

B. Collections of Information Employing Statistical Methods

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

The Office of Housing Counseling currently has 403 agencies that provide HECM counseling. Over the last 12 month period (April 1, 2012 to April 30, 2013) approximately 102,048 counseling sessions were conducted by these agencies. HUD would review between 30 to 40 percent of the 403 agencies in any given review cycle. Current handbook requirements state agencies must be reviewed at least every 2 years. High performing agencies can be extended to 3 years review cycles. As we noted in previous submissions, approximately 14 to 16 client files are selected for initial review and HECM client surveys are sent out to those selected clients. If initial reviews of the selected client files reveal concerns, additional files are selected in order to determine if the finding were an isolated issue, or indicative of a trend. Of the 14 to 16 HECM client surveys sent out by HUD, previous experience has shown that we receive responses from approximately 10 to 15 percent, which results in 1 to 3 responses. The surveys are specific to the respective counseling agency and are not compared to other agencies results. They are not used as a statistical sampling tool within the "universe" of HECM clients and are meant to be a way of receiving client feedback on a specific agency only.

The labeling of this form as a "survey" does not accurately describe its intended use. The use of this form is more in line with that of a "client's evaluation and feedback" of the specific agency in which they received services. Any negative comments within the form will be considered and evaluated in context to the agencies overall performance.

2. Describe the procedures for the collection of information.

In advance of a scheduled review the agency will provide HUD with a list of files typically by assigned file number for a given period of time. This is typically within the last year and at least 3 months before the expiration of their current HUD approval. The reviewer then selects 14 to 16 files, and request the name and address of those files from the agency. HECM client surveys are sent out and HUD includes a stamped self-addressed return envelope to encourage a response. Returned survey forms are then reviewed to determine if there are any negative comments and how they may factor into the final review of the agency. HUD has discretion, within HUD Handbook 7610.1 REV-5, to review any amount of additional files necessary and send out subsequent surveys, if the initial review sees a trend in non-compliance with HUD requirements. In such situations, it may be important to collect additional input from agency clients via the survey, to determine and confirm an appropriate corrective response.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections

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based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

The HUD reviewer, at his discretion, may also contact the clients directly via telephone for any relevant follow-up questions or clarifications when surveys are returned. In situation where no surveys are returned, the reviewer can make follow-up telephone calls, if preliminary results of the agency review indicate potential problems regarding program compliance. As previously stated, the client responses to the survey are specific to the agency and are not reviewed against responses from other agencies. Again, the survey is not intended to be reviewed against the universe of other agency surveys.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of test may be submitted for approval separately or in combination with the main collection of information.

There is no testing in the use of this survey. Its sole purpose is to determine the client's perspective on their interaction with the agency from the beginning of HECM counseling process to its conclusion. HUD requirements and policy require the client to contact with the agency and have an initial intake session. The intake session would cover all the required information needed for the counselor to prepare for the counseling session. A counseling appointment would be set up at that time. The agency would then send the client a package of required information which must be available to the client for a thorough review prior to the actual counseling session. The counseling session would be conducted with all the appropriate parties and at the conclusion a HECM counseling certificate, HUD form 92902 would be issued. Counseling agency are required to make a reasonable effort to follow-up with client at within 60 days, and then issue a closeout letter with 30 days of that date.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

Any clients survey responses are sent to the specific HUD reviewer identified in the cover letter. For example, if the review was conducted by John Smith of the Office of Housing Counseling currently stationed in the Atlanta HUD office, the survey would be returned directly to that individual and office. This will vary from reviewer to reviewer depending on what specific HUD office they work out of. The Office of Housing Counseling is a "virtual office" with 67 staff members in over 30 office's nationwide. All of these staff may be assigned agency reviews.