

Contract Number:
C-CHI-01120 CHI-T0001

Mathematica Reference Number:
06956

Submitted to:
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**Supporting Statement for
OMB Clearance of Study on
Housing for Youth Aging
Out of Foster Care**

Part A

March 30, 2012

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PART A: JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The Office of Policy Development and Research (PD&R) within the U.S. Department of Housing and Urban Development (HUD) is requesting Office of Management and Budget (OMB) approval to collect information from the public for a study of *Housing for Youth Aging Out of Foster Care*. Senate report language accompanying the 2009 Appropriation for HUD directed the Secretary to “conduct an evaluation of the housing models that are most effective in preventing and ending homelessness for youth aged 16-24.” Given the broad range of housing needs and experiences of youth ages 16-24 and the desire to focus this research effort on a segment of the population with an elevated risk of homelessness, HUD has decided to focus this specific research effort on the housing needs of the up to 30,000 youth who “age out” of the foster care system each year (U.S. Department of Health and Human Services 2009). A shortage of affordable housing has contributed to the problem of youth homelessness generally, but the risk of becoming homeless is especially high among foster youth who do not achieve permanency before leaving care.

In the absence of housing opportunities that foster youth can afford on their own, or the possibility of their receiving parental support, a pressing need exists to identify housing models that can prevent and end homelessness among this population. The goal of the study is to understand the issues associated with housing for youth aging out of foster care and strategies for addressing them. As a cornerstone of this project, HUD will conduct an in-depth review of the use of Family Unification Program (FUP) vouchers for this population. Currently, FUP, which is administered by the U.S. Department of Housing and Urban Development (HUD), is the only Federal program specifically dedicated to supporting housing costs for youth who have aged out of foster care. Public housing agencies (PHAs) who wish to participate in FUP must enter into a Memorandum of Understanding (MOU) with their public child welfare agency (PCWA) to serve as a partner in both identifying eligible families and youth for the program, and to provide supportive services. While the primary purpose of FUP is to provide housing vouchers to families for whom the lack of adequate housing is the primary factor for family separation (either imminent out-of-home placement of children and/or delays in family reunification), youth aged 18-21 who have left foster care at age 16 or older, and who do not have adequate housing, are also eligible for a time-limited housing voucher not to exceed 18 months. Little is known about the extent to which FUP vouchers are used to serve youth aging out of foster care, so this study will support a web-based survey of public housing agencies (PHAs) and their partnering public child welfare agencies (PCWAs) in communities that use FUP vouchers to identify which communities allocate vouchers to youth aging out of foster care and to obtain information on how FUP vouchers work for this population

Background and legislative requirements. The Federal Strategic Plan to Prevent and End Homelessness, developed by the U.S. Interagency Council on Homelessness (USICH 2010), includes clearly specified goals, objectives, and timelines for addressing the issue of homelessness through numerous initiatives. One of the specific populations identified as being at high risk for homelessness is foster youth aging out of care. A number of federal funding streams, under certain circumstances, can be used to provide housing for this population. These include programs administered by HUD (e.g., the McKinney-Vento Homelessness Assistance Act, Public Housing, Community Development Block Grants, the HOME Investment Partnerships Program, and the Homelessness Prevention and Rapid Re-housing Program). The U.S. Department of Health and Human Services also oversees several relevant programs that can be used to address housing and support needs for youth aging out of foster care, including the Transitional Living Program, the Chafee Foster Care Independence Program, the Education and Training Voucher Program, and the Fostering Connections to Success and Increasing Adoptions Act.

The objectives of this proposed study are to fill gaps in our understanding of housing options available to youth aging out of foster care, identify the various funding sources available to meet their housing needs, and gather information on the notable program models being implemented in communities across the country. The study will emphasize determining how communities use FUP vouchers to serve these youth, and to what degree. Gaining a better understanding of housing options for foster youth will help identify opportunities to mitigate their risk of homelessness as they transition out of care and will lead to recommendations for future research and evaluation.

Overview of the study design. This project aims to assess the extent of the housing need for foster youth and the nature of the challenges in providing housing assistance for individuals in this population as they age out of care. The study will incorporate data from new and existing sources, and use multiple data collection methods over a two-year period to assess the broad array of housing programs that address the needs of these youth and collect stakeholder and community perspectives.

The research design relies on a mixed-methods approach for assessing the housing models that address the needs of youth aging out of foster care. There are four primary goals of this study:

1. Define the nature and magnitude of the housing needs of youth aging out of foster care;
2. Identify and describe the range and dimension of housing programs for these youth;
3. Examine the types of funding mechanisms available to finance housing for these youth; determine the range of funding streams

being used for this purpose, including those from federal, state, local, and private sectors; and identify how these resources can be combined and what sector provides the majority of financial support; and

4. Determine to what extent and how FUP vouchers are being used to provide housing for such youth (this program is of particular interest because it requires cross-agency collaboration between PCWAs and PHAs and integrates housing assistance with other supportive services).

The study consists of one data collection effort that involves public burden and for which clearance is requested, namely a web-based survey of PHAs and PCWAs in communities using FUP vouchers. Topics covered in the survey pertain to:

- The community and agency contexts;
- Reasons for using, or not using, FUP to serve youth;
- How communities are using FUP vouchers to serve youth;
- How PHAs and PCWAs are partnering to identify youth in need and provide them with services; and
- Successes and challenges in using FUP, and other non-FUP strategies communities may use to serve the housing needs of youth aging out of foster care.

To facilitate the self-administered nature of the web-based survey, it will contain mostly close-ended items (with either quantitative or categorical response categories). For topics in which multiple perspectives are desired (for example, challenges to serving this population with FUP vouchers), the survey will ask the same questions of both PHA and PCWA staff. We summarize the questions by section for both surveys in Appendices B and D. The full survey instruments are located in Appendices C and E.

2. Purpose and Use of Information Collection

HUD will use the information from the survey to gain a comprehensive understanding of the extent to which the Family Unification Program (FUP) is used by communities to address the housing needs of youth aging out of foster care. Specific research questions include:

1. Which communities that have an allocation of FUP vouchers are choosing to serve youth aging out of foster care?
2. Why are communities choosing, or not choosing, to dedicate FUP vouchers to youth aging out of foster care?

3. For those communities that are serving youth aging out of foster care with FUP vouchers:
 - How are youth identified as candidates for a FUP voucher, and how does the referral process work?
 - What obstacles have communities encountered in identifying eligible youth and/or in securing housing units for youth? What steps have they taken to address those barriers?
 - How does the availability of FUP vouchers correspond to the number of youth potentially in need of housing assistance?
 - What services are provided to the youth and how are they financed?
- Are any of the FUP communities targeting youth tracking the outcomes of the youth who are served through the program?

The web survey sample frame consists of approximately 300 PHAs known to HUD as currently administering the Family Unification Program. Because it is not possible to determine through administrative data available to HUD *which* PHAs with an allocation of FUP vouchers are serving youth, the survey will be administered to all PHAs known to be administering FUP in order to identify those PHAs that are serving youth currently, or have served youth in the recent past. The PHA survey has been designed with three separate pathways or modules: one module for PHAs that are currently allocating FUP vouchers to youth aging out of foster care; one module for PHAs that previously allocated FUP vouchers for youth, but no longer do so; and one module for PHAs that serve families but who have never allocated FUP vouchers for youth aging out of foster care. The separate modules allow the respondent to answer only the questions that pertain to his/her PHA, and allow for the collection of data related to understanding *why* PHAs may be choosing to *not* serve youth aging out of foster care with FUP vouchers.

The PHA respondents who are currently administering the FUP to youth (rather than only to families) will be asked to identify the PCWAs with which they partner, and these PCWAs will also be surveyed. There is a lack of information on the number of PHAs that are allocating vouchers to youth, but we expect this to be roughly half of all PHAs administering FUP. We expect that there will be no more than one PCWA partnering with each such PHA, so we expect the respondent pool of PCWAs to total approximately 150. Thus, the total respondent pool for the survey, including eligible PHAs and PCWAs, is expected to be approximately 450 agencies.

The data collected from the survey will provide important details about programs that cannot be obtained through existing documents or from other sources. The survey will identify which communities allocate vouchers to youth aging out of foster care and obtain information on how the program works for this population, including service provided, funding streams, and

the nature of the PHA-PCWA collaboration. At this time, no other data sources address the goals of the project described under question #1 above, thereby necessitating this data collection activity. The body of research focusing on housing resources designed for youth aging out of foster care is limited, and there has never been a survey focused on the use of FUP for youth. This research effort seeks to fill gaps in our understanding of the range of housing resources available for these youth and set forth a research agenda for future evaluative efforts.

3. Use of Improved Information Technology and Burden Reduction

Both survey instruments, the survey to the PHAs and the survey to the PCWAs, will be administered via the web, and each instrument is expected to take no longer than 30 minutes to complete. The web instrument will offer the easiest means of providing data, as it will be programmed to automatically skip questions not relevant to the respondent; this approach will reduce respondent burden. The instrument will also allow respondents to complete the survey at a time convenient to them without the risk of their losing a paper survey questionnaire. Since the survey instrument will automatically skip to the next appropriate question based on a respondent's answers, the instrument will also provide high-quality data. If respondents are unable to complete the survey in one sitting, they may save their place in the survey and return to the questionnaire at another time. In addition to offering the web instrument, participants may request a paper (mail or fax) questionnaire or receive telephone assistance in completing the survey from the contractor's facility liaison.

The contents of each survey instrument (the PHA survey and the PCWA survey) were mapped to the research questions forming the project's goals. This comparison enables HUD to see plainly which survey items are required for the data collection to adequately address the research questions of interest. The process also identifies any unnecessary items that can be deleted from the instruments. This procedure ensures the thoroughness of each instrument, while collecting only the minimum information necessary for the project's purposes.

4. Efforts to Identify Duplication and Use of Similar Information

No systematic data collection has been conducted pertaining to the use of FUP vouchers for foster youth. For this reason, the survey focused on this issue will be entirely new. Nevertheless, HUD recognizes that some of the study's research questions and data collection items can be informed by a review of existing documentation on program models and past research. Thus, the study includes a literature review to identify information from previous research on the housing needs of youth aging out of foster care and the range of programmatic models in use to address those needs. The literature review has been timed to take place before survey data collection, thereby ensuring that the project will not duplicate the collection of that

information from the public if it can be obtained from existing documents or databases. The literature review has informed development of the survey. Sources include peer-reviewed journals; conference proceedings; government reports; programs that provide housing to youth who are homeless, at risk of homelessness, or transitioning out of foster care, or that could be used to serve these populations; and organizations, advocacy groups, and think tanks with applicable experience.

5. Impact on Small Businesses or Other Small Entities

The PHA and PCWA survey will collect data from local agencies that may vary in size. To minimize burden on small entities, the questionnaire will be available in a web version and respondents may access it at their convenience. Additionally, the instrument will be available in hard-copy form to those who prefer and request this mode. The expectation is that the organization staff best suited to respond to the survey will be program directors and others with administrative responsibilities. Because the survey does not request accounting or financial data that might require accessing records, it is not likely to put any undue burden on small entities. Rather, the data collection instrument will ask respondents about the community context of their programs and the use of FUP vouchers for youth aging out of foster care.

6. Consequences of Collecting the Information Less Frequently

The survey is a one-time data collection event, with no repetition of data collection planned. The proposed data collection aims to provide HUD with evidence on how FUP vouchers are being used to serve youth aging out of foster care, whether and how communities are meeting the housing needs of youth aging out of foster care, and what innovative housing models are being used to help meet those needs. If the proposed activity is not implemented, HUD will have no direct information with which to answer these questions. There are no legal obstacles to reducing the burden.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

This request fully complies with the general information collection guidelines of 5 CFR 1320.5(d)(2). No special circumstances apply.

8. Comments in Response to the Federal Register Notice/Outside Consultation

Throughout the development of the survey instruments, HUD's Office of Policy Development and Research has consulted extensively with staff in HUD's Office of Public and Indian Housing (PIH), which has responsibility for oversight of the Family Unification Program. HUD also consulted with the public about this information collection. As required by 5 CFR 1320.8(d), a 60-day notification was published in the Federal Register on January 27,

2012, Volume 77, Number 18, page 4336, FR-5609-N-02. See Appendix A for this text. No public comments were received.

9. Explanation of any Payment/Gift to Respondents

Respondents will not be offered an incentive for completing the survey.

10. Assurance of Confidentiality Provided to Respondents

Confidentiality. The information collection will fully comply with all aspects of the Privacy Act (1974). Individuals and agencies will be assured of the privacy of their replies under Section 934(c) of the Public Health Service Act of 1944, 42 USC 299c-3(c). Survey respondents will be told the purposes for which the information is collected, and that any identifiable information about them will not be used or disclosed for any other purpose, except under such circumstances as may be required by law. Respondents will be given this assurance during recruitment (in the advance letter), which will also provide assurance that the information being gathered is for research purposes only. Respondents will be informed that participation is voluntary, that they may refuse to answer any question, and that they may stop their participation at any time.

We will be requesting name, position, email, and phone number from individuals who complete the survey. This information will only be used to contact respondents should there be a need to followup on survey responses. Names will not be linked to comments or responses in data provided to HUD. Data will be reported in aggregate form in all reports. The contractor will safeguard all data, and only authorized users will have access to them. Information gathered for this study will be made available only to researchers authorized to work on the study.

Data security. The contractor has a secure server for online data collection, utilizing its existing and continuously tested web survey infrastructure. This infrastructure features the use of HTTPS (secure socket, encrypted) data communication; authentication (login and password); firewalls; and multiple layers of servers, all implemented on a mixture of platforms and systems to minimize vulnerability to security breaches.

Hosting on an HTTPS site ensures that data are transmitted using 128-bit encryption, so that transmissions intercepted by unauthorized users cannot be read as plain text. This security measure is in addition to standard password authentication that precludes unauthorized users from accessing the web application.

The contractor has established data security plans for handling all data during all phases of survey execution and data processing for the surveys it conducts. The contractor's existing plans meet the requirements of U.S. federal government agencies and are continually reviewed in the light of new government requirements and survey needs. Such security is based on (1)

exacting company policy promulgated by the highest corporate officers in consultation with systems staff and outside consultants, (2) a secure systems infrastructure that is continually monitored and evaluated with respect to security risks, and (3) secure work practices of an informed staff that take all necessary precautions when dealing with private data.

11. Justification for Sensitive Questions

HUD will not be collecting any information of a sensitive nature from individuals or organizations.

12. Estimates of Annualized Hour and Cost Burden

Table A.1 provides the maximum estimated hour burden associated with this data collection. The online survey will be fielded to all PHAs currently administering FUP. Though we expect that approximately half of these PHAs will be administering FUP vouchers to youth, because we do not know precisely how many PHAs are administering the program to this population, our burden estimates assume that all PHAs are currently administering the FUP to youth (approximately 300). Our estimated hour burden for PHA administrators is adjusted based on our assumption that 80 percent of all PHAs will agree to be surveyed (n=240). We also plan to contact all PCWAs associated with the PHAs that respond. As there is at most one partnering PCWA in each community, the total number of PCWAs will not exceed 240. Our estimated hour burden for PCWA administrators is adjusted for the expected response rate of 75 percent (see Part B. for additional information on the expected response rate). Therefore, the total respondent pool assumed in Tables A.1 is 420 respondents. The maximum total hour burden of data collection for this project is estimated to be 210 hours. All hourly burden estimates for completing the survey questionnaire are based on the assumption that the survey will take no more than 30 minutes (0.5 hours).

Table A.1. Estimated Hour Burden, by Data Collection Activity

Instrument	Type of Respondent	Number of Respondents	Number of Responses per Respondent	Average Burden (in hours) per Response	Total Hour Burden
Survey (Appendix C)	PHA Administrators	240	1	0.5 hours	120
Survey (Appendix E)	PCWA Administrators	180	1	0.5 hours	90
Total		420			210

HUD will pretest the survey instrument with a maximum of nine PHAs and nine PCWAs to evaluate its flow and identify any questions not being comprehended as intended, and verify that the survey takes no more than 30 minutes (0.5 hours) to complete.

Table A.2 provides estimates of the cost burden by data collection activity and for the project overall. The total cost burden is estimated to be \$6,827.10. HUD has estimated the average (median) hourly wage rate of each respondent type using Bureau of Labor Statistics (BLS) standards.

Table A.2. Estimated Hour Cost Burden, by Data Collection Activity

Instrument	Type of Respondent	Number of Respondents	Number of Responses per Respondent	Average Burden (in hours) per Response	Average Hourly Wage Cost ^a	Total Hour Cost Burden
Appendix C: Survey	PHA Administrators	240	1	0.5 hours	\$32.51	\$3,901.20
Appendix E: Survey	PCWA Administrators	180	1	0.5 hours	\$32.51	\$2,925.90
Total		420				\$6,827.10

^a Average hourly wage cost is from the BLS Occupational Employment Statistics from May 2010, available at <http://www.bls.gov/oes/current/oesrci.htm>. The wage rates above are median hourly wage rates for community social service occupations and the median hourly wage rates for managers of social and community services.

13. Estimates of Other Total Annual Cost Burden to Respondents or Recordkeepers/Capital Costs

There are no additional costs to the respondents.

14. Annualized Cost to Federal Government

The annual cost of the survey development, data collection, analysis, and reporting is calculated to be approximately \$375,330 over the two years of the contract.

15. Explanation for Program Changes or Adjustments

This is a new data collection.

16. Plans for Tabulation and Publication and Project Time Schedule

Time schedule. HUD anticipates beginning data collection one month after receiving OMB clearance, which is currently estimated to be in May 2012. Thus, the estimated data collection start is June 1, 2012 but data collection may begin sooner or later, depending on when HUD receives OMB clearance. Table A.3 presents the anticipated data collection schedule by type of data collection. The web-based survey will begin by first fielding the PHA sample, estimated to require about 8 weeks. The PCWA sample will be collected from PHA respondents. Thus the PCWA sample will be fielded after the field period ends for the PHA population. The PCWA survey will have the

same survey approach and field duration as the PHA survey (an additional 8 weeks).

Table A.3. Data Collection Schedule

Data Collection Activity	Start of Data Collection	Completion of Data Collection
A: Web-based survey of PHAs	June 1, 2012	July 27, 2012
B: Web-based survey of PCWAs	July 30, 2012	September 21, 2012

Analysis. The analysis of data and information will form the basis of a monograph devoted exclusively to the takeup and administration of FUP, and will provide input for a final report presenting lessons learned, opportunities for serving this population, and suggestions for future research and study.

The FUP monograph will draw on findings from the FUP surveys, and sections of the literature review pertaining to FUP. Survey data will be tabulated and presented descriptively to form a cohesive picture of the extent to which and how FUP is being used at the local level to serve the needs of youth aging out of the foster care system. The findings will be presented in the context of what is known about FUP, as documented in the literature review.

The final report will present lessons learned and opportunities for improving access to housing for youth as they transition out of the foster care system, and will identify future directions for research and evaluation efforts. Based on the study findings, the report will discuss promising models and their features, recognized challenges, and strategies for addressing these challenges in the field. It will include the rationale for recommendations, including any important qualifications or caveats with respect to diverse contexts and subpopulations. The report will also include suggestions for future research as informed by gaps in the current understanding of the housing needs of youth aging out of foster care and options for addressing them, as well as available performance and study findings highlighting those models available for rigorous evaluation. The final report will include several summaries to facilitate wider dissemination of its findings: (1) a one-paragraph abstract, (2) a two-page executive summary presenting the principal findings and report recommendations, and (3) a report summary of no more than ten pages that includes a synopsis of the research tasks, methodology, and findings.

Publication. Findings from the data collection activity and analysis will be included in a monograph and final study report. This study effort also will produce three short policy briefs to provide timely information structured around the decision making needs of policymakers and practitioners. The final report and policy briefs will be completed by July 2013.

17.Reason(s) Display of OMB Expiration Date Is Inappropriate

HUD will display the OMB number and expiration date on the web and paper versions of the PHA and PCWA survey questionnaire used for this data collection. HUD is not seeking an exception.

18.Exceptions to Certification for Paperwork Reduction Act Submissions

HUD is not seeking an exception.

REFERENCES

U.S. Department of Health and Human Services, Administration for Children and Families, Administration on Children, Youth, and Families, Children's Bureau. AFCARS report #16: Preliminary estimates for FY 2008 as of October 2009. Washington, DC, 2009.