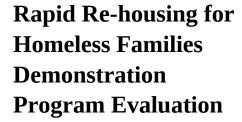
Abt Associates Inc.

From Insight to Impact

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Part A: Supporting
Statement for Paperwork
Reduction Act
Submission

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FINAL

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Part A. Justification

A.1 Need and Legal Basis

A.1.1 Need for Information Collection

The FY 2008 budget for the U.S. Department of Housing and Urban Development (H.R. 2764) included a \$25 million set-aside to implement a Rapid Re-housing for Families Demonstration (RRHD) Program "expressly for the purposes of providing housing and services to homeless families." Also included in the legislation was a requirement that there be an evaluation of the demonstration program "in order to evaluate the effectiveness of the rapid re-housing approach in addressing the needs of homeless families." The Notice of Funding Availability (NOFA) states that "the Rapid Re-housing Demonstration program will include an evaluation phase, which will focus on determining the efficacy of the assessment process and the housing/service intervention related to how successfully households are able to independently sustain housing after receiving short-term leasing assistance."

A primary component of the research design is an outcomes evaluation that will help HUD understand the extent to which program participants obtained and sustained housing, among other outcomes, after exiting the program. The outcomes evaluation will also assess the efficacy of the assessment process. Participation in the evaluation of the rapid re-housing program was a requirement of the grant agreement; therefore, all grantees are expected to be part of the outcomes evaluation.

In order to determine the effectiveness of the demonstration program, it will be necessary to track families who receive assistance to determine if they are successful at maintaining stable housing after they have exited the program. The evaluation design proposes enrolling a cohort of families who enter the rapid re-housing demonstration program within a certain time frame, and administering a follow-up survey to each participating family twelve months after they have exited the program. Participation in the evaluation will be entirely voluntary. The time frame of the study is such that we do not plan to administer a baseline survey to be administered to study participants upon enrollment. Rather, it is expected that baseline data will be established by reviewing existing program administrative data, such as homeless management information system (HMIS) data¹ and any additional information that can be gathered from the assessment tools that programs use to screen families for participation in the rapid re-housing program.

We are seeking clearance of the following items: the participation agreement, including the collection of contact information for those families who agree to participate in the evaluation; the 6-month tracking letter; the 12-month tracking outreach log; and the follow-up survey that will be administered to participating families approximately 12 months after program exit.

¹ HMIS data are existing administrative program data that are covered under a separate OMB clearance.

A.2 Information Users

A.2.1 How and For What Purpose the Information Collected Will be Used

The contact information collected as part of the research participation agreement will be used to locate and track program participants after program exit for the purpose of allowing the research team to find the participating families in order to conduct the follow-up survey.

The follow-up survey is intended to collect outcomes data from RRHD participants in our study cohort 12 months after they exit the program. This data will be analyzed in conjunction with the HMIS data to answer the research questions of the outcomes evaluation. Specifically, it will help answer: 1) where RRHD participants live after the program ends and if they are stably housed, 2) what characteristics or factors contribute to housing stability or lack thereof, and 3) whether participants improve in domains of self-sufficiency, employment, health and well-being.

A.2.2 Who Will Use the Information

The primary beneficiary of the planned data collection will be HUD, which will use the information from the study to assess the effects of rapid re-housing for homeless families. These data will begin to answer HUD's questions about the efficacy of the rapid re-housing model, and inform the field about aspects of the rapid re-housing model that appear to promote housing stability. Secondary beneficiaries of this data collection will be those in the public policy and social science research community who are interested in developing policy initiatives to address homelessness among families. Local service providers and decision makers will also use the data to understand how their programs work and to target resources in effective ways.

The research design for this study does not include the collection of data from a comparison group. Early canvass calls to the 23 grantees confirmed that RRHD sites are not consistently recording information about nonparticipants in their HMIS, and given the limited number of rapid re-housing programs in operation at the start of the grant period, a suitable comparison group was not able to be identified. The implication of this decision is that we will be somewhat limited in our ability to infer whether the outcomes are attributable to the RRHD program. These limitations will be clearly stated multiple times in any publication or other written materials that may be the result of this study in order to ensure that readers are appropriately apprised of the limitations of the study, as well as the boundaries of appropriate use regarding the findings given these limitations.

A.3 Electronic Data Collection

We will build an easy-to-use real-time database where participating programs will be expected to enter contact information for each family. We will use a web interface to collect this data to ensure secure collection and management of personal information. The centralized database will also make it easier to manage the tracking and follow-up survey process, since tracking activities can be prompted from the program exit dates stored in the web database.

Alternative data collection strategies were considered for the contact information, but this approach was considered significantly less burdensome than requiring grantees to modify their HMIS to

accommodate the study data collection needs and to regularly extract contact information for tracking purposes. Thus, we believe that a web-based database will be the most practical, timely, and least burdensome way to collect basic information needed for participant tracking.

The program participant and contact database will be designed with a user-friendly interface and built-in validation checks to optimize data quality. Each site will be able to see the information only for the families assigned to the site. The research staff will be able to access and export information for all the sites. The system will generate a site summary and client detail report for each site. In addition, a report that highlights incomplete entries in the database will be available to authorized users.

The follow-up survey data will be collected over the phone with study participants, as it would not be appropriate or feasible to collect this information through electronic means. However, the telephone survey process will be managed through a CATI electronic interface that helps ensure that data are collected consistently and efficiently.

A.4 Duplication of Similar Information

In order to track families over time, it is imperative that complete and consistent contact data is collected from each participating family. While some of the desired contact information data is already being collected by providers in order to administer the program, the desired information is not being collected in the comprehensive manner required for the purposes of the evaluation, and some data elements, such as the contact information for a friend or relative, is not being collected at all.

The questions incorporated into the follow-up survey data are not currently being collected by any other entity, in particular at 12 months after program exit. To minimize the burden of data collection and cost of the research, the research design does not include a baseline survey and instead relies upon program administrative data that are already being collected. When possible, the research team will compare follow-up survey data with similar questions recorded in HMIS to determine changes in participant status since program exit.

A.5 Small Businesses (Involvement of Small Entities)

N/A

A.6 Less Frequent Data Collection

The RRHD Evaluation will not conduct interviews of program participants at program entry to collect baseline information; therefore, we will rely on RRHD programs to collect client identifiers, program entry and exit dates, and extensive contact information on our behalf. This information will be used to track program participants so that the study will be able to successfully contact them for a follow-up survey 12 months after they exit the program. The proposed research design assumes that the research team can rely on RRHD programs to identify potential families for the study, to collect all needed contact information, and to ask the clients for consent to participate in the study. By definition homeless families are mobile and more difficult to track over time than families who do not

experience homelessness. They have unstable housing patterns and traditional tracking methods are less effective in providing updated location data. If we are unable to collect this data from program participants, the probability of being able to track families for twelve months beyond program exit in order to administer the follow-up survey will be greatly diminished. A tracking letter will be sent to participating families approximately six months after they exit the program asking families to call or send in a contact update card if the contact information has changed.

The initial contact information is only collected one time; therefore less frequent data collection is not an option. The one-time tracking letter does not involve explicit data collection from families and eliminating this step could result in being able to locate fewer families at the time of the follow-up survey. The 12-month tracking outreach log will be used when participants cannot be located directly and the interviewer needs to reach out to the landlord, family, and friend(s) identified by the participant at enrollment. The data collected in the log will be used to support efforts to locate participants and, when possible, to document nominal housing outcomes if the participant cannot be located for the follow-up survey. The follow-up survey is essential to answer the legislative requirement of evaluating the program and understanding its efficacy. The follow-up survey is only collected one time; therefore less frequent data collection is not an option.

A.7 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 circumstances that require deviation from these guidelines.

A.8 Federal Register Notice/ Consultation Outside the Agency

In accordance with the Paperwork Reduction Act of 1995, the Department of Housing and Urban Development (HUD) published a notice in the Federal Register on October 14, 2010. The docket number is FR-5382-N-15 and the document number is FR Doc. 2010-25903. The Federal Register Notice appeared on page 63194. The authority is Section 3506 of the Paperwork Reduction Act of 1995, 44 U.S.C, Chapter 35, as amended. The notice provides a 60-day period for public comments, with comments due by December 13, 2010.

The design of the evaluation of the rapid re-housing for homeless families study was developed and is being implemented with the assistance of Abt Associates Inc., the prime contractor. HUD has collaborated on the design of the evaluation with the Abt Associates team throughout all phases of the study to date. The purpose of such consultation is to ensure the technical soundness and usefulness of the data collection instruments in carrying out the aims of the evaluation.

A.9 Payments to Respondents

There will be no payments to participants who supply their contact information for the purposes of participation in the evaluation. However, incentive payments are a powerful tool for maintaining low attrition rates in longitudinal studies. We propose to enclose a \$2 bill along with the 6-month tracking letter to encourage families to call or send corrected contact information if needed. This is

standard practice in survey tracking and helps to establish credibility and good faith with the study participants, which is expected to lead to greater participation in the follow-up survey. Respondents completing the follow-up survey will receive \$25 for their time. The use of incentive payments for the follow-up survey is proposed to help ensure a high response rate, which is necessary to avoid unbiased outcome results.

A.10 Confidentiality

The subjects of this information collection and the nature of the information to be collected require strict confidentiality procedures. The information requested under this collection is protected and held confidential in accordance with 42 U.S.C. 1306, 20 CFR 401 and 402, 5 U.S.C.552 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act of 1974) and OMB Circular No. A-130. As required by 5 U.S.C. 552a (Privacy Act of 1974), HUD has published a Systems of Record Notice (SORN) in the Federal Register. Detailed plans for informed consent and data security procedures are described below.

A.10.1 Informed Consent

The proposed data collection strategy assumes that the research team can rely on RRHD programs to identify potential families for the study, to collect all needed contact information, and to ask the clients for consent to participate in the study. The consent process will involve reviewing the participant agreement which briefly describes the study, the risks associated with participation, what is being done to mitigate these risks, and what will be expected if the family agrees to participate in the study.

The draft participant agreement is included as Appendix B to this document. Many programs have already planned 6 and/or 12-month outreach to former participants, which also can be used to remind families about the study, to encourage their participation, and to update contact information. Those who agree will sign the participant agreement will be tracked and contacted approximately 12 months after program exit. Some families may decide not to participate in the study; they will still be eligible for services through the RRHD program.

A.10.2 Data Confidentiality Protections

The research team has establish rigorous data security and confidential provisions that are documented as part of the study's Data Security Plan and in the Department's SORN and Privacy Impact Assessment. First, all users will be aware of their responsibilities to protect personal participants' personal information, including the limitations on uses and disclosures of data. From a technology perspective, the research databases will be designed to limit access to data to authorized users with levels of access commensurate with each person's role on the project. The web server hosting the database will be maintained in a secure facility with power back up, network redundancy and system monitoring. The server will be mirrored by an additional 100GB hard disk space. In addition, daily back ups of server will be maintained at the data center and an off site location. We will use Oracle as the backend database with either Coldfusion or J2EE application server. The database and website will be password protected and access will be provided after user authentication. In case of forgotten password, the system will email the password automatically to registered user email address.

A.11 Sensitive Questions

The participation agreement does not include any questions of a sensitive nature.

The follow up survey includes demographic characteristics of the family head (e.g., race/ethnicity, gender, marital status); number of children and other adults in the household (a roster of adults and children with the family head at baseline and spouse/partner and children not with the family head at baseline, and characteristics of these family members); income sources and total family income; employment and earnings for the family head; current housing conditions, rent and rental assistance received; housing history since program completion; barriers to housing; and homeless program participation. Although none of these items are particularly sensitive, they will all be treated as sensitive, confidential information to be used only for the purposes of this study. Respondents will be reminded during the interviews that their responses will be kept confidential, to encourage their candid responses. Respondents will also be reminded that they can refuse to answer any questions with no repercussion.

A.12 Burden Estimates (Total Hours and Wages)

| Form | Respondent Sample | Number of Respondents | Average Time to Complete (Minimum, Maximum) In Minutes | Frequency | Total Burden (hours) |
|-----------------------------------|---|--------------------------|--|-----------|----------------------------|
| Contact Information | All enrolled families (N=1,200) | 1,200 | 5 (3-7) | 1 | 100 |
| Tracking Information | All enrolled families (N=1,200) | 1,200 | 2 (1-3) | 1 | 40 |
| 12-month Tracking Outreach Log | Contacts identified by enrolled families, limited to contacts for families who cannot be directly located for the follow-up survey (N=250 families, 3 contacts each) | 750 | 5 (2-8) | 1 | 62.5 |
| Follow-up Survey | All enrolled families (N=1,200) | 1,200 | 25 (20-30) | 1 | 500 |
| TOTAL Burden Hours | | | | | 702.5 |

We estimate that it will take approximately 25 minutes to administer the telephone follow-up survey to participating families. The estimated length is based on the length of the baseline survey for the Impact of Housing and Services Interventions on Homeless Families (Family Intervention Study), the source of many of the questions contained on the follow-up survey. Smaller families are expected to need only 20 minutes to conduct the survey; whereas larger families are expected to need 30 minutes.

Unfortunately, it was not feasible to pre-test the survey, since so many questions are phrased relative to the rapid re-housing intervention and to the 12-month period following the intervention; however, we plan to pre-test the instrument with the first cohort of families exiting the RRHD in Kalamazoo, Michigan in May 2011. After the pre-test, we will delete questions from the survey if needed to ensure that the survey can be conducted within a 20 to 30 minute period, as we do not believe that it is feasible to administer for a phone survey longer than 30 minutes.

A.13 Capital Costs (Maintenance of Capital Costs)

This data collection effort involves no recordkeeping or reporting costs for respondents other than the time burden to complete the participant contact information as described in item A.12 above. There is no known cost burden to the respondents.

A.14 Costs to the Federal Government

Collection of participant contact information and follow-up survey data has no cost burden to the Federal Government.

A.15 Program or Burden Changes

This request for clearance does not involve a change in burden due to any program changes or adjustments. It concerns a new data collection not previously submitted to OMB for review. This is a new information collection that will increase the public reporting burden.

A.16 Publication and Tabulation Dates

The collection of participant contact data will solely be for the facilitation of tracking the study participants, and therefore will not be published or tabulated at any time. The follow-up survey data will be tabulated and published in a final report to HUD in the Summer of 2013.

The Final Report will include various analyses of the data collected from existing administrative baseline sources and through the follow-up survey. First, data will be analyzed to describe the participants assisted through the Demonstration program. Then subgroups of interest will be identified within the cohort (e.g., those with different family characteristics, those receiving different program models, those with different barriers to housing, or those assessed using different types of tools) and selected analysis comparing these subgroups will be conducted. Finally, this analysis will be extended with multivariate regressions. Outcomes to be modeled will be selected based on the outcomes that appear to vary between subgroups of interest. We will consider using logistic regression for binary outcomes and multinomial logic models from categorical outcomes in addition to ordinary least squares regressions. Exhibit 1 summarizes the primary research questions, analysis plans, and data sources.

Exhibit 1 List of Research Questions, Analysis Plans and Data Sources

| Research | Outcome Measures | Analysis Methods | Data Sources | | | | | | |
|---|--|---|--|--|--|--|--|--|--|
| Area/specific questions | | | | | | | | | |
| Is rapid re-housing an effective intervention for families with moderate barriers? | | | | | | | | | |
| Demographic characteristics and barriers of families who are assessed and served in the program. | Age, Gender, Race/ethnicity, Household size/ composition, Veteran status, Disability status, Income amount and source, Education, and Housing Barriers | Tables with distributions of characteristics of participants – overall and for some subgroups (such as program type and assessment tool) | HMIS: Data on demographics at entry, barriers¹ Data from Programs: Barriers Survey: Employment and education | | | | | | |
| Intervention actually provided to families (length of financial assistance, type and intensity of services) | Length of assistance Type of service Intensity of service | Tables with distributions of variables – for sample overall and for some subgroups (such as demographic group) | HMIS: Length of assistance, possibly services provided ² Survey: Type and intensity of service ³ | | | | | | |
| Location of participating families twelve months after exiting the program. Relationship to specific factors or intervention received. | Location after twelve months (still at RRHD unit, housed elsewhere, in a homeless program) Quality of housing | Tables with distribution of locations overall and for subgroups (such as program type, initial barriers, and demographics) To isolate relationships with these factors, regression model that relates housing status to the program, barrier and demographic characteristics. | Survey: Location and quality of housing Services received HMIS: Demographics and length of participation. Data from Programs: Barriers | | | | | | |
| Share of families that improved self-sufficiency, employment, health and well-being. Timing of change during program enrollment or following program exit. Relationship to specific factors or intervention received. | Changes in employment and timing of change Changes in earnings and timing of change Changes in health indicators Changes in well-being indicators | Tables with distribution of change indicators overall and for subgroups (such as program type, initial barriers, and demographics) To isolate relationship of changes to specific factors and interventions - regression model that relates change indicators (improved earnings, health, well being) with program, barrier and demographic characteristics. | HMIS: Pre entry employment, earnings Survey: Post exit employment, earnings, pre and post health and well- being | | | | | | |

¹ HMIS data on barriers may not be consistently reported across sites. May be able to obtain directly from sites.

² Services provided is optional and may not be complete. May need to rely on participant survey for this.
³ We will verify that survey responses on types of service are consistent with what is known about the programs from the process study.

A.17 Expiration Date

All data collection instruments created for the Evaluation of the Rapid Re-housing for Families Demonstration Program will prominently display the expiration date for OMB approval.

A.18 Certification Statement

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