

## B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

### 1. Respondent universe and sampling methods

Provide a numerical estimate of the potential respondent universe and describe any sampling or other respondent selection method to be used. Data on the number of entities (e.g., households or persons) in the universe and the corresponding sample are to be provided in tabular format for the universe as a whole and for each stratum. Indicate expected response rates. If this has been conducted previously include actual response rates achieved.

The universe includes all assisted housing projects and households located in the continental United States, Alaska, Hawaii, and Puerto Rico. The following housing programs will be included in the sample:

Public Housing (including Moving to Work [MTW])

PHA-administered Section 8 (Vouchers and Moderate Rehabilitation, including MTW)

Owner-administered Section 8, Section 202 Project Rental Assistance Contract (PRAC), Section 811 PRAC, Section 202/162 Project Assistance Contract (PAC)

The QC Study sample will be designed to obtain a 95% likelihood that estimated aggregate national rent errors for all programs are within 2 percentage points of the true population rent calculation error, assuming an error of 10% of the total rents (based on the statement of work [SOW]). Table B1.1 presents an example from the FY 2012 QC Study sample—the number of projects and units by HUD region, their expected number of PSUs, and the number actually sampled. For the FY 2012 study, 59 distinct PSUs were selected. One PSU had expectations greater than 1.0, and was selected twice.

**Table B1.1. Number of Projects and Units in Sampling Frame by HUD Region for FY 2012**

HUD Region	PIH-Admin Sec 8	Public Housing	Owner-Administered	Total	PIH-Admin Sec 8	Public Housing	Owner-Administered	Total	Expected PSU Sample	Actual PSU Sample
<b>US</b>	<b>13,922</b>	<b>7,204</b>	<b>19,944</b>	<b>41,070</b>	<b>2,195,755</b>	<b>1,077,747</b>	<b>1,362,775</b>	<b>4,636,277</b>	<b>60.0</b>	<b>60</b>
1	1,065	481	1,791	3,337	150,152	67,804	122,575	340,531	4.42	4
2	1,673	616	1,671	3,960	293,947	242,101	163,205	699,253	9.57	10
3	1,203	781	1,961	3,945	192,594	110,019	152,636	455,249	6.04	6
4	2,592	1,975	3,695	8,262	381,777	274,734	242,442	898,953	12.13	12
5	2,102	1,183	4,251	7,536	324,379	158,065	302,274	784,718	10.32	11
6	1,676	988	1,763	4,427	253,925	102,254	111,445	467,624	5.85	5
7	658	473	1,198	2,329	83,443	35,880	61,423	180,746	2.33	2
8	508	160	850	1,518	63,476	15,705	38,475	117,656	1.43	2
9	1,873	321	1,899	4,093	355,779	49,723	132,554	538,056	6.11	6
10	572	226	865	1,663	96,283	21,462	35,746	153,491	1.8	2

In previous studies, the household sample size of 2,400 has shown to be an acceptable precision for estimates of the total average error. Table B1.2 shows the expected number of sampled projects and households by housing program type for the FY 2013 study.

**Table B1.2. Number of Sampled Projects and Tenants by Program Type for FY 2013**

Program Type	Number of Projects	Number of Tenants
Public Housing	200	800
PHA-Administered Section 8	200	800
Owner-Administered	200	800
<b>Total</b>	<b>600</b>	<b>2400</b>

### Response Rates

Three types of non-response may effect this data collection: that by PHAs/owners, tenants and third-party entities.

#### PHAs/owners

##### *Project-Specific Information*

Participation by selected PHAs/owners is mandatory such that their contracts with HUD require their participation in studies of this type. In the FY 2012 study all PHAs/owners completed the Project-Specific Information Form resulting in a 100 percent response rate. We anticipate a similar response rate for the upcoming studies.

##### *Project Staff Questionnaire*

Participation by selected PHAs/owners is mandatory such that their contracts with HUD require their participation in studies of this type. For the FY 2012 study, 548 of the 554 PHAs/owners completed the Project Staff Questionnaire resulting in a 99 percent response rate.

#### Tenants

Participation by selected tenants is mandatory; refusal to participate could result in their termination of assistance. In the FY 2012 study, 246 tenants were non-responsive out of 2,404 total tenants, resulting in a 90 percent tenant response rate.

The most common reason for tenant non-response was that they moved out before ICF Macro abstracted data from the household file. Other common reasons for replacement included: 1) the tenant refused to participate in the study, 2) legal eviction proceedings were occurring for the tenants, and 3) the tenants were away for extended periods and could not be contacted for an interview during the four month data collection window. Field interviewers are required to make at least four in-person contacts with the tenant to conduct interviews with individuals who try to evade the interview. For the FY 2013 study a similar tenant non-response rate is anticipated. Study time limits and budget constraints do not allow us to further pursue tenants who evade, refuse or are away during the data collection period.

## Third-Party Entities

Third-party entities are not required to complete our request for verification information. In the FY 2012 data collection cycle ICF Macro obtained 2,247 forms out of 2,807 requested for an 80 percent response rate. We anticipate a similar response rate for the FY 2013 study.

### **2. Procedures for collection of information**

*Describe the procedures for the collection of information, including: Statistical methodology for stratification and sample selection; the estimation procedure; the degree of accuracy needed for the purpose in the proposed justification; any unusual problems requiring specialized sampling procedures; and any use of periodic (less frequent than annual) data collection cycles to reduce burden.*

### **Basic Cluster Design**

Two levels of clustering will be used in this study:

Projects clustered within PSUs, which are generally groups of counties

Households clustered within projects

A sample of 60 PSUs will be designed, with 10 projects per PSU and four households per project (allowing PSUs and projects to be selected more than once if sufficiently large). The design calls for equal allocation of the three HUD programs: 200 Public Housing, 200 PIH-administered Section 8, and 200 Owner-administered projects. Early study samples were designed to yield the expectation of the same number of households for each program type, but for the last several years the design was modified so it would select exactly the same number of households per program. One additional project has been added to Public Housing to ensure contractual compliance in the event that something prevents data from one project to be properly collected or processed.

### **Definition, Allocation, and Sampling of Clusters**

#### ***Source Files Used for Sample Selection***

The source files for the FY 2013 study are currently being reviewed. Based on previous experience with the types and numbers of files typically provided in past years, we expect to receive similar information.

**OWNER-ADMINISTERED PROJECTS.** HUD provided one file of information on Owner-administered projects. One file had a record for each property, including the address. Certain types of contracts were excluded from the files because the rent calculation rules used for these contracts are outside the scope of this study; these include SUPP, RAP, and service coordinator contracts.

**VOUCHER AND MODERATE REHABILITATION PROJECTS.** HUD provided two files that contained information on Voucher and Moderate Rehabilitation Project households. One file contained household-level information, including county geographic information. The second file contained PHA-level information. Out-of-State households (households with transport

vouchers who used them in another state) will be eliminated from the frame. At HUD's request, starting in FY 2012, all MTW PHAs will be included in the frame.

**PUBLIC HOUSING PROJECTS.** One Public Housing Project file was provided by HUD, and included geographic information for all but a few projects. At HUD's request, all MTW PHAs will be included in the frame. The inclusion of MTW PHAs, which began in FY 2012 is a change from previous studies, where MTW PHAs were excluded. As needed, we will use the county of the PHA or the county from a previous year's file to classify these Public Housing projects into counties. Starting in FY 2012, we used the number of occupied units instead of the number of assisted units as the measure of size for a project. This has greatly reduced the number of frame issues that arise in the field due to project renovations and demolitions.

Across all program types, projects covering fewer than 10 units will be excluded. This exclusion will take place to avoid unreasonable burden on especially small projects, and to increase the efficiency of the data collection by decreasing travel to numerous small projects to collect the 2,400 cases. This change was implemented starting with the FY 2011 study. In previous years, the number 14 was used. The number 14 was chosen at a time when 7 households were selected per project to ensure there would be a sufficient number of replacements per project. However, since only four households are needed from each project, a minimum of 10 households should prove sufficient, while slightly improving the frame. In addition, any projects that are located in Guam, the Northern Mariana Islands, and the Virgin Islands will be removed from the frame because of their relatively small size and logistic issues. In Alaska there is only one PHA for Public Housing and PIH-administered Section 8 projects, which is MTW. In previous years, because the PHA was out-of-scope as a MTW PHA and the remaining Owner-administered projects were small and fairly dispersed, Alaska was removed from the frame. With the inclusion of MTW PHAs, Alaska will be included in the frame. Once the above files are processed, it will be possible to estimate the number of households in each program in each county.

### *Sample Cluster Size*

The clustering procedure will use counties as the initial cluster. Clusters will be restricted to those with a minimum number of households and projects. In the FY 2012 study, the requirements were 40 projects and 1,500 households, and at least 2 PHA/county combinations. These numbers vary slightly from year to year, depending on the degree of clustering found in the data files provided by HUD. For these purposes, vouchers will be counted as 1 project for the first 300 households and as an additional project for every 200 households above that (e.g., 500 households would count as 2 voucher projects, but 501 would count as 3). When a county does not meet the criterion, we will identify the nearest county in the same state and merge the two. A total of 370 clusters were created for the FY 2012 study, 371 for the FY 2011 study, and 340 for the FY 2010 study.

The clustering program has been highly effective in previous years' efforts, except that occasionally the resulting PSUs have been unnecessarily large. This has been resolved in the past by a manual revision of PSUs after selection. We will use the new files to create PSUs, and will examine the resulting PSUs to determine whether it is desirable to modify the resulting parameters.

We will select PSUs with probabilities proportional to size (PPS), a standard approach followed in most national surveys. However, the study calls for an equal number of households to be selected from each of the three major program types. To accomplish this, we will select PSUs with a size measure calculated as the average of the proportions of households from each of the three programs found in the PSU. The number of households in each program within a PSU will be divided by the number of households nationwide. The three values will be averaged to create a measure of size that sums to one.

The size measure will then be multiplied by 60—the number of PSUs to be selected—to obtain the expectation of selection for each PSU. If this expectation is less than one, it will be interpreted as the probability of selection of the PSU. If it is greater than one, the PSU will be selected with certainty. The integer part of the expectation will indicate the minimum number of times the PSU can be selected, and the fractional part will indicate the probability that the PSU will be selected one additional time.

### ***Sample Cluster Selection***

The PSUs will be grouped within states and then within HUD-defined regions. Table B2.1 illustrates the classification of states, the District of Columbia, and Puerto Rico to HUD regions.

**Table B2.1. Allocation of States to HUD Regions**

HUD Region	States
1	CT, MA, ME, NH, RI, VT
2	NJ, NY
3	Washington DC, DE, MD, PA, VA, WV
4	AL, FL, GA, KY, MS, NC, Puerto Rico, SC, TN
5	IL, IN, MI, MN, OH, WI
6	AR, LA, NM, OK, TX
7	IA, KS, MO, NE
8	CO, MT, ND, SD, UT, WY
9	AZ, CA, HI, NV
10	AK, ID, OR, WA

States will be sorted in a random order within regions, and PSUs will be randomly sorted within states. As the frame is prepared for the selection of PSUs, PSUs will be arranged in order, and each assigned an expectation value. A random number will be generated as a starting point to select the PSUs. A cumulative distribution of the expectations will be calculated by adding the expectation of a PSU to the cumulative expectation of the previous one (starting with the random number). Thus, the real numbers between 0 and 60 will be divided into segments, where each PSU is represented by the segment between the cumulative expectation of the previous PSU (or 0 for the first PSU) and its cumulative expectation. A random number (x) between 0 and 1 will be selected, and the integers from 0 to 59 will be added to the random number. The numbers x, 1 + x, 2 + x, and so on until 59 + x will define the selected PSUs. A PSU will be selected as many times as one of these numbers falls into its corresponding segment.

This is essentially the Goodman-Kish approach (1950), but using sampling with minimal replacement (Chromy, 1979). This procedure results in sample sizes roughly proportional to the number of households in each region, but counting households in the smaller program types more than those in the larger program types. Rather than allocate a number of clusters to each region, this method implicitly stratifies the sample and essentially allows a fractional allocation. In other words, if the expectation for a region should be 4.6 PSUs, it would have a 40% chance of getting 4 and a 60% chance of getting 5.

In addition, once the PSUs are selected, the larger PSUs will be divided and one of the parts will be selected with PPS. The decision whether or not to divide will be implemented subjectively, using a map to determine data collection burden. Once a division is made, one of the parts will be selected with PPS using the same combined size measure used in selecting the PSUs.

### ***Allocation and Sampling of Projects***

Over the last few years of quality control studies, different methodologies have been used in the allocation and sampling of PHAs/projects. These methodologies have been employed to identify an approach that continues to improve the evenness of probabilities of selection. As has been done since the FY 2006 study, projects will be allocated to program types within PSU to ensure the following conditions:

The number of projects per PSU will be 10 times the number of times the PSU was selected.

The number of projects per program type will be 200 nationwide (counting a project selected multiple times by the number of times it is selected).

The number of projects to be selected in a PSU by program type will be approximately proportional to the ratio of the number of households in that program type in the PSU, and to the number of households in that program type in all the selected PSUs.

The third condition will require rounding, and an iterative process will be necessary to achieve allocations that yield integers for all program-type cluster combinations.

For each program type, 200 projects will be selected nationwide. Although nationally the Voucher program has significantly more units than the Public Housing or Owner-administered programs, because each program type is sufficiently large on its own, each subdomain approximates an infinite population, and the sample size does not need to increase to achieve a 95% confidence interval. In addition, the approach of selecting the same number of projects per program type allows more precise estimates at the individual program-level type, along with national estimates. While this approach does result in slightly less optimal total national estimates, the estimates are expected to be within the 95% confidence interval.

These will be selected by first allocating a fractional number of projects to each sampling cell (program type/PSU combination), and then using controlled rounding to make the rows add up to 10 projects per PSU and the columns to 200 projects per program. After obtaining the allocations for FY 2013, a sample of projects will be selected from each sampling cell, with probabilities proportional to the number of households. As in previous years, our methodology will allow PHA-administered Section 8 projects to be selected more than once, but Public Housing and Owner-administered projects will be selected only once. The same PPS systematic approach

used to select PSUs will be used to select projects. Projects will be sorted by program type, county, and PHA prior to selection to ensure diversity.

## **Selection of Households**

The initial household sample is designed to be self-weighting by program. The term *self-weighting* refers to a sample where all households being sampled have the same weight, assuming that the frame is accurate and 100% response is achieved. However, differences between the number of occupied units found in a project and the number of units listed in the frame, along with the fact that the contract requires that the major housing programs be represented in approximately equal numbers, may lead to some deviations from a self-weighting sample by program; thus, the household sample will be *approximately* self-weighting. To compensate for this issue, we will make individual decisions by project once the project is sampled and its real size determined.

Consider the initial theory behind the sample. Let  $f$  be the fixed sampling rate desired for all households in the Nation. Let  $p_j$  be the overall probability that project  $j$  with  $N_j$  households is selected. The needed number of households to be sampled ( $n_j$ ) from the project to equalize weights is given by  $n_j = fN_j/p_j$ . (We note that  $n_j$  may be greater or less than  $n$ , the desired fixed sample size.) As a practical matter, project sample size will not be permitted to vary in accordance with this formula, as this would create highly disparate interviewer workloads. It will, however, be allowed to vary if more than a two-to-one ratio between projected and actual weight is discovered.

Because the selection of households will be completed at the PHA/owner site, the sampling procedures need to accommodate a variety of possible situations related to the availability of household lists and information. Interviewer procedures will provide instruction on how to select the sample, and ICF headquarters staff will be available to provide sampling assistance to the field interviewers by telephone. Because the selection of households will be done mostly onsite by the field interviewers, procedures will accommodate a wide variety of possible situations and will be simple to implement. A number of replacement households equal to the number of households selected will also be sampled simultaneously. If a household is unavailable for an interview, it will be replaced. However, some Public Housing households are flat rent cases. Since flat rent cases do not need to be interviewed, they are never unavailable, and thus will not be selected as replacements for unavailable households.

The optimal number of households per project is based on a cost ratio of two additional households for each additional project, PSU intraclass correlation ( $\delta$ ), project cost ( $C$ ), and household cost ( $c$ ):

$$\text{opt. } n = [(C(1-\delta))/(c\delta)]^{1/2}$$

References for this formula can be obtained in Hanson, Hurwitz, and Madow (1953), formula 16.2. We estimate that adding a project would result in a cost comparable to adding two households. In the FY 2003 study, we applied this formula and determined that a sample size of 2.74 households per project would be optimal. We chose four households per project in order to preserve an acceptable measure of intra-project variance and to take advantage of the fact that errors have a slight tendency to be concentrated in projects. In fact, we found in the FY 2007

study that the projects accounted for almost 6% of the variance in gross error, and this was statistically significant ( $p < .001$ ). We have used the same basic design since the FY 2003 study, with minor modifications.

The optimal number of projects and households per cluster is a function of logistics. The same two-to-one ratio that was applied to calculate the optimal number of households per project can be used to define cost units. A cost unit is the cost of including a household in the survey. Cost units are a function of the data collector's time and other factors. Ten projects and 4 households per project in a PSU produce 60 cost units ( $2 \times 10 + 1 \times 10 \times 4 = 60$ ). A design with 6 projects and 8 households per project would also have 60 cost units ( $2 \times 6 + 1 \times 6 \times 8 = 60$ ). Experience has shown that greater than 60 cost units result in an impractical amount of work for one data collector to handle. We believe that 60 cost units provide the best balance between logistical requirements and design effect. Given these issues, we decided to sample 4 households per project, 10 projects per cluster, and 60 clusters, for a total of 2,400 households.

## **Weighting**

The procedure to determine the final weights involves several steps, including calculating the project weight ( $w_1$ ); calculating the household weight ( $w_3$ ); accounting for ineligible households ( $f_e$ ); accounting for nonresponding households ( $f_n$ ); poststratifying ( $f_p$ ); and, finally, trimming the weights.

### ***Calculating the Project Weight ( $w_1$ )***

The first step to determine the final weights is calculating the project weight by compiling the sampling probabilities calculated during the cluster and project sampling and the initial data collection process. These probabilities will then be used to calculate each project's probability of selection. The probability of selection of a project will be the product of the following:

- 1) The probability of selection of the cluster ( $p_1$ )
- 2) The probability of selection of the subcluster if the cluster was divided ( $p_2$ )
- 3) The probability of selection of the project from its respective cluster ( $p_3$ )

Each cluster will be sampled with probabilities proportional to size. The measure of size to be used is the number of households adjusted to obtain equal expectation for the three major types of programs in the study. The number of households of each program in a cluster will be multiplied by an inflation factor to make all three numbers equal. The probability of selection of the cluster ( $p_1$ ) will be calculated in three steps. First, the proportion of the households in each of the three programs in a particular cluster will be obtained. Next, these proportions will be defined as the number of households in each program within a cluster, divided by the number nationwide (program's population count). Finally, the three proportions in each cluster will be averaged and multiplied by 60, the number of clusters to be selected nationwide.



In some instances, clusters may be geographically too large to collect data in a cost-effective manner. To accommodate this logistical problem, clusters may be divided into two or more subclusters or smaller geographic areas. A subcluster will then be sampled from the group of subclusters using probabilities proportional to size. This will result in the same probability that would have ensued if the division had taken place before drawing the sample, or the probability of selection of the subcluster ( $p_2$ ). If the cluster is not divided into smaller clusters, then the subcluster probability of selection will be one. The formula to calculate the project weight follows:

$$\left( w_1 = \frac{1}{\text{minimum}[p_1, 1] \times \text{minimum}[p_2, 1] \times \text{minimum}[p_3, 1]} \right)$$

Clusters with probabilities greater than one may be selected more than once (sampling with minimal replacement). These clusters are certainty clusters, in that their selection into the sample is guaranteed. For the purposes of calculating the project weight, the certainty clusters' probability of selection will be set to one.

The probability of selection of a project from its respective cluster ( $p_3$ ) will be calculated in two steps. First, the number of households in a program type within a project will be divided by the total number of households in a program type within the project's cluster. This proportion will then be multiplied by the number of projects in a program type to be selected from the cluster.

The PHA-administered Section 8 projects may have a probability greater than one for sampling purposes (meaning they could be sampled more than once). However, for the other two major program types, if the calculated probability exceeds one, it will be set to one and all the other probabilities will be readjusted so that they added to the allocation for the program in the cluster. For weighting purposes, probabilities greater than one among PHA-administered Section 8 projects will be set to one.

### ***Calculating the Household Weight ( $w_3$ )***

The second step to determine the final weights will be to calculate the household weight. To do this, the number of households in the project ( $N_p$ ) and the number of households sampled from the project ( $n_p$ ) will be identified. The household probability of selection within the sampled project is the number of sampled households divided by the number of households in the project ( $p_4$ ).

$$\left( p_4 = \left( \frac{n_p}{N_p} \right) \right)$$

The household within project weight ( $w_2$ ) is the inverse of the probability of selecting the household within the sampled project:

$$\left( w_2 = \frac{1}{p_4} \right)$$

The household base weight ( $w_3$ ) is the product of the project weight and the household within project weight:

$$(w_3 = w_1 \times w_2)$$

***Account for Ineligible Households ( $f_e$ )***

The third step in the weighting process will be to account for ineligible households within the sampled project. To do this, the number of eligible sampled households ( $n_{pe}$ ) out of all the households sampled will be needed. Then the ratio of eligible households over sampled households, or the eligibility factor, will be calculated ( $f_e$ ):

$$f_e = \frac{n_{pe}}{n_p}$$

The eligibility-adjusted household weight ( $w_4$ ) is the household base weight multiplied by the eligibility factor:

$$(w_4 = w_3 \times f_e)$$

***Account for Nonresponding Households ( $f_n$ )***

The fourth step in the weighting process is to account for nonresponding households within the sampled project. To do this, the number of eligible households, the number of responding households ( $n_{pr}$ ), and the eligibility adjusted household weight will be needed. The sum of the eligibility adjusted household weights for all eligible households in the project and the sum of eligibility adjusted household weights for only the responding households in a project will then be calculated. A nonresponse adjustment factor ( $f_n$ ) will be calculated:

$$f_n = \frac{\sum_{n_{pe}} w_4}{\sum_{n_{pr}} w_4}$$

The nonresponse, adjusted household weight ( $w_5$ ) will be the eligibility-adjusted household weight multiplied by the nonresponse adjustment factor:

$$(w_5 = w_4 \times f_n)$$

***Poststratification ( $f_p$ )***

The fifth step in the weighting process is poststratification. The sample was designed to obtain similar numbers of households in each of the following three program types:

- a) Public Housing projects

- b) PHA-administered Section 8 projects
- c) Owner-administered projects

Population totals for each of the programs will be obtained from HUD. If HUD does not provide population totals, the FY 2013 sampling frame population totals will be used. However, the sampling frame totals may not correspond exactly to these population totals and may require adjustments. The weights will then be adjusted to sum to the known external population totals, so the sum of the weights will be the same even if a different sample had been selected. In the past, this was due partially to special circumstances. Examples of special circumstances that have occurred in the past include the exclusion of geographic areas affected by the 2005 hurricanes and the exclusion of Owner-administered projects in Alaska from the frame, which were both included during the weighting process. Alaska will be included in the frame in FY 2013, but may not be selected.

To poststratify the weights, the nonresponse adjusted household weights within program type will be summed to estimate the population totals from the HUD sample. For example, the sum of weights for all Owner-administered households in the sample is an estimate of the total number of Owner-administered households in the Nation. A poststratification factor ( $f_p$ ) will be calculated by dividing the known external population totals ( $N_{program\ type}$ ) by the estimated population totals from the HUD sample ( $\sum_{program\ type} W_5$ ):

$$f_p = \frac{N_{program\ type}}{\sum_{program\ type} W_5}$$

A poststratification factor will be calculated for each program type. This factor will then be multiplied to the household weight within each program type, ensuring the sum of the household weights by program type is the same as the external population totals.

### ***Trimming the Weights***

The final step is to trim of the weights. Weights more than three times the median weight will be set to three times the median weight, and all the weights will be readjusted. Large weights usually result from incorrect frame information.

### ***Variance Estimation***

Standard errors will be obtained for a number of estimates using a delete-a-group Jackknife procedure. This will be implemented using 20 replicate groups and creating 20 sets of replicate weights. This procedure is available starting with SAS 9.2 and is considered more robust with respect to design characteristics than the Taylor series method (Kott, 1998).

### ***3. Maximization of response rates***

*Describe methods used to maximize the response rate 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 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.*

Three types of non-response may effect this data collection: that by PHAs/owners, tenants and third-party entities.

#### PHAs/owners

Participation by selected PHAs/owners is mandatory such that their contracts with HUD require their participation in studies of this type. In an effort to ensure PHA/owner participation, an initial study notification email is sent to them to inform them that have been selected for the study. This e-mail is shortly followed by another e-mail asking for their responses to the Project Specific Information Survey. PHAs/owners are given a date by which the information is needed and if that time elapses, follow-up emails and telephone calls are made to obtain the needed information. If further follow-up is required, a list of the non-responsive PHAs/owners are provided to HUD and contacted by them as well. Appendix C contains study letters that are provided to PHAs/owners at the outset of the study (i.e., Phase I).

#### Third-Party Entities

Third-party entities such as employers, financial institutions, state social service agencies, medical providers and pharmacies are not mandated to provide the requested verification. After the initial request via US mail or by the Work Number, and online employment verification system, ICF staff conduct multiple waves of follow-up using telephone and fax methods.

#### Tenants

Participation by selected tenants is mandatory; refusal to participate could result in their termination of housing assistance. Field interviewers will make at least four in-person contacts with the tenant to conduct interviews with individuals who try to evade the interview. Appendix D contains the letter that is provided to tenants regarding this study. In addition, the following letter is occasionally used to encourage tenant participation.

## Tenant Encouragement Letter

[Date]

Dear [Name],

On [Date] we provided you with a letter from the Department of Housing and Urban Development (HUD) which explained the study ICF International is conducting for HUD; it informed you that you have been randomly selected to participate in this study. Since then, our field interviewer [field interviewer name] has been attempting to get in touch with you to schedule an interview.

HUD and the Federal Office of Management and Budget (OMB) have determined that persons who receive housing assistance are **required to participate** in this study. For your information, the OMB clearance number for this study is 2528-0203. **Failure to participate is a basis for terminating your housing assistance.** Your local HUD office has been informed of, and is assisting with, this study.

It is essential that you contact us immediately to schedule an appointment for an interview. If you do not contact us by [Date], we will be forced to report your lack of cooperation to HUD. Please call the telephone number identified below to schedule your appointment with the field interviewer directly. If the field interviewer is not available, call the supervisor listed below for assistance.

*The purpose of the study is to learn more about the types of errors that occur during determinations of eligibility and tenant rents. This information will be used to meet Congressionally mandated reporting requirements related to the accuracy of rent calculations. The interview will take from 40-60 minutes. Information collected by this study will be reported as statistical summaries; however, individual information is shared with HUD headquarters and may be made available to those normally responsible for your income and rent determinations.*

If you have any general questions about the study, please call me at the toll free number listed below. If you have questions about our authorization to conduct this study, you may call Dr. Yves Djoko, the government project office, at 202-402-5851.

Thank you for your cooperation with this study.

Sincerely,

Melanie Koehn  
Data Collection Manager

Interviewer:	_____	_____
	Name	Phone Number
Supervisor:	_____	877 - 392 - 9776
	Name	Toll Free Number
Use this ID # when calling:	C/P/C	

#### **4. Tests of procedures or methods**

*Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions of 10 or more individuals.*

Previous iterations of this data collection serve as the pretests for this data collection effort. As mentioned previously, similar studies have been conducted in 2000 (data was collected for actions taken in 1999 and early 2000) and enhanced for the FY 2003 through FY 2012 studies. Before each data collection cycle, all changes or enhancements to the study are tested in an in-house procedure that evaluates the administrative and computer systems-related aspects of the study. Prepared case examples (those used in training our field interviewers) are abstracted and entered into our data collection system. Additionally, mock household interview data is entered into our data collection system and all associated administrative paperwork is created and processed. Finally, tracking reports are produced to determine that our reporting system is in place and accurate.

#### **5. Individuals consulted on statistical aspects of design**

*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.*

ICF Macro Staff—Design and Data Collection

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