

A. Justification

Introduction

In support of the Federal Strategic Plan to Prevent and End Homelessness, the U.S. Department of Housing and Urban Development (HUD) is sponsoring a research effort to explore and document how public housing agencies (PHAs) currently serve and interact with homeless households. The goal of this study, the *Study of Public Housing Agencies' Engagement with Homeless Households*, is to establish a baseline level of PHAs' current engagement in serving homeless households and to better understand the current opportunities provided by PHAs that either have an explicit preference for homeless households or that target assistance to homeless households in other ways. The study will also seek to explore barriers encountered by PHAs or concerns perceived by these agencies about increasing the number of homeless households served or targeting homeless households. HUD intends to use this information to identify mechanisms to address or eliminate barriers to serving homeless households in mainstream housing assistance programs, with a focus on the housing choice voucher (HCV) program and public housing. This study will be completed by Abt Associates Inc. on behalf of HUD.

In order to assess how the preferences, set-asides, and targeted programs for homeless households are implemented by PHAs, and to identify the barriers to targeting homeless households for assistance among public housing agencies that have not adopted such a strategy, the study will use a two-part data collection process. First, HUD will conduct a web-based census of all PHAs to determine the extent and type of activities that PHAs are using to serve homeless households. The census will provide information about PHAs that use preferences or other approaches to serve homeless households and about PHAs that do not make special efforts to serve homeless households.

OMB approval for the first part of the data collection, the web-based census, under OMB control number (2528-0284) was received on May 2, 2012. This Submission covers the second part of the data collection effort, the PHA follow-up survey.

This second part of the data collection will be a telephone survey to collect additional information from a purposive sample of 125 PHAs. This in-depth survey will allow HUD to gather more information on issues that could only be touched upon in the census survey, including how PHAs relate to local planning and program implementation efforts to address homelessness, why PHAs do (or do not) implement preferences for admission of homeless applicants, how programs for homeless households created by partnerships between PHAs and other organizations work, and how PHAs can address barriers that may make it difficult for homeless households to access the "mainstream" housing assistance programs administered by PHAs.

A.1 Circumstances that Make the Collection of Information Necessary

The Department of Housing and Urban Development's (HUD) *Study of Public Housing Agencies' Engagement with Homeless Households* seeks to examine the extent to which public housing agencies (PHAs) have developed and implemented preferences for homeless households. The public housing and Housing Choice Voucher (HCV) programs administered by local PHAs are critical housing resources for low-income households across the country. However, because these resources are in such high demand, there are often waiting lists that are years in length or are closed to new applications altogether. To address this shortage relative to need, some PHAs have enacted

preferences or set-asides for homeless households, who are the most vulnerable among the low-income population.

This study will:

- examine how many PHAs have adopted preferences and set-asides in their Housing Choice Voucher and public housing programs, to help homeless households access housing assistance more quickly and use it to prevent future homelessness;
- document PHA administration of other programs that serve homeless households, including HUD homeless assistance programs and allocations of resources from additional mainstream programs, such as HOME, that may be targeted to homeless households;
- explore how the preferences, set-asides, and targeted programs for homeless households are implemented; and
- identify the barriers to targeting homeless households for assistance among public housing agencies that have not adopted such a strategy.

The housing available through PHA programs such as public housing and HCV falls far short of the existing level of need in many communities. Most PHAs must place households that apply for one of their housing programs on a waiting list that may span years in length. Prior to 1998, HUD mandated that PHAs target their available public housing units or Housing Choice Vouchers to applicants with the most serious housing issues. These included households that were displaced by government action, living in severely substandard housing or homeless, and households with an unsustainable rent burden (paying more than half of their income for rent). Homeless applicants were given priority for admission because they were deemed to be living in substandard housing. However, in 1998 the federal government rescinded the mandated federal preferences and replaced them with broad PHA discretion to establish preferences based on their own local conditions and policy priorities.

PHAs currently enact a variety of preference systems. Some PHAs continue to provide preferences to homeless households within a framework similar to the former federal preferences. Others have shifted to a first-come, first-served system. Many PHAs give preference to local residents, and some give priority to veterans, to people with disabilities, to homeless people, or to other groups. PHA preference systems vary by level of complexity and explicit target populations; some work in favor of homeless households and some to their disadvantage.

Most PHAs must complete an Annual PHA Plan that describes the agency's overall mission and plan for serving low-income and very low-income families, including any local preferences for selecting applicants from their waiting lists. While HUD reviews all PHA plans to ensure that the preferences chosen by the PHA do not exceed the discretion given to them, there exists no central database of the preferences used by PHAs nationally. PHA Plans could be reviewed for information on preferences, but they are difficult to search electronically, and most of the plans do not provide a level of detail sufficient to capture the complexity of PHA preference systems or to discover whether a PHA has implemented set-asides of units for the full range of programs that could serve homeless households. In addition, there are particular PHAs that are exempt from the annual requirement. Exempt PHAs include agencies with a combined unit total of 550 or fewer and is not designated "troubled" under

the Public Housing Assessment System (PHAS) or the Section 8 Management Assessment Program (SEMAP). As of July 2012, there were 2,747 PHAs that are currently exempt from the plan requirement.

A.2 How and by Whom the Data will be Collected and Used

A.2.1 Project Overview

There are approximately 1.2 million public housing units and 2 million housing choice vouchers administered by over 4,000 PHAs nationwide. To identify the extent to which these 3.2 million housing “units” intentionally serve homeless households, HUD will conduct a census of all 4,065 PHAs. The census will provide information about PHAs that use preferences or other approaches to serve homeless households and PHAs that do not make special efforts to serve homeless households.

The follow-up interviews that are the subject of this submission will provide deeper insights into the role PHAs play (or do not play) in planning and implementing local efforts to address homelessness, how preference systems and partnerships between PHAs and other organizations work in practice, and what factors prevent agencies from establishing preferences for homeless households and overcoming barriers to the use of the Housing Choice Voucher (HCV) and public housing programs by homeless households. The two types of data collection—census of all PHAs and a follow-up survey of a subset of agencies—will yield different types of information.

This section details the approach HUD will take to conducting the follow-up interviews with selected PHAs. A purposive sample of PHAs for the follow-up survey will be selected based on responses to the initial census. During this review, the research team will identify: whether the PHAs administer Public Housing, HCV, or both; which PHAs have homelessness preferences and which do not; whether PHAs with homeless preferences have formed partnerships with homeless assistance providers; and whether PHAs without preferences operate within CoCs that have large numbers of homeless people. Using sampling strata based on these criteria, a sample of 125 PHAs will be selected.

A.2.2 Purpose of Data Collection

Since the termination of federal preferences for homeless households, great variation has developed in approaches to prioritization of access to PHA housing resources. The follow-up survey will allow for richer analysis of PHA activities related to serving homeless households and PHA contributions towards reducing and ending homelessness in the local community. The questions asked of PHA respondents will permit open-ended responses and will draw on the experience and knowledge of respondents regarding why their agencies do or do not identify homeless households as a target population. The questions asked of respondents will vary, based on their census responses regarding whether (or not) their PHAs provide preferences to homeless households. The follow-up interviews will also explore the implementation of homeless preferences for PHAs that have established such preferences.

The follow-up survey seeks to answer the following research questions:

- 1. How are preferences for homeless households defined, structured, and implemented?***

The research objective for this question is to identify the ways in which communities decided to prioritize homeless households and to provide more detailed information on their preference systems. The sub-questions for this research question relate to factors that

influence PHA decisions to establish preferences, the definition and structure of those preferences, how they are implemented, how homeless households flow to and/or through the PHA's housing programs, and the role of the PHA in a broader network of homeless services in the community.

2. *What factors did, or would, the PHA consider in establishing preferences for homeless households?* The objective of this research question is to understand the reasons why some PHAs have established preferences or set-asides for homeless households and what factors affect PHAs' decision-making about establishing such preferences, including any additional costs that might be associated with serving homeless households. Questions explore whether PHAs without preferences for homeless households ever considered implementing a preference, what factors were considered in their decision, concerns about and barriers to establishing preferences, whether administrative fee restrictions contribute to their concerns about establishing preferences, whether community partners such as the Continuum of Care have approached the PHA about coordinating their efforts in assisting homeless households or to request the implementation of a preference, and whether any incentives might encourage the PHA to implement preferences or set-asides for homeless households.

A.2.3 Who Will Use this Information

HUD, the primary beneficiary of the planned data collection, will use the information from the study to enhance its understanding of the extent to which PHAs are serving homeless households, the types of activities they are conducting to do so, and the barriers reported by PHAs that may be preventing some agencies from targeting homeless households. The follow-up survey will generate information of greater depth and nuance, to support HUD's future policy considerations. The information collected here may also be of interest to community agencies that serve homeless populations, to researchers, to local policy makers seeking to address homelessness in their communities, and to PHAs themselves.

A.2.4 Instrument Item-by-Item Justification

The follow-up survey will have pre-filled information from the same PHA's responses to the census, and many of the questions in the follow-up interview will allow the PHA respondent(s) to expand upon those prior responses.

Based on responses to the census, some questions in the follow-up survey are targeted to those PHAs sampled because they have strong general preferences for homeless households or limited preferences (set-asides of housing voucher or public housing units) and partnerships with homeless service organizations, or both. These modules will contain some closed-ended questions and also will offer an opportunity for respondents to elaborate on their agencies' policies and programs. Other modules of the survey will be addressed to agencies that do not have preferences and will explore the reasons for that decision.

The target respondents for the follow-up interviews are the executive directors and other relevant staff of the 125 sampled PHAs. The follow-up interview instrument is designed to be administered by a trained interviewer from HUD's contractor via telephone. Like the census, the follow-up survey was designed to accommodate multiple respondents from a single sampled PHA. The interviewer will ensure that the PHA being interviewed is aware of this and will include mention of multiple respondents in both the introduction script and throughout the survey. A draft of the follow-up interview instrument is included as Appendix A.

The follow-up survey instrument is organized into five modules:

1. PHA Role with the Continuum of Care;
2. PHA Preferences Systems;
3. Barriers to Using the HCV and Public Housing Programs;
4. Other Programs Administered by the PHA; and
5. Closing.

Appendix B provides an item-by-item justification for all items in each section of the follow-up interview.

A.3 Use of Improved Technologies

Improved information technology will be used in this study in two distinct ways:

1. To pre-fill some data from the PHA census to guide the follow-up interviews; and
2. To automate the qualitative information collected in a way that allows for easier analysis.

The study will generate a substantial amount of data on the universe of PHAs through the PHA census. Data from the census will be pre-filled into the follow-up survey instrument for each PHA in the follow-up sample. This will enable the interviewers to navigate through the relevant sections of the interview guide, help them avoid asking questions which are not applicable, and provide the factual basis for follow-up questions.

The use of NVivo technology will allow us to classify responses to the open-ended interview questions in a semi-structured, automated way. This will allow for easier analysis of the data by PHA size, preferences, programs operated, and types of responses given to the open-ended questions.

A.4 Efforts to Avoid Duplication

In order to avoid duplicate data collection and data entry, the study team will use responses from the PHA census data—for example, on which housing programs are administered by each PHA, which PHAs do and do not engage with homeless households, and which PHAs do and do not have relationships with the local homeless assistance community—instead of collecting this information again. This will minimize burden on the respondent.

A.5 Involvement of Small Entities

The research team may work with small community agencies that administer HCV programs. Given that a large proportion of housing agencies overall are small in size, the research team has designed the study approach with these agencies in mind, and the team will take great care to ensure minimal burden of all PHAs—particularly those small in size—participating in this study. However, because of the sampling criteria that will be used to select PHAs for the follow-up survey, the research team expects that very few sampled PHAs will be small in size.

A.6 Consequences of Less Frequent Data Collection

The follow-up telephone survey will be conducted a single time only.

A.7 Special Circumstances

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320.6 (Controlling Paperwork Burden on the Public, General Information Collection Guidelines). There are no circumstances that require deviation from these guidelines.

A.8 Consultations Outside the Agency

In accordance with the Paperwork Reduction Act of 1995, the Department of Housing and Urban Development (HUD) published a notice in the Federal Register on May 14, 2012. The docket number is FR-5609-N-04. The Federal Register Notice appeared on pages 28400 and 2841. A copy of the Federal Register Notice is included in Appendix C. No public comments were received by HUD in response to the 60-day Federal Register Notice.

The instrument was reviewed by staff from several departments within HUD and one other federal agency. The specific offices within HUD included the Offices of: Public and Indian Housing (Housing Choice Voucher and Public Housing Operations); Community Planning and Development (SNAPS – Office of Special Needs Assistance Programs); and Policy Development & Research. HUD also sought feedback from the U.S. Interagency Council on Homelessness. In addition, HUD reached out to, and received comments on the instruments from several industry organizations, including the National Association of Housing and Redevelopment Officials (NAHRO), Council of Large Public Housing Agencies (CLPHA) Public Housing Authorities Directors Association (PHADA) and the National Alliance to End Homelessness (NAEH).

A.9 Payment to Respondents

The respondents to the PHA follow-up interviews will not receive payments for completing the survey, because the response burden is minimal and the respondents are agency staff.

A.10 Arrangement and Assurances Regarding Confidentiality

The confidentiality procedures followed for this evaluation will be appropriate to the nature of the respondents and the type of information sought. PHAs will be told that the information requested under this collection will be used for research purposes only and will not be used for compliance monitoring.

Prior to the start of the PHA follow-up interview, the study protocols will be reviewed by Abt Associates' Institutional Review Board (IRB). Detailed plans for data security procedures are described below.

A.10.1 Data Confidentiality Protections

The follow-up interview will be collected by telephone with a junior interviewer entering data directly into a computer. The information will be analyzed using NVivo technology. All data will be stored on the HUD contractor's secure data servers. Every precaution appropriate to the type of information collected for this study will be taken to ensure that the data remain both secure and confidential.

A.11 Sensitive Questions

The follow-up interview of Public Housing Agencies does not include any questions of a sensitive nature.

A.12 Estimate of Annualized Burden of Hours

This information collection will gather data from a sample of PHAs, as described in Section A.2.1 above. The 125 PHAs in the sample will be invited to participate, and respondent tracking will be conducted to maximize their response. The sample will include more than 125 PHAs so that if a PHA opts not to participate, another PHA will be selected for a full sample of 125.

Exhibit A.12.1 shows the respondent burden for the follow-up telephone survey. Sampled PHAs declining to participate will be replaced by others, so the total expected burden is 125 x 1 hour = 125 hours.

Exhibit A.12.1 Burden of Hours (Follow-up Telephone Survey)

Respondents	Projected Response	Number of Entities	Responses per Entity	Average Time to Complete in Minutes	Burden (hours)
Burden, assuming all sampled PHAs respond or are replaced by other PHAs	100%	125	1	60 min.	125

A.13 Estimated Record Keeping and Reporting Cost Burden on Respondents

This data collection effort involves no record keeping or reporting costs for respondents, other than the time burden to respond to questions on the data collection instrument as described in item A.12 above. There is no known cost burden to the respondents.

A.14 Estimated Cost to Federal Government

The total contract amount for this data collection effort is **\$251,078**.

A.15 Reasons for Changes in Burden

This submission to OMB is a request for approval for the second part of the research already approved under OMB control number (2528-0284); there is no change in the original burden estimate for the first phase of the study.

A.16 Tabulation Plan, Statistical Analysis and Study Schedule

A.16.1 Tabulation Plan and Statistical Analysis

This information collection request is for a follow-up survey of 125 sampled PHAs. Data will be collected through a telephone interview of Executive Directors or other PHA staff from a purposive sample of 125 PHAs. The specific use of the data collected through this PHA follow-up interview is described below.

The analysis of the responses to the follow-up survey will focus on the following topics:

- Why some PHAs with service areas that include large numbers of homeless people participate actively in efforts to end homelessness, while others do not.
- Possible incentives for encouraging PHAs to engage, or increase their engagement, with homeless households.
- Models for using Housing Choice Vouchers, project-based vouchers, and public housing to serve homeless people, including the nature of PHA partnerships with other organizations within the community.
- The mechanics of implementing preferences for homeless households.
- Barriers homeless households may encounter in using the HCV and Public Housing programs and how they can be overcome.
- Evolving definitions of homelessness and how they affect PHAs.
- Ways to encourage PHAs to report data to the Continuum of Care's Homelessness Management Information System (HMIS).

Programming the Survey in NVivo. Responses to the follow-up survey will be recorded directly into the survey instrument at the time of the interview, capturing the answers in response to open-ended questions as close to verbatim as possible. Two researchers will review the completed survey forms as soon as possible after the interview and discuss and agree on corrections. Once final, the responses will be coded and processed using NVivo software.

Using the typed interview responses (entered during the interview on the survey form in Microsoft Word), the research team will organize and analyze responses using the qualitative research software package NVivo. NVivo is particularly useful for analyzing a large number of interviews, because it allows us to generate reports that group both close-ended and narrative responses to individual study questions and to combinations of questions across all of the interviews. Using NVivo, the research team will create codes for questions, themes, or "attributes," so they can be sorted quickly across all the interviews and then synthesized by the research team. For example, analysis codes may be created for any of the questions in the interview protocol, as well as for specific topics that the research team wants to analyze across the responses to different survey questions. Analysis codes that cut across survey questions might include:

- Partnership advantages
- Eligibility screening
- PHA staff burden
- Homeless subpopulations
- HUD program rules
- Use of MTW authority
- Differences among programs—design, rules, objectives
- Competing needs of other (not homeless) households

The research team will also use the findings of the earlier PHA census to create within NVivo various categories of PHAs or PHA characteristics, which can then be linked to the responses to the follow-up telephone survey to better understand the context for the responses.

Analyzing the Follow-Up Survey Results. Creating the analysis codes will be an iterative process. The team will begin by creating codes based on broad categories of research questions the survey is intended to answer and implementing that coding in the NVivo software. After members of the team have implemented the coding and begun to pull information from NVivo to answer the research questions, the team will meet to discuss what they are finding and to identify additional codes and sub-codes that may be useful for identifying patterns of PHA responses. This additional coding will then be implemented, and the analysis will proceed, possibly followed by a further round of discussion and additional coding of the data.

Because the PHAs included in the follow-up telephone survey will be purposively selected, the results of the analysis will be primarily narrative discussion of insights and examples. However, the team will include some quantitative findings as well, in order to give a sense of how frequently certain types of responses were given. The results of the analysis will also attempt to show the logic and interdependencies among PHA characteristics, their preference policies, and their concerns about engaging with homeless households.

A.16.2 Study Schedule

Under the current schedule, the PHA follow-up telephone survey will begin in November 2012 and will span a 14-week period. Commencement of the follow-up survey will follow the completion of the PHA census, preliminary analysis of the census data, selection of sampled PHAs, and pre-filling of information from the census into the survey instrument used for each sampled PHA. A Final Report will be developed and submitted in early June 2013. The Final Report, and all other publications resulting from this research effort, will clearly note that the findings from the telephone survey are based on a purposive sample of 125 public housing agencies, and therefore, the results cannot be generalized to a broader population. Findings from the telephone survey are intended to be descriptive and illustrative in nature.

A.17 Expiration Date Display Exemption

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

A.18 Exceptions to Certification

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