88 Stat. 1896; 42U.S.C. 3535 (d) covers the data collected in the baseline questionnaire and the TAAG data used for analysis of outcomes. As per FR-5130-N-22, pg. 21974, "The data stored in this system of records may be used for research and statistical purposes. In such cases, data presented in any research report will be aggregated to a level that does not disclose information that can be used to identify any individual represented in the system.

ROUTINE USES OF RECORDS MAINTAINED IN THE SYSTEM, INCLUDING CATEGORIES OF USERS AND THE PURPOSE OF SUCH USES:

In addition to those disclosures generally permitted under 5 U.S.C. 552a(b) of the Privacy Act other routine uses include:

- (a) To Case Managers—for caseload management and to track the progress and outcomes of individuals enrolled in the DHAP;
- (b) To PHAs to monitor outcomes and monitor case management activities being provided at the local level;
- (c) To FEMA—quarterly data reporting as required under the IAA to monitor program activities at the national level;
- (d) To HUD or individuals under contract, grant or cooperative agreement to HUD, to monitor PHA efforts and compliance requirements, facilitate technical assistance and for research and evaluation of national program outcomes...”

A11 Sensitive Questions

The consent form asks for the study participant’s name, address, social security number, telephone number, and email address, as well as the name, address, telephone number, and email address of two additional contact people. The surveys do not contain questions that are considered sensitive. The surveys contain questions on race/ethnicity, gender, marital status, number of dependents, income, current employment status, education level, whether U.S. born, whether English is primary language, monthly rent paid, and monthly utilities paid. These are not considered sensitive questions, as they are common to most policy research and do not (with the rare exception of income) elicit negative reactions from respondents. The findings from the study will be publicly reported only at the aggregate level; neither individual clients nor participating housing counseling agencies will be identified in the study reports.

A12 Estimate of Annualized Burden Hours

Exhibit A-3 provides information on the estimated time to complete the consent form and baseline questionnaire. The consent form and baseline questionnaire will be completed by 1,500 Phase I and 1,500 Phase II/III families, with each consent form and baseline questionnaire will require 30 minutes to complete. Thus, total burden hours will be 750 hours for Phase I families and 750 hours for Phase II/III families for a total of 1,500 hours for all DHAP clients agreeing to participate in the study. In addition, the 12 participating DHAP PHAs or their case management contractor staff will be assist in administering the consent form and baseline questionnaire to each of these 3,000 DHAP families, with an average of 30 minutes per family required to administer the consent form and baseline questionnaire over the eight-week period. Although the sample of DHAP Phase I/II/III respondents will be drawn randomly from the universe of DHAP Phase I/II/III clients at those 12 DHAP PHAs, a rough estimate is that each DHAP PHA will have an average of 250 study respondents. Thus, the estimated total burden per agency will be 7,500 minutes or 166.5 hours. Across all 12 agencies the total burden

hours for DHAP PHAs to administer the consent forms and baseline questionnaires for DHAP Phase I/Phase II/Phase III families will be 1,500 hours. Overall, the total burden for the participating DHAP families and PHAs will be 3,000 hours.

Exhibit A-3. Respondent Burden

	A	B	C	D	E	F	G
Type of Respondent	Number of Respondents	Frequency of Responses	Average Burden per Respondent (Minutes)	Total Responses	Total Burden per Respondent (Minutes) (B*C)	Total Respondent Burden (Minutes) (C*D)	Total Respondent Burden (Hours) (F/60)
DHAP Phase I	1,500	1	30	1,500	30	45,000	750
DHAP Phase II/III	1,500	1	30	1,500	30	45,000	750
PHAs – Consent Form with Baseline Questionnaire	12 PHAs	250	30	3,000	7,500	90,000	1,500
Total	3,012	253	90	6,000	7,560	180,000	3,000

A13 Estimated Record Keeping and Reporting Cost Burden on Respondents

There is no cost to DHAP Phase I/II/III respondents, other than the time required to respond to the survey. There is a cost to the 12 participating PHAs in terms of the time required to administer the consent form and baseline questionnaire to the approximate randomly sampled 250 DHAP Phase I/II/III families that will be asked to participate in the study. This burden is approximately 125 hours per PHA (30 minutes for each of the approximately 250 DHAP Phase I/II/III families sampled per PHA). As a token of appreciation to the PHAs for participating in this study, HUD will provide an incentive payment of \$10 per DHAP Phase I/II/III family that participates in the study to each participating PHA, for a total incentive payment of approximately \$2,500 to each PHA.

A14 Estimated Cost to the Federal Government

The total contracted cost to the federal government for this initial consent form administration and baseline questionnaire data collection for the DHAP IRT Study is expected to be \$135,000. The total contracted cost to the federal government for the complete DHAP IRT Study, contract to be awarded by September 30, 2009, is \$800,000.

A15 Reasons for Changes in Burden

This submission to OMB is a new request for approval; there is no change in burden.

A16 Tabulation Plan, Statistical Analysis, and Study Schedule

Data collection for the first phase of this study (administering of consent forms and baseline questionnaire) is scheduled to begin in January 2009 and continue through February 2009 if necessary. Responses to the baseline questionnaire will be compiled into a database on characteristics of families, to which HUD staff or future HUD contractor staff will add the services the study participants received from TAAG, client information from DIS, any data from PIC if applicable, and the outcomes identified through the follow-up telephone survey.

Analysis of these data will consist of tabulations of information on clients, services, and outcomes. In analyzing findings from the outcome panel, key stratification variables will be the type of market-rate rent transition intervention (stepped-up rent or \$0 rental assistance to market-rate rent at DHAP program termination), PHA characteristics, and clients' race/ethnicity, income, credit score, household type, and employment status at intake with respect to their market-rate rent transition intervention.

Multivariate analysis will be also used to examine the influence of client, PHA, and service characteristics on the outcomes realized. The goal of this analysis will be to shed light on which market-rate rent transition intervention is more likely to result in favorable participant outcomes. For Phase I families, these favorable outcomes would include ability to pay market-rate rent starting March 1, 2009. For Phase II/III families, favorable outcomes would include being able to pay market-rate rent starting March 1, 2009 or apply for and receive rental assistance if qualified through HUD's Housing Choice Voucher (HCV) program.

The Department expects a private research firm to be under contract to continue data collection, study participant tracking, and data analysis by September 30, 2009. The Department expects to conduct its own participant sample tracking through checks of NCOA and PIC from March 2009 to September 30, 2009. The Department expects the private research firm awarded the study contract to conduct study participant tracking, administration of the follow-up telephone survey, and data analysis to be conducted from September 30, 2009 through October 2011, with a first draft report submitted to HUD in December 2010, and a final report submitted in June 2011.

A17 Expiration Date Display Exemption

All data collection instruments will prominently display the expiration date for OMB approval.

A18 Exceptions to Certification

This submission describing data collection requests no exceptions to the Certificate for Paperwork Reduction Act (5 CFR 1320.9).