



Homelessness Prevention Study
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OMB Paperwork Reduction Act Submission for Homelessness Prevention Study Site Visits

Part A: Justification

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PART A: JUSTIFICATION

This supporting statement provides detailed information on proposed data collection activities associated with the Homelessness Prevention Study administered by the U.S. Department of Housing and Urban Development (HUD). This data collection was approved under emergency review (OMB Control # 2528-0270) which expires on January 31, 2012. Most of the data collection is already completed; however, 8 site visits remain to be completed, therefore we are now requesting OMB clearance to complete the remaining 8 site visits.

A1. Circumstances that make the collection of information necessary

Congress established the Homelessness Prevention and Rapid Re-Housing Program (HPRP) under the American Recovery and Reinvestment Act of 2009 (ARRA), to provide resources to state and local governments to aid households at risk of homelessness maintain stable housing and to help those currently experiencing homelessness get back into permanent housing quickly. Through this program, HUD allocated \$1.5 billion (based on the formula it uses to determine emergency shelter grants) to 535 government agency grantees (55 states and territories, 147 counties, and 333 cities) to be spent over a three-year period.¹ The funding for this program was critical during a deep recession and mortgage crisis that continues to affect households across the country, resulting in unprecedented loss of employment and housing. HPRP funds are the first major federal effort to fund homelessness prevention activities and, as such, represent a tremendous opportunity to learn about the types of programs communities are designing and implementing across the country.

There is considerable flexibility and, consequently, variability in the ways HPRP grantees have implemented their programs. Grantees may choose to take on direct service delivery themselves or disburse funds to local nonprofits and/or government agency subgrantees. Grantees may have numerous subgrantees and subgrantees can operate HPRP-funded prevention programs for more than one grantee. It is also the case that direct grantees can simultaneously act as subgrantees to other grantees. These complex HPRP networks vary significantly from one community to the next. Preliminary analysis of HUD grantee and subgrantee data shows a total universe of approximately 2,700 grantees and subgrantees.

Grantees and subgrantees have dedicated resources to support a wide variety of different prevention and rapid re-housing services. For example, HPRP funds may support already homeless households and those at risk of homelessness with housing relocation and stabilization services, including outreach and engagement, case management, housing search and placement, legal services, and credit repair counseling. HPRP programs also routinely provide direct financial assistance for back rent payments, rental assistance or costs associated with moving like security deposits, utility payments, moving costs, and motel and hotel vouchers. Notably, grantees have substantial discretion in structuring financial assistance, including the duration (3 to 18 months), depth, and tenant share of the rental subsidy. However, there are types of assistance for which grantees may not use HPRP funds. Among these, are program elements that may have been present in a grantee's pre-existing prevention or rapid re-housing program, including employment counseling, training or educational programs, child care, or help with transportation, food, household items, furniture, appliances, or help with mortgage payment arrears.

HUD requires that all agencies use the same criteria to determine basic eligibility for HPRP services, although communities may choose to establish additional targeting criteria. All program recipients must have income at or below 50 percent of the area median income and they must be either homeless or at imminent risk of homelessness.

¹ This does not include the four grantees from American Samoa, Guam, the Northern Marianas, and the Virgin Islands.

Recipients of homelessness prevention services must show that they would likely be homeless “but for” this assistance and that they will be “able to achieve stable housing” once HPRP support ends. Primary HPRP grantees may add other eligibility criteria to target their services to particular populations.

More than halfway through HPRP implementation, HUD has requested an in-depth *process study* of HPRP-funded *prevention programs*.² This study will provide detailed information as to how communities have implemented the program in order to document the usage of HPRP funds and inform the design of a future study of the *impact* of homelessness prevention programs. The following approaches to data collection will be taken as part of this study:

(a) An analysis of existing **HUD Performance Reports** to create a database documenting basic information, program activities and related expenditures for the universe of grantees in order to construct a general overview of those entities directly receiving HPRP funds. We will also use HUD Performance Reports to identify the universe of subgrantees in order to construct a two-stage sample design (grantee- subgrantee) for the web survey (see section (c) below). The information contained in these reports includes the following:

1. Quarterly Performance Report (QPR) – Grantees aggregate the data for the QPR from HMIS client-level data and submit it to HUD via *e-snaps four times a year*. In addition to including contact information for the HPRP grantee, it includes program information on number of clients served, types of prevention services (reported in HUD-created categories), and HPRP expenditures by category.³
2. Initial Performance Report (IPR) – Grantees submitted the IPR in October 2009. In addition to information regularly collected by the QPR, the IPR recorded information on grantee targeting and HMIS plans. The IPR also required that grantees attach a sheet reporting limited contact data on subgrantees.⁴
3. Annual Performance Report (APR) – The APR provides grantee information, program outputs, client characteristics by household type and by exit status (still a client or exited), HPRP expenditures by service type, eligible activities and sub-activities, and program performance by service type.⁵
4. Integrated Disbursement and Information System (IDIS) – Grantees use this online database to draw down HPRP funds. The IDIS unit of analysis is the service delivery agency and must “represent either the subgrantee or the organization directly carrying out HPRP-funded activities.”⁶ The IDIS collects data on expenditures by HPRP activity (i.e., prevention financial assistance, prevention housing relocation and stabilization services) and minimal information on the organization or grantee/subgrantee.

² This study does not include an examination of HPRP-funded rapid re-housing programs.

³ This information is available by prevention and rapid re-housing activities, but does not specify families or individuals.

⁴ Contact information is provided for subgrantee awards of \$25,000 or more.

⁵ HUD has not yet published the final APR for HPRP, but we assume that information collected will be similar to those required of other HUD homelessness programs. Publications have been delayed to modify the original APR so information pertaining to family versus single adult households can be distinguished. This change will greatly assist the present study, as this distinction is quite important.

⁶ For more on project structure see *Using IDIS for the Homelessness Assistance and Rapid Re-Housing Program Updated: April 12, 2010 for IDIS Version 11.1.0*. The reliability of these data is unknown and will be explored further during the research design phase of this study.

(b) A **web survey** to solicit responses from grantees and subgrantees regarding the HPRP program design, implementation, program operations (e.g. screening and assessment, and services provided), and program monitoring and data collection activities.

(c) **Site visits** to meet with key informants, such as systems- and provider-level stakeholders, to understand community decision-making, HPRP operations and activities, assessment and triage work, the relationship of HPRP to local homeless assistance networks, and lessons learned.

(d) Convening an **expert panel** with researchers, technical assistance providers, practitioners, grantees and policy advocates to discuss the proposed research design options for a future experimental, or quasi-experimental, study; and to discuss the challenges associated with evaluating the impact of prevention programs.

This OMB submission addresses research activities described in (c) the site visits.

A2. How, by whom, and for what purpose the information is to be used

A2.1 Project Overview

HUD contracted with the Urban Institute (along with subcontractors, Abt. Associates, The Cloudburst Group, and Vanderbilt University) to conduct the Homelessness Prevention Study. This 76-week long project will examine how communities are allocating HPRP funds and implementing programs. It involves multiple research methods to produce valid data for describing and assessing program activities and outcomes. The study itself is broken down into two principal components. The first is a *multi-methods process study* that encompasses analysis of HUD performance reports, a web survey of a nationally representative sample of HPRP grantees and subgrantees, and site visits to 15-18 of HPRP-funded communities that include discussions with key informants. The second component consists of a *feasibility study* that draws on the process study and a panel of experts to present design options for experimental or quasi-experimental impact studies of homelessness prevention programs.

Upon completion, the study will make substantial contributions to the understanding of homelessness prevention efforts and related policies. Specifically, it will:

- Describe in detail how HPRP grantees across the country have used Recovery Act funding and accurately capture the types of efforts being implemented at both the *systems* and *program* level;
- Document how communities conceptualized and established their prevention program; how they implemented their program; and how they measure outcomes related to the program; and
- Identify three approaches for rigorously evaluating the impact of homelessness prevention programs in one or more future studies.

A2.2 Purpose of the Data Collection

To address all of the key policy topics noted above and to satisfy Office of Management and Budget's (OMB) requirements that federal agencies undertake independent evaluations of program performance,⁷ new data (for which

⁷ To date, no such study has taken place for HPRP.

this OMB clearance is requested) must be gathered. The data currently collected by HUD for program administration purposes provides little insight into specific program activities or HPRP implementation on the ground.

Using a sophisticated methodology to sample 100 grantees and 400 subgrantees, the proposed survey of HPRP grantees and subgrantees will produce a clear national picture of the structure of HPRP programs and the kinds of activities that are being carried out with ARRA funds. To reduce reporting burden and increase response rates, the survey will be administered online and consist of closed-ended questions.

The site visits to 15 to 18 communities across the country will provide vital information about the implementation of specific homelessness *prevention* programs, which will include understanding how programmatic decisions are made and evolve, how grantees and subgrantees coordinate their efforts within homelessness service *systems*, how different program’s designs work in the field, and how different communities are approaching the evaluation of client outcomes. We plan to identify qualified sites through discussions with experts in the field and from preliminary survey results. From this pool, we will purposefully sample sites based geographic diversity and program size as well as five criteria: strong implementation; presence of triage and targeting efforts; different program target populations; a range of prevention activities and mix of emergency and systems prevention efforts; and HMIS coverage.

A2.3 Who Will Use the Information

Data from the web survey will allow HUD to characterize current homelessness prevention activities, clearly identify programmatic differences among grantees and subgrantees, and pinpoint areas where HUD guidance may be needed. These data will also help HUD make decisions about the future design of homelessness prevention programs.

Information gleaned from the site visits will enable HUD to identify in more detail the strengths, weaknesses, gaps, and major challenges of implementing homelessness prevention programs both on a systems and program level in order to make the necessary adjustments (e.g. provide more technical assistance, resources) to make the program most effective. The site visits will also lay the groundwork for future analyses of the *impact* of homelessness prevention programs by providing insight into issues around the selection of clients and local agency evaluation capacity.

A2.4 Instrument Item-by-Item Justification

Site Visit Interview Guide

Exhibit 2 lays out the principal domains covered by the site visit interview guide and a clear justification for each area’s inclusion in our instrument. The proposed site visit interview guide is included in Appendix A.

EXHIBIT 2. Item-by-Item Justification of Site Visit Interview Guide	
Question(s) / Topic(s)	Content and justification for inclusion
Agency and Respondent Role in HPRP Prevention	This first question helps the interviewer understand/clarify a couple of key things about the respondent and his/her agency that set the stage for the rest of the interview: 1) whether or not the agency is an HPRP grantee and/or subgrantee, and 2) whether or not they directly provide HPRP prevention services. There are many complex relationships in the HPRP

<p><i>Sections 1 and 2</i></p>	<p>prevention system. It is possible that an agency may be both a grantee and a subgrantee to multiple grantees. There are also sub-sub grantees in the system that are not captured by HUD data systems at all. This detailed information is needed to map out what the agency's place is in the HPRP funding structure. It is also important to know if the agency is a direct HPRP prevention service provider because it identifies to the interviewer the need to ask "program level" questions during the interview. The other information solicited in this section of questions provides further information about the local role of the agency and its larger context. We have no information about the agency's service areas or how they define their local community or network of homelessness response. This information is critical to understanding how a "system" of homelessness prevention works. Lastly, the questions about the role of the respondent at the agency help cue the interviewer about the types of questions that he/she might be best to answer.</p>
<p>Understanding the Respondent's Knowledge <i>Section 3</i></p>	<p>This series of questions directly shapes the rest of the interview by getting the respondent to identify up front which topics he/she is most knowledgeable about. For example, some respondents might be able to talk in general terms about HPRP prevention decision making at the CoC level, but do not have insights into how the program was implemented at an agency or program level.</p>
<p>Previous Prevention Programs <i>Sections A and B</i></p>	<p>There are two different sets of questions for this domain: one for those answering "community" level questions, and one for those answering "program" level questions. The content is essentially the same but the wording is slightly different to make the questions appropriate for the respondent. It is important to understand HPRP prevention in the context of previous homelessness prevention for several reasons. First, it may have informed their decision-making about the structure of their HPRP program (i.e. evaluations of what worked well). Second, it may have put in place infrastructure and/or relationships that have implications for the implementation of HPRP homelessness prevention programs. Third, local communities previous experience may give them insights into important issues about the sustainability of prevention programs post-HPRP. We ask some questions about previous prevention on the web survey, but a complete narrative about previous experiences is critical to understanding this background more comprehensively.</p>
<p>Decision Making About HPRP Prevention <i>Section B</i></p>	<p>There are two different sets of questions for this domain: one for those answering community level questions, and one for those answering program level questions. The content is essentially the same but the wording is slightly different to make the questions appropriate for the respondent. The main thrust of these questions is to understand the level of inter-agency coordination for HPRP prevention. Some communities might have taken a "let 1000 flowers bloom" approach, while others may have imposed a common structure and discipline on all grantees, subgrantees, and sub-subgrantees in their network. These decisions have important implications for how HPRP was implemented on the ground and how it might be evaluated in the future. While we touch on this domain in the web survey, this narrative on how decisions were made lends itself much more easily to a semi-structured interview in which the subtleties of the process can be captured.</p>
<p>Target Populations <i>Section C</i></p>	<p>There are two different sets of questions for this domain: one for those answering community level questions, and one for those answering program level questions. Community level responses will provide insight into general trends and community-wide targeting strategies, while program-level responses will focus on how individual agencies</p>

	<p>targeted their services on the ground. HUD defined its own basic eligibility guidelines for HPRP; however, within that framework, agencies could choose to further define the target population for their services. No data are currently available on what percentage of grantees went beyond HUD's eligibility guidelines and how these agencies made their decisions about whom to serve. This information is key to understanding who are the beneficiaries of HPRP and also has important implications for the design of a future impact study of homelessness prevention. Asking about targeting efforts allows us to estimate the percentage of agencies that might be creaming, rather than targeting the hardest to serve. While agencies that make this choice are likely to see more positive outcomes for their homelessness prevention clients, the program may not actually be preventing homelessness since the people served are not likely to have become homeless without the assistance. In contrast, agencies that choose to direct homelessness prevention services to "hard-to-serve" clients—those at highest risk for homelessness—may have more mixed results for their prevention program but actually be <i>preventing</i> homelessness.</p>
<p>Eligibility, Points of Entry, and Screening <i>Section D.</i></p>	<p>There are two different sets of questions for this domain: one for those answering "community" level questions, and one for those answering "program" level questions. Community level responses are important for understanding the degree to which there is a coordinated system organized by the CoC and/or other local homelessness response networks. The "program level" responses will help us understand the degree to which practice on the ground is consistent with community standards. The entry-points to HPRP homelessness prevention services (e.g., other agencies, community helpline), the method of entry (e.g., outreach vs. third party referral vs. self-referral), as well as the timing of entry (e.g., before leaving a facility or program vs. at the time of crisis) also help to define the population that are then screened for program eligibility. In this way, agencies structure their intake procedures to serve the most likely to succeed clients or to assist the hardest to serve. Each of these choices, has important implications for future evaluations of homelessness prevention (see explanation in above section on HPRP Eligibility and Targeting). We will gather some important quantitative data on this through the web survey, but these more qualitative questions in the site visit guide will help us better understand how clients access and move through the system, the procedures that are used by different actors within the system, and the system's strengths and weaknesses.</p>
<p>Assessment & Triage <i>Section D</i></p>	<p>There are two different sets of questions for this domain: one for those answering "community" level questions, and one for those answering "program" level questions. Community level responses are important for understanding the degree to which there is a coordinated system organized by the CoC and/or other local homelessness response networks. The "program level" responses will help us understand the degree to which practice on the ground is consistent with community standards. Assessment and triage practices, like eligibility screening and points of entry (described above) have important implications for future evaluations of homelessness prevention efforts because they determine whether those who receive services are actually those most at-risk of experiencing homelessness. We will gather some important quantitative data on this through the web survey, but these qualitative questions in the site visit guide will help us better understand how people move through the system, the procedures that are used by different actors within the system, and the system's strengths and weaknesses.</p>
<p>Prevention Services</p>	<p>There are two different sets of questions for this domain: one for those answering</p>

<p><i>Section E</i></p>	<p>“community” level questions, and one for those answering “program” level questions. Community level responses are important for understanding the degree to which there are established program activities across the CoC and/or other local homelessness response network. The “program level” responses will help us understand the subtleties of homelessness prevention activities on the ground. The web survey will provide an overview of the rough structure and duration of rental assistance, which other types of financial and support services are available, and how case management is used (e.g., timing, duration, method, intensity), but the site visit interviews will explore how decisions are made about the package of services and assistance that a given client receives as more detailed information about the structure of financial assistance and the interactions between client and provider (i.e. case management) can be collected. Understanding the details of how homelessness prevention programs are run is key to both future planning of prevention efforts and structuring/designing a meaningful impact evaluation.</p>
<p>Monitoring & Data <i>Section F</i></p>	<p>There are two different sets of questions for this domain: one for those answering “community” level questions, and one for those answering “program” level questions. Community level responses are important for understanding the degree to which data gathering and evaluation are coordinated across the CoC and/or other local homelessness response network. The “program level” responses will help us understand practices unique to individual agencies. In order to design a feasible impact study for homelessness prevention, it is key to understand the capacity of both the community and individual agencies to gather and provide data necessary for use in random assignment, tracking clients and outcomes after their services have ended, and understanding the type and depth of services received. Some information about data will be gathered in the web survey, but the site visit interviews will allow us to have a better feel for the challenges that agencies experience with their systems that may affect data quality and/or scope.</p>
<p>Effectiveness of HPRP & Plans for the Future <i>Section G</i></p>	<p>There are two different sets of questions for this domain: “community” and “program” level. “Community” respondents will be asked about prior experience with systems-wide evaluation efforts for homelessness prevention, while “program” respondents will be asked about their own agency's experiences tracking outcomes of clients. Finding out more in-depth about community and agency capacity to evaluate homelessness prevention provides information vital to designing a feasible impact evaluation for HUD. These questions also solicit anecdotal feedback on the effectiveness of the program that will help inform future program design (i.e. what seemed to work well, what didn't). Some minimal information about this domain will be gathered in the web survey, but the site visit interviews will allow a more nuanced assessment of community/agency capacity and important initial feedback about program effectiveness that cannot be solicited with another method.</p>

A3. Use of automated electronic, mechanical or other technological collection techniques to reduce burden

No automated, electronic, mechanical, or other technological data collection techniques will be employed in conjunction with the site visits.

A4. Efforts to identify duplication

During the process of designing the survey instrument, the research team carefully reviewed the data HUD currently collects through QPR, IPR, APR and IDIS (see Section A1 for further detail), and made sure that none collect the kinds of data this survey will provide. HUD, the Urban Institute, and its subcontractors are not aware of any other national studies of HPRP. An extensive review of the literature by UI revealed no other studies collecting the same information evaluating HPRP or any other systematic study of homelessness prevention on a national scale, so the survey will produce the first quantitative data on how communities are implementing HPRP prevention programs across the country.

There are limits to the types of information we can collect via a web survey. The purpose of the site visit is to capture richer data about specific questions. Using open-ended questions, these qualitative interviews will allow us to have a guided conversation with key informants. It is important to emphasize that the site guide is designed to be adapted for a wide variety of respondents. No single respondent will be expected to answer all of the questions and probes contained within it. For example, interviews with Community of Care staff will likely be limited to “community” level questions only, while interviews with staff in a nonprofit subgrantee will cover program level questions almost exclusively. Similarly, we may speak with IT or data/research staff at one of the agencies and restrict their interview to questions centering around monitoring and data only.

A5. Methods to minimize the burden on small businesses or other small entities

We expect that some of the subgrantees may qualify as “small entities” and we are mindful of minimizing the reporting burden on their small staffs. For the site visits all in-person interviews will be scheduled at the convenience of the key informants. At the beginning of the site protocol, we also take care to identify up front which types of questions each respondent is equipped to answer in order to restrict the scope and length of the conversation. Also, in cases where we are visiting an agency that responded to the web survey either as a grantee or subgrantee, we will not repeat questions that staff have already answered.

A6. Consequences if data are not collected

This will be the first comprehensive study of HPRP or any other homelessness prevention strategy. The web survey is the only part of this study that would collect nationally representative data from grantees and subgrantees. Failure to collect web survey data will result in insufficient information about how HPRP grantees designed and implemented the program. This information is critical to ongoing assessment, including identifying appropriate output and outcome measures and refining existing reporting requirements. It will also help inform policymakers about how states and local governments used ARRA funding. While HUD Performance Reports provide valuable information on HPRP, descriptions of program activities and actual, rather than projected, outputs and outcomes are limited.

Lack of data collection through site visits would render it difficult for HUD to make future programmatic decisions as well as necessary adjustments (e.g. provide more technical assistance, resources) to make homelessness prevention programs most effective. Data gleaned from the site visits is also critical to designing a subsequent study to rigorously evaluate the impact of homelessness prevention activities.

Finally, the recently enacted HEARTH Act will provide communities with the opportunity to dedicate more homeless assistance resources than ever before to homelessness prevention through the new Emergency Solutions Grant (ESG) Program. The provision of guidance, best practices, and the development of evidence-based programs will be critical to the most efficient and effective use of this new funding stream for homelessness prevention.

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. Federal Register Notice⁸

In accordance with 5 CFR 1308.8 (d) a *Notice* will be published in the *Federal Register* announcing HUD's intention to request OMB review of this data collection effort and soliciting public comments. A draft of the Federal Register Notice is included in Appendix B.

A9. Remuneration to respondents

No payments are being made to HPRP grantee and subgrantee respondents who voluntarily agree to participate in site visit interviews.

A10. Assurances of confidentiality

As previously indicated, the survey data collection will be conducted by Abt Associates' survey group, Abt SRBI under subcontract to the Urban Institute. The Urban Institute maintains an Institutional Review Board (IRB) to ensure that research practices and procedures effectively protect the rights and welfare of human subjects, consistent with the requirements set forth in Title 45, Part 46 of the *Code of Federal Regulations* (45 CFR 46). The Urban Institute's policy is that all research involving human subjects, not just research sponsored by federal government agencies that have adopted the Common Rule under 45 CFR 46, must adhere to the following principles, among others:

- Risks to human subjects from research must be reasonable in relation to anticipated benefits, and must be minimized to the extent possible;
- Human subjects must be fully and accurately informed of the nature of the research in which they will be involved, whether their participation is mandatory or voluntary, any consequences of non-participation, any risks associated with their participation, and how the research will be used;
- Adequate provision must be made to protect the privacy of human subjects and to maintain the confidentiality of data that are collected, where promised and as appropriate.

In accordance with these policies, we will maintain the following procedures. First, before they agree to participate, all research subjects will be given a clear overview of the study and its goals, the data security plan, the staff confidentiality agreement, and our methods for safeguarding anonymity in our reports and publications. In addition,

⁸ Please note, HUD staff will fill in this information as it becomes available.

we will stress the *voluntary* nature of their participation and make clear to all parties that there are no negative consequences for their person or agency should they choose to *not* participate. All grantees and subgrantees sampled for the web survey will receive this information in a formal letter with the signature of the PD&R Assistant Secretary and HUD's logo; respondents will signal their consent by logging on and answering survey questions. For the **site visit** interviews, we will provide an oral overview of all the above points as an introduction to the interview guide and will obtain oral consent from all participants.

Second, we will take care to safeguard the information gathered from participants in this research effort. The data gathered from the web survey will be analyzed and discussed exclusively in aggregate; no published reports using the web survey data will single out any particular agency. Similarly, everything that key informants share in **site visit** interviews will be treated as confidential—that is, no comments will be attributed to them as individuals. Because we expect to produce both case study and cross-site analyses of themes, however, it is likely that the comments may be associated with a particular site. In these cases, we will take special care with particularly sensitive information to ensure that it cannot be traced back to a particular respondent.

HUD has statutory authority to offer confidentiality in research studies as established in the Housing and Urban Development Act of 1970, Title V, Research Technology, Sec 504, 1565, which states:

(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.

A11. Questions of a sensitive nature

While the agencies we plan to study serve vulnerable populations, we will not gather any data on individuals or families seeking assistance from HPRP grantees or subgrantees. Our data collection methods all focus exclusively on documenting the homelessness prevention programs themselves. None of the related substantive domains covered are considered private⁹ or sensitive.¹⁰ Questions asked of key informants during the site visits will be limited to those focusing on the functioning of the homelessness prevention program and agencies' service delivery and data system. This can be easily verified through a review of the data collection instrument included in the appendices of this document.

However, some of the entities will be private-for-profit businesses or nonprofit organizations that may consider some information about their businesses or organizations to be proprietary. Respondents will be informed that participation is voluntary, that they can decline to answer any question without consequence, and that their identity will be kept confidential, with answers only reported in the aggregate.

A12. Estimates of the burden of the collection of information

⁹ "Private" data include data on behaviors or on records that an individual could reasonably expect would not be observed or made public.

¹⁰ "Sensitive" data include data that if made public could cause physical, mental, emotional, economic, or other harm (including to their employment standing or reputation) to an individual.

A12.1. Estimate of respondent burden hours

For the 8 remaining **site visits**, we expect to speak with 5 to 10 key informants in each community.¹¹ Individual conversations will take place in the administrative offices of homelessness prevention providers and partner agencies and will vary substantially in length, anywhere from 30 minutes to an hour. Using the averages for each of these factors, we estimate the total reporting burden for this stage of data collection to be 45 hours (8 sites x 7.5 key informants x 45 minutes).

A12.2. Total annual cost burden to respondents

In order to calculate the total annual cost burden to respondents, the Urban Institute used Occupational Employment Statistics from the U.S. Department of Labor's Bureau of Labor Statistics to identify the median hourly wages (as classified by Standard Occupational Classification, SOC, codes) for the type of respondent most likely to participate in each stage of data collection. See Exhibit 4 for more detail.

EXHIBIT 4. Estimated Median Wages of Homelessness Prevention Study Respondents

Social and Community Service Managers (Avg)	11-9151	\$30.19
General	11-9151	\$27.21
Local Government	11-9151	\$32.24
State Government	11-9151	\$31.11
Computer and Information Systems Managers (Local Government)	11-3021	\$54.61
Source: Occupational Employment Statistics, U.S. Department of Labor		

The site visits will likely include the same type of program management staff at grantee/subgrantee agencies as well as at agencies that lead the local Continuum of Care (CoC), the Ten Year Planning Effort to End Homelessness, and mainstream programs like TANF, child welfare, human services, etc. In addition, we may speak with the data managers who run local HMIS programs (1 in each site). We estimate that the total cost of speaking to the data professionals will be \$327.66 (8 sites x 1 data manager x 45 minutes x \$54.61); the total cost of conversations with program management staff equals roughly \$1,358.55 (8 sites x 7.5 staff x 45 minutes x \$30.19). Thus, we expect respondent costs for participating in the site interview to total \$1,686.21.

A13. Total annual cost burden to respondent or record keepers

There are no capital/start-up or ongoing operation/maintenance costs associated with this data collection.

A14. Estimate of annual cost to the government

The total cost to the federal government for the site visits is \$168,500, which includes labor (indirect costs and fees in labor rates) and direct costs.

¹¹ "Sites" will include at least one grantee, but may include two or more grantees and multiple subgrantees within the community

A15. Reasons for any program changes or adjustments

This submission is a request for approval of site visit interviews that were already cleared under an emergency review which expires on January 31, 2012 (OMB Control #2528-0270).

A16. Plans for tabulation, analysis, and publication

A16.1 Plans for tabulation

Not applicable.

A16.2 Plans for analysis

Site Visits

The first stage of data analysis is to write case studies reflecting the findings from each of the 15-18 sites, as required by HUD. Individual case studies will describe and analyze the following:

1. Brief community description
2. HPRP prevention activities in the context of the community's response to homelessness
3. Scope of approach to prevention—community-wide or other
4. Pathways to HPRP prevention services
5. Eligibility criteria, screening and assessment procedures
6. Targeting
7. HPRP prevention activities offered, and allocations among households and activities
8. How do the agencies doing the direct HPRP prevention assistance determine the types and length of assistance?
9. Data collection activities and use of data to monitor or shape programs; availability of outcome data to document success
10. What happens after HPRP?

Once all site visits have been completed and draft case studies revised in response to key informant reviews, we will hold a 1.5 day meeting of the process evaluation team, with representatives from the web survey team, to begin the second stage of the process analysis—examining results across sites to see what we can conclude about how HPRP programs work and what might be worth passing on to other communities. We anticipate spending up to an hour on each of the following principal themes:

- HPRP prevention activities in the context of the community's response to homelessness
- Scope of approach to prevention—community-wide or other

- Pathways to HPRP prevention services
- Eligibility criteria, screening and assessment procedures
- Targeting
- HPRP prevention activities offered, and allocations among households and activities
- How do the agencies doing the direct HPRP prevention assistance determine the types and length of assistance?
- Data collection activities and use of data to monitor or shape programs; availability of outcome data to document success
- What happens after HPRP?
- Possible typologies and their utility; conclusions, lessons learned, challenges, recommendations (if any)

A16.3 Plans for publication

Data from the process and feasibility studies—the HUD performance reports, web survey, key informant discussions, expert panel—will be analyzed, integrated, and summarized in a final report. The final report will provide the first national description of HPRP grantees/subgrantees and the extensive in-depth site descriptions about a handful of communities that are implementing innovative homelessness prevention practices.

A 16.4 Time Schedule

- Site visits, 1/20/2012 – 3/20/2012

A17. Approval to not display the OMB expiration date

Not Applicable. Abt SRBI will display the expiration date for OMB approval of the information collection on all instruments and correspondence with prospective respondents.

A18. Exception to the certification statement

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