

Part A. Justification

A1 Circumstances That Make the Collection of Information Necessary

The Housing Choice Voucher (HCV) program is the federal government's largest low-income housing assistance program. As of 2010, the Housing Choice Voucher program serves more than 2 million households, at a total subsidy cost of \$18.2 billion per year. The HCV program is administered federally by the U.S. Department of Housing and Urban Development and locally by approximately 2,400 local, state, and regional housing agencies, known collectively as public housing agencies (PHAs). Funding for the HCV program is provided entirely by the federal government. The funding that PHAs receive includes the housing subsidy itself, plus administrative fees to cover the costs of running the program.

When the voucher program was first implemented in the 1970s, the system for reimbursing PHAs for the costs of program administration was loosely based on empirical evidence. Over time, however, the system for estimating and allocating fees has become more complex and—in some ways—more arbitrary, as HUD and Congress have tried to balance fairness with cost savings, while trying to avoid large year-to-year swings in funding for PHA staffs. The *Housing Choice Voucher Program Administrative Fee Study* is designed to evaluate the amount of funding needed to administer the voucher program based on direct measurement of the work actually performed by voucher administrators. The study will measure and identify the tasks performed by PHA staff to meet program requirements, to assist voucher holders in finding and renting suitable housing in a timely way, and to ensure that a broad range of affordable rental housing throughout the community is available to voucher families. The study will identify the costs involved in each task, including salaries, benefits, and overhead. Ultimately, the findings of the study will be used to inform the development of a new formula for allocating HCV program administrative fees.

The study is being carried out in three phases. The first phase was a *reconnaissance phase* which focused on identifying candidate sites for a national study of program administrative costs, understanding the tasks commonly performed by PHA staff to administer the program, collecting data on variations in program administration and local cost drivers, and evaluating different methods of measuring staff time spent on voucher program administration. The main data collection activity for the first phase of the study was site visits to a sample of 59 PHAs believed to operate high-performing HCV programs. The main product of the reconnaissance phase is a research design for the full national study, including a sampling plan, data collection instruments, and analysis plan, and a request for OMB approval to conduct the national study.

The second phase is a *pretest* of the data collection methodology for the national study of administrative costs. The pretest will take place at four PHAs in early 2012.

The final phase of the study is the *full national study*. The research design for the full national study is being developed based on the findings from the reconnaissance phase. HUD expects the study to involve collection of data on the costs of HCV program administration from a national sample of up to 60 PHAs that operate effective and efficient HCV programs. At these 60 PHAs, the study team will collect data on the time that frontline staff spend on the complete set of activities needed to administer the HCV program effectively using Random Moment Sampling (RMS). Additionally, the

study team will conduct telephone interviews and site visits to collect data on the cost of staff time in terms of salaries and fringe benefits as well as the total frontline and overhead costs of administering the program, including personnel costs, other direct costs, and indirect costs.

The main goals of the full national study are to measure the costs of administering a high-performing and efficient HCV program and to use the information to assist the Department of Housing and Urban Development (HUD) in developing a new formula for allocating HCV administrative fees. The final phase of the study will begin in late summer 2012 and will be completed in 2014.

The purpose of the present OMB request is to obtain approval for additional on-site data collection to support the full study of the Housing Choice Voucher Program Administrative Fee Study. The purpose of these site visits is to identify additional candidate sites for the full national study. From the reconnaissance phase, we identified 31-35 PHAs that met the study criteria for high performance and efficiency and that have large enough HCV programs to be considered for the full study.¹ Our current sampling plan for the full study calls for collecting data from up to 60 PHAs. As a result, we need to identify an additional 25-29 PHAs that meet the study's criteria for high performance to be included in the full study, plus several more PHAs to serve as backup agencies in case any of the PHAs approved in the reconnaissance phase declines to participate (so we need to identify approximately 34 PHAs in total). This OMB request is to conduct site visits similar to those done in the reconnaissance phase at up to 45 PHAs to identify another 34 PHAs for potential inclusion in the full study.

A2 How and by Whom the Data Will Be Used

A2.1 Project Overview

The purpose of this project is to select additional high performing and efficient HCV programs to achieve a data collection sample of up to 60 programs for the full national study that is representative by size, location and program type. The results of the national study, to be conducted under a subsequent task order and with separate OMB approval, will form the basis for developing a new administrative fee formula for the HCV program.

A portion of the sample PHAs were generated through the study reconnaissance phase – PHAs with at least 100 vouchers that were confirmed as being high performing and efficient during the site visit. This process yielded a group of 31-35 HCV programs that could be included in the time measurement portion of the full study (the range reflects the fact that the minimum program size for inclusion in the study is still under consideration). In order to arrive at a study sample of up to 60 HCV programs, approximately 34 programs need to be recruited into the study. The study team estimates that up to 45 additional high-performing programs will need to be visited because, based on the findings from the reconnaissance phase, we expect that about three-quarters of these programs will meet the study criteria. In addition, we need to oversample programs to allow for some agencies from the reconnaissance sample to decline to participate in the full study.

¹ Overall, 45 of 59 PHAs met the study's high-performance and efficiency criteria, but 8 are likely to be too small for inclusion in the full study (less than 100 vouchers) and 2 dropped out. Another 4 PHAs may be too small for inclusion in the full study (less than 250 vouchers), but this is being tested in the study's pretest.

The sample for additional on-site data collection will generally be selected in a manner similar to the reconnaissance sample. The sample will be drawn using random stratified sampling from the universe of HCV programs that were designated as “high performers” by HUD’s Section Eight Management System (SEMAP) in 2007, 2008, 2009, or 2010. HCV programs with “High Performer” ratings on SEMAP in three of the past four years (2007-2010) will be screened into the study universe. For PHAs that don’t have SEMAP certification for all four years, only programs that are SEMAP high performers in all the years that data were reported will be included. Programs with fewer than 100 units, PHAs in the Moving to Work (MTW) demonstration, and those that were part of the reconnaissance phase will be excluded. Also excluded will be PHAs that were rejected during the field office review for Task Order 1 and that declined to participate during the reconnaissance phase.

Using these criteria, the study team will select an initial sample of 135 potentially high-performing PHAs to begin recruiting agencies to the supplemental study with the goal of conducting site visits to up to 45 agencies.² A starting sample of 135 PHAs allows for backups should an agency decline to participate or be screened out by HUD headquarters and Field Office staff. HUD headquarters and Field Office staff will be asked to verify that the agencies sampled are high performing and have no outstanding audit or fair housing findings. (The sampling plan for the study is described in detail in Section B1.)

Once the sample of 135 potentially high-performing agencies has been selected, HUD will send letters to 45 of the 135 inviting them to participate in the study. Study team staff will follow up with telephone calls to explain the study and confirm each agency’s willingness to participate. Agencies that decline to participate will be replaced by the next closest match until a sample of 45 agencies is reached.

The study team will conduct site visits to each of the 45 agencies to confirm that their HCV programs are high-performing. The goal is to identify approximately 34 that meet the study’s performance criteria.³ The on-site protocol and performance criteria will be the substantially the same as used during the first reconnaissance phase (OMB Control Number 2528-0267), except that the PHA interview protocol is shorter, eliminating all questions that do not directly relate to program performance and questions identified as duplicative or ineffective during the first round of data collection.⁴ Site visitors will spend a half-day to a day interviewing PHA staff and a day to a day and a half conducting file reviews. To measure cost efficiency, the plan is to gather estimates of FTEs for

² The final number of PHAs to be visited will be determined based on how many meet the study criteria and agree to be part of the study. We expect to visit at least 35 agencies, and up to 45. The remainder of this request assumes the maximum of 45.

³ The number of additional agencies that need to be recruited may change somewhat closer to the start of data collection for the full study. Some of the agencies determined to be suitable for inclusion in the full study may be unable or unwilling to be part of the study once it comes time to confirm their participation. The number of additional programs to be screened depends in part on the level of attrition from the first phase of the study.

⁴ For the 59 reconnaissance site visits, the study team asked a series of questions about program processes and cost drivers that were need to help design the full administrative fee study; these questions can be eliminated under for the purposes of recruiting additional agencies to the study because the full study design will largely already be in place.

staff that are working directly with the administering the HCV program. Appendix C provides the data collection instruments to be used on site.

PHAs will not be compensated for their time spent on these site visits, but will be compensated if they participate in the full national study.

Pending OMB approval, site visits will begin in April 2012.

A2.2 Purpose of the Data Collection

We are requesting OMB approval for two data collection activities that will occur through site visits to the PHAs selected for the study:

- 1) Interviews with PHA staff at up to 45 PHAs.
- 2) Review of a sample of client files at up to 45 PHAs.

Interviews with PHA Staff

Similar to interviews conducted during the reconnaissance phase, the study team proposes interviewing key staff administering the voucher program at each of the 45 PHAs. The number of interviews with program staff will depend on the size and staffing structure of the individual HCV programs, but at a minimum, the site visitor team would expect to interview the HCV program manager, key supervisory staff, and an HQS inspector. The interviews will be conducted in person using an interview topic guide. (A copy of the topic guide for interviews with PHA staff is provided in Appendix C.) The purpose of the interviews is to obtain detailed information on:

- The PHA's approach to program functions necessary to operate a high-performing program. These include: waiting list management, client intake and recertification, rent reasonableness tests, Housing Quality Standards inspections, payment processing, portability processing, program and financial monitoring, reporting, vendor management, customer service, quality control, terminations and appeals, expanding housing opportunities, and landlord relations. (PHA performance on these and other critical functions will also be assessed through file reviews.)
- Special circumstances that affect voucher program operations and efficiency at the PHA, including factors associated with the size of the PHA, shared administrative functions with other PHAs, and special programs.
- Aspects of HCV program administration that staff report to be particularly efficient or inefficient.

This information obtained through the PHA interviews will be used primarily to identify potential additional sites for the full national study.

File Review

While on site, the site visitor teams will review approximately 25 client files: 10 files from among those clients who have gone through the PHA's intake procedure but may not necessarily have leased up, and 15 files from clients under lease. To the extent possible, we will select a random or unbiased set of files for review. The purpose of the file review is to confirm the accuracy of the PHA's

statements and self-certifications in key areas related to high performance. In particular, we will use file review to help assess whether the PHA:

- Verifies each household's eligibility for applicable selection preferences before providing assistance.
- Does not make payments for new units until (initial or move) before the unit has passed inspection.
- Follows its rent reasonableness protocol and adequately documents rent reasonableness decisions.
- Conducts and documents income verification correctly.
- Uses EIV and keeps a copy of the EIV printout in the file (if permitted by state law).
- Calculates household income is calculated correctly, including the appropriate deductions.
- Correctly applies contract rent, payment standards, and utility allowances, and follows its stated policy regarding rent increases.
- Maintains complete and well-organized client documentation.

We will use structured file review protocols and file review worksheets to conduct the file review and document our findings in each of the areas. Copies of the file review worksheets are provided in Appendix C.

A2.3 Who Will Use the Information

HUD and the research team will use the information collected to identify additional PHAs that meet the study's criteria for high performance and will be invited to participate in the full national study. The data collected through the national study (which will be covered by a separate OMB request) will be used to estimate the costs of administering the HCV program and to develop a new formula for allocating administrative fees in the HCV program.

A2.4 Instrument Item-by-Item Justification

Exhibit A-1 describes the target respondents, content, and reason for inclusion for the interviews with individual PHA staff and file review activities. The topic guide for the PHA interviews and the file review worksheets can be found in Appendix C.

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

Instrument(s)	Respondents, Content, and Reason for Inclusion
<p>Topic Guide for Interviews with PHA Staff</p>	<p>Respondents: HCV program manager and supervisory staff at 45 PHAs</p> <p>Content:</p> <ul style="list-style-type: none"> • Voucher allocations and program components • Staffing • Utilization and success rates • Program monitoring • Quality control • Wait list management • Intake and Briefings • Recertification and termination • Tenant moves and portability processing • Housing quality inspections • Rent reasonableness • Expanding housing opportunities • Customer service • Use of Information Technology • Questions for the HCV Director <p>Reason: To determine whether the HCV program is high-performing and efficient.</p>
<p>File Review Worksheets</p>	<p>Site visitors will fill out a worksheet during file review</p> <p>Content:</p> <ul style="list-style-type: none"> • Presence of eligibility documents in the file. • Income, Expense and HAP Determinations. • Voucher issuance/leasing documents for the correct unit. • General compliance with program regulations. <p>Reason: To determine whether necessary documentation is in the case files.</p>

A3 Use of Improved Technologies

The interviews with PHA staff and file reviews will be conducted in person and with minimal use of technology.

A4 Efforts to Avoid Duplication

The 45 PHAs selected for site visits will be part of the pool of sites for the full national study. Where possible, information collected through these visits will be retained for use in the full national study and updated as necessary.

A5 Involvement of Small Entities

Some PHAs participating in the study will be small entities. In setting up the site visits, we will work closely with the staff of the smaller agencies in the study to make sure that the data collection is done most efficiently and with the least burden on staff. We have a representative from a small PHA on the Expert and Industry Technical Review Group created for the study who has reviewed the data collection approach and instruments.

A6 Consequences of Less Frequent Data Collection

The site visits (and associated data collection) will only be completed once for this part of the study. Additional data collection for the full study will be the subject of a subsequent request for OMB clearance.

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

The data collection approach and instruments for this project were developed in consultation with an Expert and Industry Technical Review Group (EITRG) consisting of PHA staff, housing researchers, industry representatives, time measurement experts, and an expert on low-income housing and special needs populations. The EITRG reviewed the data collection approach and instruments described in this OMB request in November 2011.

In accordance with the Paperwork Reduction Act of 1995, the Department of Housing and Urban Development provided to OMB a notice for publication in the Federal Register announcing the 60-day notice for public comment on the proposed data collection on October 18, 2011 (76 FR 64366).

A9 Payments to Respondents

We will not be compensating the PHAs for their participation in the site visits described in this OMB request. We think that PHAs will be willing to participate in the study because they will want to provide their input into the determination of the administrative fee formula. However, we will provide payment to PHAs participating in the full national study, which we expect to involve more PHA staff time. Payment to PHAs for participation in the full national study will be discussed in the separate request for OMB approval that we will prepare for that study.

A10 Arrangements and Assurances Regarding Confidentiality

HUD's contractor, Abt Associates, takes seriously the responsibility to protect the subjects they interview. Abt Associates' Institutional Review Board (IRB) conducted an informal review of the project in December 2010 and determined that the project does not require further review by the IRB because it does not meet the definition of research under the federal human subject regulations. The purpose of the project is to develop an administrative fee formula, rather than to create generalized knowledge.

Participating PHAs will be notified that the information collected through interviews and on-site data collection will be used for this study only and not for any other purpose. They will be told (through the advance letter, telephone script, and introductory language for the PHA interviews) that none of the information they provide to the research team during any phase of the study will harm or count against their agency in any HUD performance assessment or funding decisions. They will also be told that in the unlikely event that a violation of program regulations is uncovered as part of the site visit, the research team will inform HUD, and HUD will then notify the agency but will not take further action unless the agency continues to operate the program in violation of the regulations. A copy of the study advance letter is provided in Appendix A and a copy of the telephone script is provided in Appendix B.

A11 Sensitive Questions

The data collection instruments prepared for this study do not contain any sensitive questions, although some PHA staff may be reluctant to provide information perceived to reflect negatively on their HCV program or agency. Interviewers will be trained to be sensitive to respondents' concerns and to remind respondents that none of the information they provide to the research team during any phase of the study will harm or count against their agency in any HUD performance assessment or funding decisions.

A12 Estimate of Annualized Burden Hours

Exhibit A-2 provides information on the estimated time necessary to complete the data collection to for the additional site visits. Up to 5 PHA staff at each of the 45 study sites will be involved in the data collection (up to 225 respondents in total). Together, it is estimated that the PHA staff at each site will spend up to 12 hours preparing for the site visit and up to 16 hours being interviewed or otherwise assisting the research team during the site visit. The total burden for each PHA is 28 hours. The total estimated burden across all PHAs is 1,260 hours.

Exhibit A-2. Respondent Burden

	A	B	C	D	E	F	G
Data Collection Activity	Number of Respondents	Average Burden per Respondent (minutes)	Total Annual Burden (minutes) (A*B)	Number of Responses per Respondent	Total Respondent Burden (Minutes) (C*D)	Total Burden per Respondent (Minutes) (B*D)	Total Respondent Burden (Hours) (E/60)
PHA staff (interviews and file review prep)	225 (on average 5 respondents per site, 45 sites)	336 (28 hours per PHA)	75,600	1	75,600	336	1,260
Total							1,260

A13 Estimated Record Keeping and Reporting Cost Burden on Respondents

There is no cost to respondents other than the time required to prepare for the site visits and complete the interviews.

A14 Estimated Cost to the Federal Government

The total contract amount for the full study is \$4,741,036. Of this total, approximately \$350,000 will be used for the data collection activities described in this request.

A15 Reasons for Changes in Burden

This submission to OMB is a new request for approval; there is no change in burden. This request is part of a multi-phase study with four separate requests for approval. The first approval was sought and received for the initial reconnaissance to 60 PHAs, the second approval was sought and received to pretest the full study design, the current approval is for additional reconnaissance at 45 PHAs (very similar to that conducted in the first phase), and the fourth approval will be for the full study in which up to 60 PHAs will participate.

A16 Tabulation Plan, Statistical Analysis, and Study Schedule**A16.1 Tabulation Plan and Statistical Analysis**

The work conducted in this phase of the study will not include statistical analysis. The goal for this phase is to confirm (or deny) the high-performing and efficient status of the group of 45 HCV programs selected for supplementary site visits and to understand the drivers of HCV program administrative costs, rather than to generate national estimates of administrative fees. The estimation of administrative fees will be done under later task order through the full national study.

For the supplementary site visits, we will follow a rigorous protocol at each of the sites to ensure that all sites are assessed in a similar manner and to collect consistent information across sites on program costs.

All HCV programs visited will be evaluated for their performance based on common criteria. Exhibit A-3 presents the main metrics for evaluating PHA performance. We will collect FTE estimates through interviews with PHA staff to evaluate the efficiency of the HCV programs in the sample.

Exhibit A-3. Metrics for Evaluating PHA Performance

Performance Area	Standard for High Performance	Source
A. Consistently achieving High Performer status under HUD’s SEMAP system and other preliminary screens are a prerequisite for inclusion in the sample		
SEMAP High Performer or Field Office Nomination	The PHA received a “High Performer” rating in SEMAP in 2007, 2008, 2009, and 2010 OR received a “High Performer” rating in all years scored between 2007 and 2010 if not scored every year, OR was nominated by a HUD Field Office as a high-performer.	
No outstanding major audit findings	Review of PHA audit history by HUD Field Office staff indicates that there are no unresolved major audit findings related to the HCV Program from audits done by Independent Public Accountants (IPAs).	
B. The site visits will confirm that the PHA has effective policies and procedures in place		
The PHA maintains an accurate, complete, and up to date waiting list.	<ul style="list-style-type: none"> Applicants are ordered on the waiting list in accordance with the PHA’s selection policies List includes information on local preferences (if used) Application dates are consistent with staff descriptions about the length of time applicants are on the list. The PHA updates the waiting list regularly. The frequency of updates is consistent with how quickly the PHA is running through its waiting list, the number of families that need to be considered to result in a positive eligibility determination, and the length of the waiting list. 	Review of waiting list; PHA interview
The PHA has effective processes for managing portability	<ul style="list-style-type: none"> The PHA has processing logs or a similar system for tracking incoming portability and outgoing portability. The PHA adheres to program timelines when receiving port-ins. The initial billing submissions are completed and mailed by the receiving PHA within 10 working days of the HAP contract execution but no later than 60 days following the expiration date of the family voucher issued by the initial PHA. 	Review of tracking log; PHA interview

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Performance Area	Standard for High Performance	Source
<p>The PHA conducts HQS inspections in a timely manner, provides adequate notification to owners, and takes appropriate action for failed or late inspections.</p>	<ul style="list-style-type: none"> • For any new unit (initial or move), payments were made only for a period beginning no earlier than the date the unit passed inspection. <i>[from PIC SEMAP indicator report]</i> • Program units receiving payments are re-inspected within 365 days of the last passed inspection. <i>[from PIC SEMAP indicator report]</i> • For units that fail inspection, the PHA has a process for informing the owner and tenant of the failure and the time within which repairs are required. • For units that fail for life threatening failures, PHA has a process for tracking that repairs are made within 24 hours or HAP payments are abated. • For units that fail for routine violations, PHA has a process for tracking that repairs are made within 30 days (or authorized extension) or payments are abated. • PHA has a certification protocol if it does not require reinspections. 	<p>PIC SEMAP Indicator Report; PHA interview</p>
<p>The PHA processes Request for Tenancy Approvals (RFTAs) within reasonable timeframes.</p>	<ul style="list-style-type: none"> • PHA has a process for tracking and monitoring the length of time between RFTA receipt and first inspection. • The timeframe between RFTA receipt and first inspection is within 15 business days for programs up to 1,250 units, and reasonable for larger programs. • If the timeframe exceeds 15 business days, PHA staff provide and can document the valid reasons why the turnaround time is longer. 	<p>PHA interview</p>
<p>The PHA makes efforts to expand housing opportunities for HCV tenants.</p>	<p>PHAs with jurisdiction in metropolitan areas meet the six criteria for SEMAP Indicator 7: Expanding Housing Opportunities (see Form HUD-52648).</p>	<p>Review of Admin Plan; Review of documentation; Review of maps; Review of briefing packet; PHA interview</p>

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Performance Area	Standard for High Performance	Source
The PHA follows a strong rent reasonableness policy.	<ul style="list-style-type: none"> • PHA has a clear written rent reasonableness policy. Policy takes into account factors that the PHA determines impact cost, such as location, size, type, quality and age, amenities, housing services and maintenance, and utilities provided by the owner under the lease. • Policy compares contract unit rent to similar unassisted rents and contract unit rent to similar units on the premises. • PHA has a rent database or other system to collect information on comparable units. • Database is updated regularly. • PHA does rent reasonableness before entering into a HAP contract, before an increase in rent, and if there is a 5% decrease in FMR 60 days before contract anniversary date. • Rent reasonableness decisions are documented in the client file. 	Review of Admin Plan or written rent reasonableness policy; PHA interview; File review
The PHA calculates total tenant payment, family share, and HAP correctly.	<ul style="list-style-type: none"> • File includes the required verifications. • Household annual income is calculated correctly, including the appropriate deductions. • The correct payment standard is used. • Correct utility allowance is used. • Correct voucher size is used. • Recertifications are completed annually and on time. • No other errors in errors in TTP, family share or HAP calculations. 	File review
The PHA monitors utilization and success rates.	<ul style="list-style-type: none"> • PHA monitors budget and unit utilization. • PHA uses HUD Projection spreadsheet for tracking utilization or an alternative tool or system. • PHA takes actions based on the findings from the utilization tool. • PHA monitors leasing success rates. • PHA takes action if leasing success rates are low. 	PHA Interview
The PHA demonstrates sound financial management practices.	<ul style="list-style-type: none"> • Whether the program has any Due To's and Due From's (HCV Programs should not have these longer). [from FASS Data] • Leasing/funding within budget (or resources such as NRA). • Maintaining suitable level of assets for costs (NRA, UNA levels). [from FASS Data] • PHA reports in a timely manner to PIC, FDS, and VMS. [from PIC, FDS, and VMS data] • PHA makes timely payments to landlords. • PHA has a clear conflict of interest policy. • PHA has a code of conduct. 	FASS data; PIC, FDS, VMS data; Payment history for sampled files; PHA interview
The PHA has effective communication with tenants and landlords.	<ul style="list-style-type: none"> • PHA has customer service protocols and standards for answering or returning calls from tenants and landlords. 	PHA interview

Performance Area	Standard for High Performance	Source
The PHA provides training for staff and management.	<ul style="list-style-type: none"> The PHA requires initial training of technical staff (housing specialists and inspectors) and regular follow up training on program regulations. The PHA has an effective method for communicating program changes to all technical staff. PHA has written standards of performance and expectations and an effective means to evaluate staff performance. 	PHA interview; Review of training protocols; Review of performance standards
Tenant files are well organized and contain adequate documentation, whether paper or electronic.	<ul style="list-style-type: none"> The PHA has a written file protocol. File review shows the protocols are followed and that files are well-organized. PHA has checklists for identifying what is in the file and what is missing. PHA has a written policy regarding the archival and destruction of old file material. 	File Review; Review of Admin Plan; Review of written policies
The PHA has an informed Voucher Program Director.	HCV Director demonstrates detailed knowledge of the HCV Program, its status, and current issues.	PHA interview
The PHA has rigorous program monitoring, reporting, and QC protocols.	<ul style="list-style-type: none"> Quality control/review activities are performed on key transactions/activities on a monthly basis. PHA monitors key reports provided through PIC and EIV, including deceased individuals, multiple subsidy, new hires, income discrepancy, alternate ID, and immigration reports. Discrepancies are resolved timely. PHA has at least 95 percent of households reported in PIC, and minimal fatal errors. <i>[from PIC data]</i> PHA has protocols for detecting and preventing fraud, mismanagement, waste and abuse of program funds. PHA has a written zero income policy. 	PHA interview; Review of past QC reports; PIC data

A16.2 Study Schedule

Under the current study schedule, the site visits will be conducted over a four-month period. Assuming OMB approval, the site visits are scheduled to begin in April 2012 and end in July 2012. The request for OMB clearance for the full national study of HCV program administrative fees will be prepared in April 2012.

A17 Expiration Date Display Exemption

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

A18 Exceptions to Certification

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