

OMB Clearance Package

Quality Control for Rental Assistance Subsidy Determinations

Section A. Justification

Submitted by:

**Office of Policy Development and Research
Department of Housing and Urban Development
Washington, DC 20410**

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A. JUSTIFICATION

1. *Circumstances that make the collection of information necessary*

Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

Introduction

The U.S. Department of Housing and Urban Development (HUD) has been conducting comparable Assisted Housing Quality Control (QC) error measurement studies since 2000. The findings from the most recent study (for Federal FY 2008) indicate that subsidies for at least 37 percent of households receiving assistance through the Public Housing and Section 8 programs contain some type of error resulting in \$91 million dollars in net annual erroneous payments. This is a great improvement over the findings from the 2000 study according to which at least 56 percent of the subsidies for households receiving housing assistance contained some type of error resulting in more than \$1 billion in net annual erroneous payments. HUD continues to need information that will help sharpen its management efforts to correct the most serious of such errors and meet the requirements of the Improper Payments Act of 2002.

The quality control studies will provide HUD with updated estimates on the type, severity, and cost of errors in the income certification and recertification, and rent calculation process. It will also analyze changes in the type and severity of such errors since the previous studies. This information, along with other HUD efforts, will provide HUD with mechanisms to improve determinations of assisted-housing tenants' income, rent, and subsidy amounts. HUD will use the findings from this study to focus efforts on correcting the most serious errors and determine the effectiveness of corrective measures.

Authorization to Collect Information

The collection of survey data by HUD is authorized under the Housing and Urban Development Act of 1970 (12USC 1701z-1):

Sec. 501. The Secretary of Housing and Urban Development is authorized and directed to undertake such programs of research, studies, testing, and demonstration relating to the mission and programs of the Department as he determines to be necessary and appropriate.

Sec. 512(g). The Secretary is authorized to request and receive such information or data as he deems appropriate from private individuals and organizations, and from public agencies. Any such information or data shall be used only for the purposes for which it is supplied, and no publication shall be made by the Secretary whereby the information or data furnished by any particular person or establishment can be identified, except with the consent of such person or establishment.

Sec. 210 of the Housing and Community Development Amendments of 1979 states—

The Secretary shall establish procedures which are appropriate and necessary to assure that income data provided to public housing agencies and owners by families applying for or receiving assistance under this section is complete and accurate. In establishing such procedures, the Secretary shall randomly, regularly, and periodically select a sample of families to authorize the Secretary to obtain information from these families for the purposes of income verification, or to allow those families to provide such information themselves. Such information may include, but is not limited to, data concerning unemployment compensation and Federal income taxation and data relating to benefits made available under the Social Security Act, the Food Stamp Act of 1977, or title 38, United States Code. Any such information received pursuant to this subsection shall remain confidential and shall be used only for the purpose of verifying incomes in order to determine eligibility of families for benefits (and the amount of such benefits, if any) under this section.

Title I, Section 1, Sec. 8(k) of the Housing Act of 1937 as amended [Public Law 93-383, 88 Stat. 633] (42 U.S.C. 1437) states—

The Secretary shall establish procedures which are appropriate and necessary to assure that income data provided to public housing agencies and owners by families applying for or receiving assistance under this section is complete and accurate. In establishing such procedures, the Secretary shall randomly, regularly, and periodically select a sample of families to authorize the Secretary to obtain information on these families for the purposes of income verification, or to allow those families to provide such information themselves. Such information may include, but is not limited to, data concerning unemployment compensation and Federal income taxation and data relating to benefits made under the Social Security Act, the Food Stamp Act of 1977, or title 38, United States Code. Any such information received pursuant to this subsection shall remain confidential and shall be used only for the purpose of verifying incomes in order to determine eligibility of families for benefits (and the amount of such benefits, if any) under this section.

To further institutionalize Federal agency efforts to eliminate improper payments, the President signed the Improper Payments Information Act (IPIA) of 2002 (Public Law 107-300) into law on November 26, 2002. The central purpose of the IPIA is to enhance the accuracy and integrity of Federal payments. To achieve this objective, the IPIA provides an initial framework for Federal agencies to identify the causes of, and solutions to, improper payments. In turn, guidance issued by the Office of Management and Budget (OMB) in May of 2003 (Memorandum 03-13) requires agencies to: (i) review every Federal program, activity, and dollar to assess risk of significant improper payments; (ii) develop a statistically valid estimate to measure the extent of improper payments in risk susceptible Federal programs; (iii) initiate process and internal control improvements to enhance the accuracy and integrity of payments; and (iv) report and assess progress on an annual basis.

More recent OMB guidance, issued as Part III to OMB Circular A-123, Appendix C (M-10-13), reinforces the need for Federal agencies to reduce improper payments and establish reporting requirements.

2. *Use of information*

Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.

HUD will use the information to identify the amount and source of error and to recommend corrective measures that can be taken to reduce the amount of error in eligibility determinations and rent calculations. HUD and its agents need information concerning the type and severity of errors that are occurring in order to construct effective remedies. If those data are not collected, no assessment as to the amount and type of errors can be made nor can corrective actions be developed and implemented. Without such corrective action it is believed that a portion of HUD findings subsidies will be misused. For example, the FY 2008 study (the most recent study with published findings) found various net payment errors, detailed below.

All summary error estimates represent the summation of net case-level errors. That is, a household is determined to have a net overpayment error, no error, or a net underpayment error. Major findings were—

- Rent Underpayments of Approximately \$433 Million Annually (down from \$524 in FY 2007). For tenants who paid less monthly rent than they should pay (18%), the average monthly underpayment was \$49. For purposes of generalization, total underpayment errors were spread across all households (including those with no error and overpayment error) to produce a program-wide average monthly underpayment error of \$8.74 (\$105 annually). Multiplying the \$105 by the approximately 4.1 million units represented by the study sample results in an overall annual underpayment dollar error of approximately \$433 million per year.
- Rent Overpayments of Approximately \$342 Million Annually (up from \$260 in FY 2007). For tenants who paid more monthly rent than they should pay (18.73%), the average monthly overpayment was \$37. When this error was spread across all households, it produced an average monthly overpayment of \$6.90 (\$83 annually). Multiplying the \$83 by the approximately 4.1 million assisted housing units represented by the study sample results in an overall annual overpayment dollar error of approximately \$342 million per year.
- Aggregate Net Rent Error of \$91 Million Annually. When underpayment and overpayment households are combined, the average *gross* rent error per case is \$37 (\$18 + \$19). Over- and underpayment errors partly offset each other. The *net* overall average monthly rent error is -\$1 (\$18 – \$19). HUD subsidies for Public Housing and Section 8 programs equal the allowed expense level or payment standard minus the tenant rent, which means that rent errors have a dollar-for-dollar correspondence with subsidy payment errors, except in the Public Housing program in years in which it is not fully funded (in which case errors have slightly less than a dollar-for-dollar effect). The study found that the *net* subsidy cost of the under- and overpayments was approximately \$91 million per year (\$433 million – \$342 million).

Subsidy over- and underpayment dollars are summarized in Exhibit A2.1.

**Exhibit A2.1
Subsidy Dollar Error**

Type Dollar Error	Subsidy Overpayment	Subsidy Underpayment
Average Monthly Per Tenant Error for Households with Errors	\$49 (18% of cases)	\$37 (19% of cases)
Average Monthly Per Tenant Error Across All Households	\$9	\$7
Total Annual Program Errors	\$433 million	\$342 million
Total Annual Errors—95% Confidence Interval	\$338–\$529 million	\$259–\$425 million

Exhibit A2.2 provides estimates of program administrator error by program type.

**Exhibit A2.2
Estimates of Error in Program Administrator Income
and Rent Determinations (in \$1,000's)**

Administration Type	Subsidy Overpayments	Subsidy Underpayments	Net Erroneous Payments	Gross Erroneous Payments
Public Housing	\$90,597	\$92,708	-\$2,111	\$183,305
PHA-Administered Section 8	\$244,919	\$175,329	\$49,589	\$400,248
Total PHA Administered	\$315,515	\$268,037	\$47,478	\$583,553
Owner-Administered	\$117,783	\$73,940	\$43,844	\$191,723
Total	\$433,299	\$341,977	\$91,322	\$775,276
	(+/- \$95,678)	(+/- \$83,073)	(+/- \$92,546)	(+/- \$153,447)

3. *Information technology*

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.

Automation of tenant data collection. We will continue to use the computer-assisted data collection technology developed for the 2000 study (data was collected for actions taken in 1999 and early 2000) and enhanced for the FY 2003 through FY 2009 studies to gather nearly all of the data from project files and tenants. Our field staff will use laptops with modules designed specifically for selecting the tenant sample, abstracting tenant file data (including the 50058/59), and interviewing the tenant. In addition, automated tracking and data monitoring systems will ensure that the data and supporting paper documents are collected and accurate. This approach offers the following advantages:

- More objective data collection. QC field staff will apply a consistent set of procedures, questions, and probes. Branching and skip patterns applied by the system will prevent field

staff from mistakenly skipping sections, omitting questions, or asking the wrong questions during the tenant interview.

- Onsite editing of abstraction and interview data. The computer-assisted data collection process will apply logic, consistency checks, and computational checks on all information provided.
- Monitoring of field staff's productivity and accuracy. Field data, uploaded daily, will be monitored by ICF Macro's field supervisors for accuracy to assure HUD of high-quality data at a reasonable cost.

4. *Efforts to identify duplication*

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 2 above.

There is no duplication of the data to be collected in this study.

5. *Minimization of burden on small entities*

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

Procedures for the data collection at the primary participating entities (i.e., PHAs and owners) have been designed to minimize burden as much as possible. Since the data must be collected in a consistent manner, no special procedures are possible for small entities. Due to the structure of the smaller entities, it is likely that fewer staff members will have to be contacted at the smaller entities since one staff member will likely have the responsibility for several management areas (and therefore be able to answer questions about them) while in larger agencies several staff may have to be contacted to obtain all the required information.

The only other small entities involved in this study might be a small business at which a tenant is employed, therefore requiring verification from the employer. A verification request requires only a small amount of information so the burden on any one employer will be small. We do not anticipate that any one small employer is likely to have more than one sample member in their employ.

6. *Consequences of not collecting the information*

Describe the consequences 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.

If this data collection did not occur, HUD would be in violation of the Improper Payments Information Act (IPIA) of 2002 (Public Law 107-300). The central purpose of the IPIA is to enhance the accuracy and integrity of Federal payments. To achieve this objective, the IPIA provides an initial framework for Federal agencies to identify the causes of, and solutions to, reducing improper payments. In turn, guidance issued by OMB in May of 2003 (Memorandum 03-13) requires agencies to: (i) review every Federal program, activity, and dollar to assess risk

of significant improper payments; (ii) develop a statistically valid estimate to measure the extent of improper payments in risk susceptible Federal programs; (iii) initiate process and internal control improvements to enhance the accuracy and integrity of payments; and (iv) report and assess progress on an annual basis. More recent OMB guidance, issued as Part III to *OMB Circular A-123, Appendix C (M-10-13)*, reinforces the need for Federal agencies to reduce improper payments and established reporting requirements

7. *Special circumstances*

Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; 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 and require the use of a statistical data classification that has not been reviewed and approved by OMB.

For two of the data collection instruments – the Project Specific Information Form, and the Project Staff Questionnaire, we request written responses in fewer than 30 days from receipt. While we could provide a longer response time, and some PHA/projects take longer to complete the documents, we find respondents pay more attention to the request if the response time is shorter rather than longer.

8a. *Federal Register notice*

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor'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 sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

In accordance with the Paperwork Reduction Act of 1995, HUD published a notice in the Federal Register announcing the agency's intention to request an OMB review of data collection activities for the Quality Control for Rental Assistance Subsidy Determinations. The notice was published on April 8, 2010, in Volume 75, Number 67, pages 17,942–17,943 and provided a 30-day period for public comments. A copy of this notice appears in Appendix A. No public comments were received regarding this notice.

8b. *Consultation with persons outside the agency*

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure or reporting format, and on the data elements to be recorded, disclosed or reported. Explain any circumstances which preclude consultation every three years with representatives of those from whom information is to be obtained.

ICF Macro worked with the consultants listed below, all of whom are fully conversant with the HUD programs included in the study and the policies and procedures of those programs.

Judy Lemeshefsky
Independent Consultant
Former lead Occupancy expert at HUD headquarters for the Office of Housing.
Phone Number: 703-670-5033

Judy Payne
Independent Consultant
Former Executive Director of two housing agencies, and a not-for-profit housing and development agency.
Phone Number: 208-866-4780

9. Payments or gifts to respondents

Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift is provided to respondents.

10. Confidentiality

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

All ICF Macro and data collection staff are required to sign a data confidentiality pledge associated specifically with this study. A copy of this pledge is located on the following page.

In addition, the Household Interview Consent Form (found on page 10), read to the tenant prior to the interview, includes a statement regarding confidentiality. It reads as follows:

Confidentiality. All information collected during this study will be kept confidential by the individual field interviewers who conduct the interviews. The information is transferred to secure computer systems at the study headquarters. The information will not be shared directly with staff at your local housing project. However, individual level information is provided to HUD headquarters in Washington, DC. This information is matched with centralized national databases such as Social Security files that contain information on the income received by individuals throughout the United States. The confidential information collected during this study is protected under the Privacy Act (5 U.S.C. 522a). Disclosure of any confidential information may be subject to criminal sanctions imposed by 18 U.S.C 641.

Confidentiality Pledge and Non-Disclosure Statement

I, _____, in my role as an employee of Aspen of DC, working as a Field Interviewer for the Quality Control for Rental Assistance Subsidy Determinations Study, HUD/ICF Macro contract GS-23F-9777H (Task Order #: CHI-T0001; C-CHI-01026), understand and agree to comply with the following:

- **Confidentiality of Data.** All information I obtain, from either formal interviews or in casual observation or conversation, will be treated as confidential and not discussed with any parties not authorized to have access to such data, including (but not limited to) project/PHA staff, other households I may contact, and HUD staff.
- **Support for Goals of Study/Objectivity.** I support the goals of this study and will collect, to the best of my ability, complete and accurate data, and will report the data objectively and without regard to how it might affect the results of this study. I will be objective in all dealings with study participants. I will voice no opinions I may have about assisted housing, assisted housing tenants, and how assisted housing programs are administered, and I will not discuss them with any study participants (including PHA/project staff and households).
- **Treatment of Hardcopy Documents.** All information I obtain from hardcopy documents will be treated as confidential and not discussed with or shown to any parties not authorized to have access to such information, including (but not limited to) project/PHA staff, other households I may contact, and HUD staff. All paper documents that contain any information specific to a household or household member will be sent to ICF Macro as instructed. No copies of documents with confidential information will be retained after data collection is completed.
- **Non-Disclosure of Sensitive Data.** I understand that I may have access to sensitive information that is protected under the Privacy Act (5 U.S.C. 522a), which must not be disclosed to unauthorized persons. Any government information made available to me, as a member of the project team, shall be used only for the purpose of carrying out the requirements of this project and shall not be divulged, or made known in any manner, to any person who is not a member of the project team, without written authorization from the project director. I understand that disclosure of any confidential information, by any means, for a purpose or to any extent unauthorized herein, may subject me to criminal sanctions imposed by 18 U.S.C 641.
- **Reporting of Disclosures.** I shall promptly and immediately report to my field supervisor any knowledge of uses, transmissions, losses or other disclosures (whether intentional or unintentional) of data that are not in accordance with this agreement or applicable law. In addition and to the maximum extent practical, I shall assist in mitigating any harmful effect of any unauthorized use or disclosure of such data.

My signature below signifies my understanding of, and agreement with the above stipulations.

Field Interviewer Signature: _____
Date: _____

11. Justification of questions

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; include 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.

Almost all questions in the tenant questionnaire concern household income and expenses and certain characteristics of household members, all of which could be considered to be sensitive topics. Because the purpose of the study is to measure error in rent and eligibility determinations, and such determinations are based on household income, expenses, and certain characteristics (e.g., tenant disability or elderly status, number of dependents), those questions are absolutely necessary to conduct the rent calculations.

Before the in-person tenant interview, the field interviewer will read aloud the following consent form.

**Department of Housing and Urban Development
Quality Control for Rental Assistance Subsidy Determinations Study
Household Interview Consent Form**

Name of Tenant: _____

C/P/C: ____/____/____

Purpose. You have been selected to participate in a research study being conducted by the United States Department of Housing and Urban Development (HUD). The purpose of this study is to learn more about the types of errors that occur when determining tenant eligibility and monthly rent in HUD programs so that improvements can be made. We will be interviewing 2,400 randomly selected households from all over the United States.

Study Procedures. We have already contacted the staff at the local housing office. They provided your name and allowed us to review the file they created when they determined the amount of rent you pay. Today, I plan to interview you. The interview will take from 40 to 60 minutes. This interview will include questions about who lives in your home with you, income received by your household, and any assets or other expenses you may have. Your responses to the questions will be entered into a laptop computer and transmitted to the study headquarters where the information will be processed.

Risks and Benefits. Participation in this study will not result in any direct benefit to you. The study findings will be used to make HUD program changes that will lead to fewer errors when determining eligibility for housing assistance and calculating the amount of tenant rent. You need to know that if you do not provide complete and accurate information you may lose your housing assistance. Also, you may find that some of the questions are of a personal nature and you may feel uncomfortable answering those questions.

Confidentiality. All information collected during this study will be kept confidential by the individual field interviewers who conduct the interviews. The information is transferred to secure computer systems at the study headquarters. The information will not be shared directly with staff at your local housing project. However, individual level information is provided to HUD headquarters in Washington, DC. This information is matched with centralized national databases such as Social Security files that contain information on the income received by individuals throughout the United States. The confidential information collected during this study is protected under the Privacy Act (5 U.S.C. 522a). Disclosure of any confidential information may be subject to criminal sanctions imposed by 18 U.S.C 641.

Participant Rights. Persons who receive housing assistance from HUD programs are required to participate in this study. You agreed to do so when you signed the rental assistance forms. You need to know that HUD may stop your housing assistance if you choose to not participate in this study or you do not respond to the questions asked during the interview. If you have questions about this study, you can talk with the study director using the toll-free number, 877-392-9776.

Field Interviewer Certification. By signing this document, you are certifying that you read this agreement to the respondent and he/she has

agreed

not agreed

to participate in the Quality Control for Rental Assistance Subsidy Determinations Study.

Field Interviewer Name: _____

Field Interviewer Signature: _____

Date: _____

12. Hour Burden

Estimate of the hour burden of the collection of information.

Four phases of data collection activities with two separate groups of respondents are associated with this study. Phases I and IV entail collecting information from the PHA/owners who represent the project staff that is responsible for administering the assisted-housing programs. Five hundred and fifty PHA/owners will be sampled. In earlier executions of this study, phases I and IV were combined into one phase. With experience we concluded that the data collection is simplified by splitting the one phase into two (i.e., two instruments: a project-specific information form and a project staff questionnaire, administered at two separate times).

Phase II of the data collection has no respondent burden. This phase entails a tenant file abstraction task that the data collector executes on site at the PHA/owner site. The PHA/owner is not asked to conduct any recordkeeping or provide any information that is outside the realm of what would normally be accomplished in administering the assisted housing programs under study.

The second respondent group is that of adult tenants who are members of the sampled households. In phase III, 2,400 households will be interviewed.

Phase I Data Collection Project-Specific Information Form

The project-specific information form is completed by the PHA/owner at the outset of the study. This form, which has four versions based on program type, covers the following topics: project location, project contact information, location of tenant files and requests for specific values needed to calculate tenant rent (e.g., welfare rent, passbook rates, gross rent). The version that is used for the voucher program also contains sections on rent comparability and utility allowances. This form is mailed in paper form to sampled projects for their completion and return. The estimated burden is 550 respondents x 15 minutes = total burden of 8,250 minutes or 138 hours. Copies of the Project-Specific Information Forms and accompanying cover letters are located in Appendix B.

Phase II Data Collection Tenant File Abstraction

Phase II of the data collection has no respondent burden as described above.

Phase III Data Collection Household Interview

This interview will be conducted with one household member from each of the 2,400 sampled households to obtain data concerning income, expenses, and household composition to be used in identifying error. The length of the interview will vary depending on the household's circumstances (e.g., an elderly household with income only from Social Security and no medical expenses would be considerably shorter than an interview with a family in which several members are employed and that has substantial assets or other unusual circumstances). The

estimated range is from 40 to 60 minutes, or an average of 50 minutes. It is not possible to reduce this time since all reasonable income sources must be checked for each household. The estimated burden is 2,400 respondents x 50 minutes=total burden of 120,000 minutes or 2,000 hours. A copy of a paper representation of the computer-assisted personal interview is located in Appendix C. A copy of the letter sent to the tenants informing them of the need to be interviewed is also found in Appendix C.

**Phase IV Data Collection
Project Staff Questionnaire**

The Project Staff Questionnaire is administered on paper (and possibly via a web interface in future studies) to PHA/owner staff during the mid to end of the data collection cycle. This document collects information on the number and types of staff administering the assisted housing programs, staff training and communication of changes in HUD policy, quality control procedures, conduct of tenant interviews, computer automation, and verification procedures. The estimated burden is 550 respondents x 45 minutes = total burden of 24,750 minutes or 413 hours. A copy of the Project Staff Questionnaire and accompanying cover letter are located in Appendix D.

Table A12.1 summarizes the anticipated burden of each of the data collection components.

Table A12.1. Respondent Burden Estimate by Data Collection Phase

Phase	Respondent Group	Data Collection Instrument	Estimated Number of Survey Respondents	Minutes per Respondent	Respondent Burden Hours
I	PHA/owner	Project-Specific Information Form	550	15	138
II	Tenant File Abstraction		No burden		
III	Tenant	Household Interview	2,400	50	2,000
IV	PHA/owner	Project Staff Questionnaire	550	45	413

13. Cost burden

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 to respondents will be the time required to respond to the survey.

14. Annualized costs to Federal Government

Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation expenses (such as equipment, overhead, printing, and support staff), and 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 in a single table.

OMB Clearance is being sought for the FY 2010 data collection effort with the expectation that annual studies will continue to be conducted. Each data collection (i.e., FY study) lasts for approximately 20-months with 95 percent of the cost falling within a one year period. The values provided in Table A14.1 are the total costs to execute the FY 2010 study and include: 1) updating of the instruments, correspondence and administrative forms, 2) development of the sampling plan and project and tenant sample selection, 3) review and documentation of existing HUD policy and the study operationalization of that policy, 4) development of the management and analysis plans, 5) systems programming of the data collection software and tracking systems, 6) study pretest, 7) field interviewer training, 8) data collection, 9) data cleaning and processing, 10) data tabulation and analyses, 11) report writing, and 12) overall project management. These costs were estimated by calculating the number of person-hours required to execute the study tasks and adding the associated other direct costs.

Table A14.1 Cost by Study

Study	Study Timeframe	Cost
FY 2010	February 2010–September 2011	\$4,481,922

15. Program changes or adjustments

Explain the reason for any changes reported in Items 13 or 14 above.

There are no changes to items 13 and 14.

16. Plans for tabulation and publication

For collections of information whose results will be published, outline plans for tabulation 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 primary purpose of the study is to determine the type, severity, and cost of errors associated with income certification and rent calculations. This study will produce national estimates of error in each program and be published in a final report. Fourteen study objectives have been outlined, each having corresponding tabulations and analyses. The analysis plan and table shells for each of the 14 study objectives are located in Appendix E.

The schedule for data collection and reporting is shown in Table A16.1.

Table A16.1. Data Collection and Reporting Schedule

Activity	Time schedule
Project Sample Selection	July 2010
Phase I—Project-Specific Information Mailing	August 2010
Phase II—Tenant File Abstraction	November – March 2010
Phase III—Tenant Household Interview	November – March 2010
Phase IV—Project Staff Questionnaire	November – March 2010
Data Cleaning and Analysis	April - August 2010
Final Report	September 2010

17. *Non-display of expiration date*

If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Approval is not being sought.

18. *Exception to certification statement*

Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB 83-I.

There are no exceptions.