

Part A. Justification

A1 Circumstances That Make the Collection of Information Necessary

The impacts of the foreclosure crisis on neighborhoods are vast and still unfolding. Research conducted since the emergence of the crisis has demonstrated the significant negative impacts of foreclosures on neighborhood housing prices, municipal budgets, and crime. Underlying the concerns raised by these studies is the premise that foreclosed properties are “contagious” in their effects and produce a series of negative spillover effects throughout the surrounding neighborhoods. As concerns about these spillover effects intensified, Congress authorized \$4 billion as part of the Housing and Economic Recovery Act of 2008 (HERA) to create the Neighborhood Stabilization Program (commonly referred to as NSP1). In 2009, Congress authorized an additional \$2 billion for the Neighborhood Stabilization Program 2 (NSP2) through the American Recovery and Reinvestment Act of 2009 (ARRA). NSP2 was designed to reinforce NSP1 activities and also to refine specific provisions in the program. NSP2 grants were awarded to 56 grantees throughout the country. The 56 grantees cover 3,068 census tracts in 133 counties and 29 states. Of the \$1.93 billion in NSP2 funding, approximately \$947 million went to 24 grantees operating exclusively in states that were hit hardest by the national foreclosure crisis—California, Florida, Michigan, Nevada and Ohio.¹

In February 2011, the U.S. Department of Housing and Urban Development (HUD) commissioned a study to evaluate NSP, with a particular focus on the second round of funding (NSP2). HUD’s evaluation of NSP will likely have lasting implications. The evaluation explores the efficacy of Federal and local policy interventions to arrest neighborhood distress, and thus has the potential to shape the direction of community stabilization efforts for many years to come.

A2 How and by Whom the Data Will Be Used

A2.1 Project Overview

The main objective of this study – the Neighborhood Stabilization Program (NSP) Tracking Panel – is to evaluate the impacts of NSP2 on neighborhoods that were hit hardest by the national foreclosure crisis. Specifically, the study will address four research questions:

1. How was NSP2 implemented by grantees?
2. What outcomes were realized through the NSP2 program?
3. How would neighborhoods likely have progressed in the absence of the NSP2 program?
4. What factors are associated with program success in terms of both neighborhood stability and program production outputs?

To answer these questions, researchers will use qualitative and quantitative research approaches to execute five key components:

¹ See: www.hud.gov/offices/cpd/communitydevelopment/programs/neighborhoodspg/pdf/nsp2awardtotalAllocation.pdf

1. *A descriptive overview of all 56 NSP2 grantees.* Using information collected from NSP2 grant applications and through HUD's Disaster Recovery Grant Reporting (DRGR) system, the project will describe the attributes and outputs of all 56 NSP2 grantees to provide a profile of the program.
2. *An implementation assessment of the NSP2 grantees in the study sample.* Two rounds of site visits will be conducted during the course of the project, providing ample opportunities to interview grantee staff and other key stakeholders about their implementation strategies and NSP2 activities. Separate OMB clearance packages will be submitted for each round of site visits. This OMB clearance package covers the first round of site visits, and a subsequent clearance package is expected in the summer 2012 for the second round of site visits.
3. *A descriptive outcomes analysis of NSP2 neighborhoods and comparison neighborhoods in the study sample.* The descriptive outcome analysis will use administrative data to document how NSP2 neighborhoods changed during the period of the housing boom and bust, and the subsequent intervention by NSP2. The descriptive outcome analysis will also compare the trajectories of NSP2 neighborhoods with other tracts in the counties, including the carefully selected comparison tracts.
4. *An impact analysis of NSP2 activities within the study sample.* The goal of the impact analysis is to understand the effect that NSP2 had on neighborhoods. The impact analysis will empirically measure the effects of NSP2 activities on property- and tract-level outcomes using administrative data from several sources.
5. *A cross-site analysis of the results.* The cross-site analysis will synthesize the results from the various project components across different housing market and grantee types. The object of this analysis is to discover broader conclusions of how NSP2 worked in a variety of housing market settings, methods of intervention, and grantee types.

As suggested by these five project components, the evaluation of the NSP2 program is data intensive. The evaluation relies on program data maintained by HUD, administrative data from the U.S. Census Bureau, property-level data purchased from private vendors and supplemented by grantees, crime data from local police departments and other local data, and quantitative and qualitative data from on-site interviews with grantees and other stakeholders. HUD's contractors for the study—Abt Associates, the University of Southern California and the Concentrance Consulting Group—have already secured access to the program data maintained by HUD and property-level data from private vendors. Data from the U.S. Census Bureau are public. Other data collection activities require OMB approval.

This is a request to conduct phase one of the data collection process that includes three components:

- 1) **Reconnaissance telephone calls** with NSP2 grantees to determine which grantees are appropriate for inclusion into the study.
- 2) **Baseline on-site interviews** (round one) with a sample of NSP2 grantees and their partner organizations, and
- 3) **Reviewing the availability of local administrative data** (i.e., crime records, regional public transportation shapefiles, and state education assessment data) from local municipalities.

A separate OMB clearance package will be prepared for the second round of site visits and any further data collection that requires OMB approval and may be necessary pending the results of the first round.

A2.2 Purpose of the Data Collection

Phase one of the data collection activities focuses on the reconnaissance telephone interviews with a preliminary sample of NSP2 grantees, on-site interviews with representatives from grantees and partner organizations, and telephone calls with representatives from local municipalities to assess the availability of local crime records, regional public transportation shapefiles, and state education assessment data.

Reconnaissance Telephone Calls

Using HUD and publicly available administrative data, researchers have already narrowed the universe of NSP2 grantees to about 25 candidates (operating programs in 21 counties) for inclusion in the study, down from 56 in total. (Section B2 describes the sampling approach.) The purpose of the reconnaissance telephone calls is two-fold. First, researchers will confirm the grantee's actual and planned NSP2 activities, focusing on the type of activity and the number of properties associated with each activity. Second, researchers will explore whether the grantees compile property-level data that may be used to supplement the data purchased from private vendors. For each eligible NSP2 activity pursued by grantees, representatives from the grantees will be asked about the availability of specific data variables, the quality of the data, the storage format, and whether the data are stored centrally or across several organizations. This information will allow researchers to gauge the availability of supplemental data and finalize the study sample.

On-site Interviews

Once the study sample is final, researchers will conduct the first round of on-site interviews with representatives from the NSP2 grantees and their partner organizations. The qualitative interviews will serve as the study's main source of information about the NSP2 program implementation process. As discussed in more detail below, the primary goals of the baseline interviews are to:

- Gather detailed information on grantees' overall strategy, program design, partnership arrangements, baseline expectations, and implementation.
- Understand how targeted tracts were selected, which in turn will help researchers to identify appropriate comparison census tracts.
- Contribute to our understanding of the factors that could potentially affect the success of NSP2 programs. These factors include pre-existing organizational capacity and coordination with other neighborhood revitalization activities and the use of other funding to support NSP2 activities.
- Provide insight into the findings from the impact and cross-site analysis.

Prior to visiting grantees in the sample, researchers will review of the grantees' applications, action plans, and quarterly progress reports, allowing them to avoid duplicate data collection and to go into greater depth on these topics:

Overall strategy. NSP2 grantees prioritized their interventions differently and attempted to tailor the NSP2 assistance to align with the challenges facing their targeted areas. The site visits will discuss grantees' overall strategy for NSP2 and how the strategy evolved over time. In particular, researchers will explore the rationale behind each strategy and to determine whether there are common constraints or enabling factors that lend themselves to particular strategies. This information will help contextualize the results from the quantitative analyses and potentially suggest the factors that may contribute to the relative success of NSP2 program.

Baseline expectations. The site visits will gather grantee and partner expectations regarding program outcomes and neighborhood impacts. These expectations will be compared with actual outcomes

achieved over the course of the grant period. The primary goal of these interview questions is to provide a comparison of planned and achieved production outputs to help HUD understand the factors that are associated with grantees' ability to meet their production goals.

Partnerships. A variety of partnership arrangements were formed to apply for and implement NSP2 grants. Grantees could conduct NSP2 activities themselves, share the work with partners, or sub-grant or subcontract the work to other organizations. The interview will discuss the specific roles of consortium members or partner organizations and the ways these arrangements affected grantees' outcomes. The goal of this discussion will be to understand grantees' approach to selecting partners and partners' roles in implementing the program and help identify whether partnership structures influence the program's success across grantees.

Selection of targeted tracts and the degree of geographic concentration of NSP2 activity. The site visits will explore grantees' rationale for picking targeted census tracts for NSP2 assistance and the extent to which the grantee's activities are concentrated within the targeted areas. The degree of geographic concentration of NSP2 activity may influence the level of grantees' success in achieving NSP2 program outcomes and production outputs. This information will help researchers to identify comparison neighborhoods for the impact analysis (i.e., tracts with similar characteristics but not chosen for NSP2). It will also provide a better understanding of whether the degree of geographic concentration of NSP2 activity is a factor that may contribute to the relative success of NSP2 programs.

Pre-existing organizational capacity. NSP grantees have different levels of organizational capacity, resources, and experience with neighborhood stabilization activities. For some grantees, this includes specific experience with NSP1. The baseline visit will collect several measures of organizations' experiences and capacities to undertake NSP2. If relevant, the baseline interviews will capture organizations' lessons learned from NSP1 and how this has informed plans for NSP2, as well as changes to staff or training in response to experience with NSP1. In addition to clarifying and expanding on our understanding of grantees' organizational capacity (from the original application), this information will also help to identify whether organizational capacity is a factor that affects program success across grantees.

Use of other funding sources to support NSP2 activities. One of the factors for awarding NSP2 funds was the degree to which grantees planned to leverage non-NSP2 funding. The baseline site visits will identify the sources and amounts of non-NSP2 funding that the grantees have leveraged or plan to leverage, including other sources of federal funding (which were not counted as a factor in NSP2 grant award decisions). In addition to providing a measure of whether leveraging sources and strategies changed from grantees' original plans, this will identify whether accessing additional resources helped play a significant role in helping NSP2 achieve its goals. It will also help to clarify the role of NSP2 funds in observed neighborhood impacts.

Coordination with concurrent activities undertaken by grantees or other organizations to spur neighborhood revitalization. NSP2 activities do not occur in a vacuum and may be layered with other ongoing community development efforts. The site visit interviews will identify other spending on neighborhood revitalization and foreclosure-related activities within targeted tracts and comparison tracts, as well as capture how NSP2 activities relate to these other efforts. This understanding will be useful in identifying comparison neighborhoods for the impact analysis, which ideally will be non-targeted tracts

that have similar levels of non-NSP interventions to targeted tracts. The goal is to establish a general understanding of other efforts will help to inform the findings from the impact and cross-site analyses.

Reviewing the Availability of Local Administrative Data

There are three types of local data that may or may not be available for use in the study: crime records, regional public transportation shapefiles, and state education assessment data. Crime rates are one of the study's key measures of neighborhood stability in the study. The crime data will be used to estimate the cumulative impact of foreclosures on crime and the cumulative impact of NSP2 activities on the incidence of crime near NSP2 properties. However, because there are no national data sources that keep point-level offense records, researchers will work with local law enforcement agencies directly to obtain crime data.

The availability of two other types of local data will also be explored. Access to public transit is an important locational attribute that captures the proximity of the census tract to public services and other neighborhood amenities. Shapefiles that plot the location of bus subway service routes and stops will be collected from local agencies in counties where a Shapefile is publicly available. The information in the Shapefile can be manipulated to construct tract-level measures that reflect proximity to public transportation. Also, the quality of schools is another measure of public services that is relevant to the analysis and the selection of comparison tracts. Census tract-level measures of educational quality may also provide a valuable covariate in the hedonic regressions that will be used estimate the impact of foreclosures on key outcome variables. Researchers will explore the availability of these data with local representatives.

A2.3 Who Will Use the Information

The information collected during phase one of the NSP evaluation will be used by HUD's research team: Abt Associates, the University of Southern California and the Concentrance Consulting Group. The information will be compiled and analyzed to execute the six project components described in section A2.1.

A2.4 Instrument Item-by-Item Justification

Several instruments have been developed to guide the reconnaissance telephone calls and the on-site baseline interviews. The telephone discussions with local representatives, including police departments, to potentially acquire crime records, public transit Shapefiles, and school data will not follow a structured interview guide, but rather occur through general conversations about the availability and cost of accessing these data.

Two instruments will guide the reconnaissance activities with NSP2 grantees (summarized in Exhibit 1). The first instrument is a short questionnaire intended for the Executive Director of each grantee. It confirms grantees' current and planned NSP2 activities. Understanding each grantee's actual and planned activities is critical because these activities represent the specific types of interventions that are being evaluated in the study and it is important to include a balanced representation of NSP2 activities in the study sample. The second instrument is a data worksheet that reviews the availability and accessibility of specific property-level variables for the study. These data will be used to supplement the data purchased from private vendors and many will be used as covariates in the regression analyses. A copy of the reconnaissance questionnaire and data worksheet is provided in Appendix A.

Exhibit 1: Justification of Reconnaissance Telephone Call and Data Worksheet

Worksheet Section	Sub-Sections	Respondents, Content, and Reason for Inclusion
Grantee Information	N/A	<p>Respondents: Executive Directors at 27 NSP2 Grantees</p> <p>Content:</p> <ul style="list-style-type: none"> • Types of current and planned NSP2 activities, and number of properties per activity. • Level of confidence that planned activities will materialize. • Contact information for grantee’s data person. <p>Reason: Confirm NSP2 actual and planned activities, and obtain contact information for grantee’s data person.</p>
Availability and Quality of Property-Level Data	Financing Activities	Respondents: Data person at each of the 27 NSP2 grantees
	Acquisition and Rehabilitation	Content: Collection status of specific variables, quality across all property records, storage format, and level of data centralization, by activity type.
	Land Banking	Reason: Determine the availability and quality of the grantee’s property-level data needed to document NSP2 activity outcomes and supplement the data purchased from private vendors.
	Redevelopment	
	Demolition	

In addition, three interview instruments have been developed for the baseline site visits (summarized in Exhibit 2). The instruments are targeted to three types of program staff: (1) program design staff at the primary NSP2 grantee, (2) program operations staff at the NSP2 primary grantee; and (3) staff at partner organizations. The instruments review the organization’s background, overall NSP2 strategy, implementation obstacles and challenges, partnership arrangements, approach to target areas and properties, current neighborhood revitalization, funding, organizational capacity, prior NSP1 experiences, and expected outcomes. A copy of the complete baseline interview protocols are provided in Appendix B.

Exhibit 2: Justification of Baseline On-Site Interview Topic Guides

Sub-Section	Respondents	Content and Reason for Inclusion
Introduction	<ul style="list-style-type: none"> • Primary grantee program design staff • Primary grantee program operations staff • Partner organization staff 	<p>Content:</p> <ul style="list-style-type: none"> • Personal introductions • Brief description of the evaluation. • Purpose of the visit. <p>Reason: To ensure the respondents understand the purpose of the interview and their rights as interviewees.</p>
Organization	<ul style="list-style-type: none"> • Primary grantee 	Content:

Sub-Section	Respondents	Content and Reason for Inclusion
Background Information	<ul style="list-style-type: none"> program design staff Partner organization staff 	<ul style="list-style-type: none"> Organization’s mission, staff size, annual budget, service geography, and programs run in addition to NSP2. Organization’s first involvement with NSP. <p>Reason: To provide information on the organization’s regular programing, determine previous experience with NSP2 related activities, and distinguish if involved with NSP1.</p>
Overall NSP2 Strategy	<ul style="list-style-type: none"> Primary grantee program design staff Primary grantee program operations staff Partner organization staff 	<p>Content:</p> <ul style="list-style-type: none"> NSP2 eligible activities the organization is pursuing. Reasons for any changes from the application/action plans. The decision process and influential factors behind the strategy to pursue these activities. <p>Reason: To determine organization’s baseline overall strategy and to understand why grantee pursued the NSP-eligible activities they did.</p>
Obstacles and Challenges	<ul style="list-style-type: none"> Primary grantee program design staff Primary grantee program operations staff Partner organization staff 	<p>Content:</p> <ul style="list-style-type: none"> Implementation challenges and responses to them. Strategies that have worked well. NSP2 program rules expected to support or hinder implementation. <p>Reason: To determine organization’s baseline implementation experience so far and future implementation expectations.</p>
Partnerships	<ul style="list-style-type: none"> Primary grantee program design staff Partner organization staff 	<p>Content:</p> <ul style="list-style-type: none"> Partner organizations and their specific role and responsibility within the program. How grantees coordinate NSP2 efforts among partner organizations. <p>Reason: To identify partnership types and structures and to understand grantee’s approach to selecting partners and partners’ roles in implementing the program.</p>
Target Area and Properties	<ul style="list-style-type: none"> Primary grantee program design staff 	<p>Content:</p> <ul style="list-style-type: none"> Area targeted for the NSP2 program. The decision process and influential factors behind the strategy to target these areas. Degree of geographic concentration of activities. Characteristics of targeted neighborhoods and non-targeted neighborhoods. <p>Reason: To explore grantee’s rationale for picking targeted census tracts for NSP2 assistance and the degree of concentrating their NSP2 activity, as opposed to a dispersed approach. Also to help identify comparison neighborhoods.</p>
Concurrent Neighborhood Revitalization Activities	<ul style="list-style-type: none"> Primary grantee program design staff 	<p>Content:</p> <ul style="list-style-type: none"> Previous and current NSP2 or non-NSP2 funded neighborhood stabilization activities in the area. Organization’s efforts relation to and coordination with these other activities.

Sub-Section	Respondents	Content and Reason for Inclusion
		<p>Reason: To identify other spending on neighborhood revitalization and foreclosure-related activities within targeted tracts and comparison tracts as well as capture how NSP2 activities relate to these other efforts.</p>
Funding	<ul style="list-style-type: none"> • Primary grantee program design staff 	<p>Content:</p> <ul style="list-style-type: none"> • Budget allocation per NSP2 eligible activity. • Leveraging sources and funding levels. <p>Reason: To confirm the sources and amounts of non-NSP2 funding that the grantee has leveraged or plan to leverage, including other sources of federal funding.</p>
Staff and Organizational Capacity	<ul style="list-style-type: none"> • Primary grantee program design staff • Partner organization staff 	<p>Content:</p> <ul style="list-style-type: none"> • Staff working on NSP2. • Specific training held for staff. • Technical assistance received. • Use of technological tools. <p>Reason: To expand on application-based information on organization’s pre-existing capacities to undertake NSP2.</p>
NSP1 Experience	<ul style="list-style-type: none"> • Primary grantee program design staff • Partner organization staff 	<p>Content:</p> <ul style="list-style-type: none"> • Organization’s role in NSP1. • Lessons learned and implementation experience from NSP1. • Organizational or program related changes made for NSP2 in response to NSP1. <p>Reason: To capture organization’s lessons learned from NSP1 and how this has informed plans for NSP2, as well as changes to staff or training in response to experience with NSP1.</p>
NSP2 Outcomes	<ul style="list-style-type: none"> • Primary grantee program design staff 	<p>Content:</p> <ul style="list-style-type: none"> • Outcome expectations for NSP2 activities pursuing. • Outcome expectation outside of the NSP2 activities. • Program neighborhood impact expectations. <p>Reason: To gather grantee and partner expectations regarding principal program outcomes and neighborhood impacts.</p>
Wrap-Up/ Conclusion	<ul style="list-style-type: none"> • Primary grantee program design staff • Primary grantee program operations staff • Partner organization staff 	<p>Content:</p> <ul style="list-style-type: none"> • Interviewee questions or comments. <p>Reason: Allows the interviewees to ask questions or provide comments that were not previously discussed.</p>

Appendix C provides an item-by-item justification for each question in the interview protocols.

A3 Use of Improved Technologies

Reconnaissance Telephone Calls

The reconnaissance telephone calls utilize a data worksheet (Excel spreadsheet) with built-in, user-friendly, pull down menus where applicable. The pull-down menus simplify the completion of the worksheet and standardize the response categories. The worksheet will be emailed to grantees prior to the telephone discussion, and grantees will have the option of either completing the worksheet during the telephone call (with the interviewers assistance) or prior to telephone call.

On-Site Interviews

An automated electronic interview format is inappropriate for the on-site grantee and partner interviews. Instead, these interviews will be administered using baseline interview guides that allow interviewers the flexibility to accommodate the diverse range of NSP2 grantees interviewed and qualitative information collected. However, this data collection method will not result in increased burden for respondents. Research staff will be fully responsible for documenting participants' qualitative responses and will later input them in the qualitative research software NVivo.

Reviewing the Availability of Local Administrative Data

All local administrative data from municipalities will be requested in electronic format.

A4 Efforts to Avoid Duplication

As part of the design process for the study, HUD and contractor researchers discussed possible areas where duplicative data collection activities were occurring through other research and program implementation efforts. HUD is not aware of any other similar data collection being undertaken for applicants and recipients of NSP2 funds.

In addition to avoiding the duplication of external data collection efforts, HUD's researchers are committed to reducing any duplication of data grantees are already reporting to HUD. The study's data collection activities supplement and extend beyond what grantees currently report to HUD. NSP grantees are required to submit an action plan and quarterly performance reports (QPRs) to HUD. For both the **reconnaissance telephone calls** and the **on-site interviews**, researchers will gather all the information available from pre-existing sources including grantees' action plans, QPRs, and applications, so that these data collection activities will only be asking participants for information that they exclusively can provide.

Also, prior to contacting local officials about their **administrative data**, researchers will review relevant publications and consult with other researchers who have worked with these data (e.g., compiled the data from localities) regarding the availability and quality of the data. These conversations may suggest that specific types of administrative data are (or are not) available for the study sites. If the researchers learn that specific data are not available for any particular study site, they will not contact the site about the availability of the data.

A5 Involvement of Small Entities

The three data collection activities (**reconnaissance telephone calls, on-site interviews, reviewing the availability of local administrative data**) may include small entities. To reduce the burden on these smaller entities, as well as larger organizations participating in the study, the information being requested has been held to the minimum required for the intended use of the data.

A6 Consequences of Less Frequent Data Collection

Reconnaissance Telephone Calls

The reconnaissance telephone calls will only be administered once in the spring of 2012. The risk of not conducting the reconnaissance telephone calls at all is that it will greatly increase the likelihood that the study will select grantees for inclusion into the study, expend resources to collecting data from these grantees, and then run the risk that some will eventually be dropped from the sample due to insufficient data.

On-Site Interviews

The on-site grantee and partner organization interviews will be administered once only in the spring of 2012. (Follow-up interviews are planned for the spring of 2013, and a separate OMB clearance package will be submitted for these interviews.) The risk of not administering these interviews at all is that the study will not have an understanding of grantees' implementation progress and program outcome expectations needed to conduct the implementation analysis.

Reviewing the Availability of Local Administrative Data

The requests for local administrative data will only be administered once in spring 2012. The risk of not compiling the local administrative data at all is that the study will not have a baseline measure of neighborhood stability needed to conduct the impact analysis or identify comparison tracts.

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.

A8 Consultations Outside the Agency

In accordance with the Paperwork Reduction Act of 1995, HUD published a notice in the Federal Register on July 5, 2011 (see Appendix D), announcing the agency's intention to request an OMB review of data collection activities for site visits for the Neighborhood Stabilization Program Tracking Study. The notice provided a 60-day period for public comments; none were received.

HUD's researchers developed the study design and instruments in consultation with staff from HUD and an expert panel of researchers. The panel was composed of academics, policy experts, and methodologists who have relevant substantive and technical experience with the NSP2 evaluation. In

addition, HUD staff also reviewed the data collection instruments to ensure that each is clear, flows well, and is as concise as possible.

A9 Payments to Respondents

This study will not use incentive payments.

A10 Arrangements and Assurances Regarding Confidentiality

HUD's contractors take seriously the responsibility to protect the subjects they interview. The data collection plan and instruments were exempt from an Institutional Review Board because the information being collected for the study is program-level data, rather than individual-level information.

Grantee and partner organizations may be identified in the study reports but the responding participants within each entity will not be identified, protecting their privacy.

A11 Sensitive Questions

The site visit interview protocols do not contain questions of a sensitive nature, but rather focus on program-level topics about how the NSP program was implemented.

A12 Estimate of Annualized Burden Hours

The estimate of burden hours is calculated separately for each data collection activity (see Exhibit 3). For the reconnaissance telephone calls, researchers expect to contact approximately 40 grantees to eventually select about 25 for inclusion into the study. Researchers expect that some grantees will not have sufficient data to participate in the study or may choose to withdraw from consideration, thus researchers are conducting outreach calls to 15 additional grantees to account for this possibility. The complete reconnaissance telephone call with the executive director and data person is expected to last about 1 hour.

Once grantees are selected for inclusion into the study, researchers expect to conduct about 25 site visits. The on-site interviews will take approximately 2 hours per person and will be administered to approximately 4 staff per NSP2 grantee and 4 additional staff among partner agencies.

To review the availability of local administrative data, researchers expect to contact one person via telephone within each county where a grantee is located. In total, the telephone call will require approximately 2 hours from one person per grantee.

Exhibit 3: Response Burden Summary

	Number of entities	Responses per entity	Hours per response	Total hours
Reconnaissance telephone calls	40	1	1	40
Interviews with NSP2 grantees	25	4	2	200
Interviews with partner agencies	50	4	2	400
Reviewing records with local representatives	25	1	2	50

A13 Estimated Record Keeping and Reporting Cost Burden on Respondents

There is no cost to respondents other than the time required to respond to the reconnaissance telephone calls, participate in the on-site interviews, and assist researchers with reviewing the availability of local administrative data.

A14 Estimated Cost to the Federal Government

The direct and indirect costs for a contractor to collect, analyze, and provide this information for the Office of Policy Development and Research at HUD is \$491,259.

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 Tabulation Plan and Statistical Analysis

The information collected from the baseline site visits will be used in conjunction with several other data sources, including follow-up site visits, to evaluate the impact of the NSP2 program on neighborhood stability. The specific use of these data sources within each evaluation component is described below.

Implementation Analysis

The implementation analysis will use data from the baseline on-site interviews (and the follow-up on-site interviews) to create tabulations that compare components of grantees' implementation expectations to grantees' actual implementation experiences. Data from the baseline on-site interviews that will be used in these analyses include grantees' expectations of: 1) the NSP2 eligible activities they will continue to pursue; 2) the outcomes they will achieve; 3) the non-NPS2 funds they will successfully leverage (both federal and non-federal); 4) and the characteristics of individuals that will directly benefit from the program. In addition to these tabulations, this data will also be used in a qualitative analysis to identify and summarize common themes among each of these components of grantees' implementation expectations.

The implementation analysis will also use cross-tabulations to examine how several factors affect the likelihood that grantees achieved their intended outcomes. Data from the baseline on-site interviews that will be analyzed include several factors: 1) pre-existing staff capacity; 2) training; 3) technical assistance;

4) use of innovative technology tools; 5) partnership types; 6) level of concentrated NSP2 activities; and 7) the presence or degree of other intervention in grantees' targeted neighborhoods.

Descriptive Outcome Analysis

The baseline crime data will be used to measure the presence of violent, property, and public order crimes, as well as a composite score of total crime. These measures will be used within the three components of the outcome analysis. The first component of the analysis will document the level and change of neighborhood crime to provide context for understanding the magnitude of any impacts found in the impact analysis. The second component will compare the level and change of neighborhood crime in NSP2 targeted tracts and other neighborhoods by plotting the crime outcomes of NSP2 neighborhoods against the distribution of crime outcomes throughout the county. The last component of the analysis will compare the level of neighborhood crime across counties by grouping counties into categories that reflect the sampling strata and the NSP2 activities conducted in the county and analyzing the extent to which neighborhood outcomes differ by county type.

Impact Analysis

One component of the impact analysis will use the crime data to estimate the cumulative impact of foreclosures on crime and the cumulative impact of NSP2 activities on the incidence of crime near NSP2 properties. This analysis will use multivariate regression to identify the impact of changes in the foreclosure status of a property across time on the amount of crime in the proximate area relative to the counterfactual area. The analysis approach seeks to determine whether NSP2 activities mitigate the impact of foreclosures on crime.

In addition, the information obtained during the site visits regarding each grantee's organizational capacity, partnership arrangements, and other factors that may influence the program's success will be used in the multivariate regression to measure their statistical significance.

Cross-Site Analysis

The cross-site analysis will utilize a combination of descriptive statistics and qualitative discussion, working from and incorporating results from the implementation and impact analyses. The object of this analysis is to discover broader conclusions of how NSP2 worked in a variety of housing market settings, methods of intervention, and grantee types. The data from the baseline on-site interview and crime data will be used to categorize NSP2 programs within groupings of grantee-characteristics and neighborhood crime levels.

Study Schedule

The reconnaissance phone calls will be administered in Spring 2012, following OMB review of this submission. Data collection activities will begin immediately thereafter and continue through June 7, 2013 (week 120). This includes the baseline site visits which will be conducted in early 2012 and the follow-up site visits which will be conducted in January and February 2013. (Again, a separate OMB clearance package will be submitted of the follow-up site visits.) Final data analysis will begin 120 weeks after contract award and 20 weeks before the first draft of the final report is due.

There are two project briefings scheduled during the course of the study: Spring, 2012 and November 2013. The goal of the first briefing is to provide an overview of the project's status and highlight the lessons learned from NSP2 data collection and analysis that may have implications for NSP2 program

implementation. A second briefing will be scheduled two weeks after a draft final report is submitted to HUD, which will review preliminary findings and gather feedback from HUD on the draft final report.

A18 Exceptions to Certification

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