

B. Collections of Information Employing Statistical Methods

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local governmental units, households, or persons) in the universe and the corresponding sample are to be provided in tabular form. The tabulation must also include expected response rates for the collection as a whole. If the collection has been conducted before, provide the actual response rate achieved.

The respondent universe is composed of projects receiving funding awards under the RIF and the RHED program. The RIF awarded exactly 51 grants in a single round of funding in 2011. We will be surveying the grantee administrators of all 51 grants and so will be interviewing the entire universe of respondents.

The RHED program was in existence from 1999 to 2009 and, according to administrative data provided by HUD, awarded a total of 948 grants during that time period. Many RHED recipients received multiple grants over the history of the program. Due to the age of the RHED program and high levels of staff turnover within rural organizations, we feared that a purely random sample of the 948 grants would produce too many grantees who were no longer in existence or the staff who had managed the grant would be unavailable. This would increase the cost of the data collection effort. Additionally, having to replace many randomly selected grantees in the sample because we could not collect information from them would eliminate the effectiveness of a random sample.

For this evaluation, we believed it would be more efficient to select a purposive sample of RHED grantees to interview. We developed the criteria listed below to assist us in selecting a purposive sample of RHED grantee organizations to interview that will give us the most insight into our research questions.

RHED Telephone Interviews: Selection Criteria

- Received a RHED grant after 2005.
- Received multiple RHED awards.
- Sample will include equal numbers of the four disadvantaged communities.
- Total number of grantees interviewed will be no less than 50 and no more than 75. Final numbers will depend on staff availability and organizational permanence.

Admittedly, these two different types of interview samples will make direct comparison difficult. However, we chose our sampling and survey procedures to compensate for a lack of consistent and reliable *administrative program data*, particularly in the RHED program.

Specific methodological concerns include:

- Assessing *respondent perception* of effectiveness.
- Time lag leading to *recall bias* on the part of some respondents.

- Sample size affecting *valid statistical comparison* across multiple-choice questions.
- *Purposive sample* affecting valid comparisons with universe of RIF grantees.

These are difficult methodological issues, but we believe that our proposed methods best address the shortcomings of the administrative program data while providing the information we need to complete the evaluation. *Obviously, any public presentation of findings will acknowledge the limitations of the study and the research methods employed.*

We address each of these concerns individually below, explain the rationale for our design, and propose some steps to address these issues in our data collection.

Content Of The Telephone Interviews – Respondent Perception

When assessing the content of the RHED interview instruments, it is important to note that this guide is not intended to be a rigidly structured survey instrument with well-validated response patterns that could be directly compared across various types of grantees. The preliminary contacts with grantees have indicated there is too much variety in the structure and history of the grantees to enable us to design a strictly structured survey instrument. Because of this limitation, we have proposed a semi-structured interview protocol that would allow respondents to indicate the unique features of their programs. We believe this qualitative interview approach will allow us to compare a considerable portion of the interview responses to data obtained from the site visits. The interview instrument will also enable us to obtain a limited amount of quantitative data (e.g., on continuity of staff).

We understand that a more valid means to obtain consistent quantitative data on grantee structure and performance would be a review of programmatic administrative data. However, as stated above, our project team has found the administrative data at both the grantee and Departmental level to be inconsistent and unreliable.

Since the RHED program was administered by the Field Offices, project staff could attempt to review data at the field office level but, even then, the data may still not be available and the investment of project resources would almost certainly not be cost-effective. Conversations with Field Office staff that we met with earlier in the evaluation indicated that older administrative records would be unavailable, and staff-turnover would have a major impact on the availability of data. These conversations also indicated that what data was available would be costly to locate, inconsistent across Field Offices, and likely to be incomplete when available.

The project team has also explored the possibility of abstracting grantee data from HUD automated systems, but the data from such systems would likely be extremely limited, open to various interpretations and variable across years.

Thus while we understand the limitations of the current interview protocol, we believe that the proposed approach would be the most useful one given the demonstrated limitations of administrative data, particularly with the RHED program. Programmatic concerns articulated in the RFP guided the approach as well.

Recall Bias

We understand that recall bias could be a severe limitation in the implementation of the proposed interviews. RHED grants were awarded as long ago as 1999. However, given the limitations of the available programmatic administrative data (i.e., serious concerns about reliability and consistency) we believe obtaining responses from representatives of the current and former grantees is the most realistic approach to gain some historical perspective on the implementation and achievements of the two grant programs and how implementation of the grants has changed since RIF replaced the RHED.

To minimize impact from recall bias, we will employ a detailed respondent validation protocol to ensure that a respondent(s) had *direct participation* in the management or implementation of one or more RIF/RHED grants. Only individuals who served directly as Executive Director or appropriate Program Director for one or more RIF and/or RHED grants will be allowed to serve as valid respondents. Moreover, such individuals will be considered valid respondents only as long as they are still affiliated with the original grantee entity. The protocol will not allow for the tracking of such individuals if they have left the employ of the entity in question. The length and type of involvement of these individuals in the management and implementation of RIF/RHED grants will be summarized in the study report.

Size of the Proposed Interview Sample

We acknowledge that the size of our proposed interview samples would limit the validity of direct comparison between the RHED & RIF grantees “samples”. However, as indicated above, that was not our major objective in implementing the interview protocol. Our primary objective in including the interviews is to make up for the limitations of available administrative data. This is why we have included several open-ended response questions in the interview instruments.

There will be problems in finalizing any interview sample. An initial review of our proposed interview sample of RHED grantees indicated that approximately 17% of the grantee entities may no longer be in existence or may have morphed into another entity. In addition, the interview protocol will proceed using the respondent validation protocol mentioned above. These factors will bias the characteristics of the achieved interview sample in yet to be determined ways. To some extent this biasing will be unavoidable, but we will clearly indicate these parameters in the study’s Final Report. We would welcome any suggestions anyone may have to address this study limitation.

Purposive Nature of the RHED Sample

We acknowledge that a purposive sample of the RHED grantees would inevitably produce some bias and would affect the validity of a comparison with data collected from the universe of RIF grantees. We originally selected this approach to address the recall bias limitations by restricting our sample to those organizations most likely to still be in existence and have maintained staff continuity. We were concerned that too much missing data from attempting to interview staff at organizations who received RHED grants as long as 15 years ago might also produce significant bias. As we mentioned above, our early examination of the recent RHED grantees indicates that approximately 17% (16/96) no longer exist. This ‘missing organizations’ issue is only likely to worsen as we attempt to interview organizations with older grants.

Conclusion

In summary we believe that our proposed approach reflects the limitations of the available data that can be obtained from current and past RIF/RHED grantees. It is not the ideal approach to address the study's research objective, but we believe it is the optimal approach given the limitations of the available data. Acknowledging the data limitations, we still believe that our approach will be useful resulting in significant findings that directly address the core research objective of the study which is to determine if the higher level of resources provided through the RIF (compared to RHED) resulted in significantly higher levels of funds leveraging and enhanced the sustainability prospects of grantee entities. The project's preliminary site visits and review of administrative data already indicate that there will be significant findings related to that research objective.

Site Visits and Constraints: Selection Criteria

Additionally, site visit locations were selected purposively, using the selection criteria below. We expect to visit 15 grantee sites and have conducted 4 *preliminary* site visits already. Contract restrictions dictate that the sample for the site visits be purposive and include half Tribal grantees. Our purpose in selecting sites to visit was to focus on organizations that received larger grants under the RIF than the RHED program. The site selection criteria are summarized below.

- Half of the site visits must be Tribal grantees.
- Recipients of larger grants will be preferred, specifically Indian Economic Development and Entrepreneurship grants and Comprehensive grants.
- When possible, extremely remote sites that will strain the travel budget will be avoided.

Data Collection Method	Sample Type	Universe of Possible Respondents	Respondents in Sample	Expected Response Rate ²²
RIF Grantee Telephone Survey	Universal Survey	51	51	100%
RHED Grantee Telephone Survey	Purposive Sample	118	50	80-100%
RIF Grantee Site Visit	Purposive Sample	51	15	100%

For clarity, we have summarized our comments on the data collection methods and the programs in the Table below.

Table 1: Methods & Programs

	RHED	RIF	Comments
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²² The expected response rate is the rate we expect to receive from the grantees included in the sample.

Administrative data	X	X	<ul style="list-style-type: none"> - Source limited to Headquarters data. - Data for RHED generally inconsistent. - RIF administrative data is more extensive but still limited.
Field visits		X	<ul style="list-style-type: none"> - Used for cohort of 15 RIF grantees. - Collection of both quantitative and qualitative data. - Will include data on previous RHED grants by these entities.
Semi-structured interviews	Utilize a validation protocol to identify respondents	Collect data for the universe of current RIF grantees.	<ul style="list-style-type: none"> - Purpose: Obtain data on program use, grant impact & organizational capacity.

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

2.1 Sample Selection Method

We are surveying all 51 RIF grantees funded from the FY2010 RIF NOFA. These projects should still be in progress and we expect no difficulty contacting and interviewing these individuals. Since all are still in progress and the number of RIF grantees is relatively small (51), we decided to interview the entire universe.

Additionally, the reason for the purposive samples for the RHED Telephone Survey and the Site Visits was explained in detail in Section 4.B, Question 1 above. To summarize, we believe that locating some of the older RHED grantees and grant administrators will be difficult. A random sample will increase the costs and we feel that missing data will render the benefits of a random sample moot in any case. We believe these factors will introduce bias in any case and that the bias introduced from utilizing a purposive sample for the RHED grantee interviews will be no worse and far less costly to execute.

For the site visits, contract restrictions require a purposive sample and it is more practical for the type of qualitative data we are hoping to collect.

2.2 Degree of Accuracy Needed

Respondents for the site visits and RIF survey are currently active grantees and required by HUD to participate in data collection efforts. We have access to the Program and Field Offices to help encourage grantees to correspond and participate in the interviews. We expect a very high response rate. For the RHED grantees, we have designed our selection criteria for the purposive sample with response rate in mind and have selected purposively to answer the research questions of the evaluation and to minimize missing data.

2.3 Unusual Problems Requiring Specialized Sampling Procedures

The only unusual problems have been described above and mainly relate to attempting to collect data on a program—the RHED grant—that was last awarded in 2009. We have adopted a purposive sampling procedure to account for this. Additionally, the contract requires a certain number of Tribal entities for the site visit and we have taken that into account as well.

2.4 Use of Periodic Data Collection Cycles to Reduce Burden

This is a one-time survey and we will make every effort to reduce burden on the grantee and accommodate their schedule. That has been a staple of our conversations with the grantees during the preliminary site visits.

3. Describe the methods used to maximize response rates and deal with non-response. The accuracy and reliability of the information collected must be shown to be adequate for the intended uses. For collections based on sampling, a special justification must be provided if they will not yield “reliable” data that can be generalized to the universe studied.

The accuracy and reliability of the collected data depend more on a depth of understanding from the respondent and the ability of the interviewers to ask probing and follow-up questions. However, for the RIF survey in particular, participation is important to get an accurate description of the program as a whole.

To increase participation and ensure that we receive responses from all current RIF grantees, we will take several steps.

First, we will enlist the RIF and RHED Program Offices to contact grantees and encourage them to respond. The Program Offices will also contact the local HUD Field Office representatives and ask them to contact the grantees if we have any difficulties with communication.

Secondly, the data collection instruments have been made as respondent-friendly as possible. The survey instrument and the discussion guide have both been reduced in length, given our experience during the preliminary site visits. Additionally, in our experience, grantees are eager to discuss the activities and success of their organizations. We encourage this by explaining up front that this is a *programmatic evaluation* and not a monitoring visit or audit and by offering confidentiality and anonymity to the respondents.

Additionally, all our communications and instruction guides will identify specific respondents instead of being generically addressed to “grantee.” This will include follow-up “thank you” communications to the respondents.

Finally, as mentioned in response to Question 2.1, we determined that a true random sample of the RHED grantees for the RHED Telephone Survey would result in significant amounts of missing data, especially for grants awarded early in the RHED program's history. Staff will have moved on, organizations will have merged or disappeared, etc. This would make it difficult to implement a truly random sample and the missing respondents would make it difficult to generalize, rendering the primary benefit of a random moot.

Therefore, we choose to survey a purposive sample of RHED grantees. While the information collected from this sample cannot be generalized to the universe of respondents, it will reduce costs and allow us to focus our inquiries on those grantees most likely to provide insight into the three main research topics – leveraging, partnerships, and program outcomes and impact. We will make note of the purposive sample and address the generalizability of our findings in our final report.

4. Describe any tests of procedures or methods to be undertaken. Tests are encouraged as effective means to refine collections, but if 10 or more test respondents are involved, OMB must give prior approval.

The discussion guide and the survey instruments were pre-tested during four “preliminary site visits” conducted during March and April 2014. During these site visits, we interviewed staff from four distinct rural organizations: the Housing Development Alliance of Hazard, KY; the Macon Ridge Community Development Corporation (MRCDC) of Ferriday, LA; the Karuk Tribe of California of Happy Camp, CA; and the Nogales Community Development Corporation (NCD). These four organizations each represented one of the four disadvantaged areas the RHED and RIF programs focus on serving: Appalachian, the Mississippi Delta Region, Federally Recognized Indian Tribes, and colonias.²³

From these four preliminary site visits, we significantly revised our survey instruments and discussion guides compared to their original format in the Data Collection and Analysis Plan (DCAP) based on comments and responses from grantee staff as well as discussions with local Field Office staff.

5. Provide the name and telephone number of individuals consulted on the 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.

HUD contracted with Econometrica (prime contractor) to conduct the Evaluation of the Rural Innovation Fund. James Hedrick and Dr. Richard Hilton are the Co-Principal Investigators. Chuck Hanson serves as Project Director. The data collection instruments were developed by an Econometrica team that included the Co-Principal Investigators as well as Dr. Lee Higgins, an outside consultant heavily involved in the project.

Several HUD staff members provided comments on the draft of the Research Design and DCAP, which included early versions of these data collection instruments. Aaron Taylor of the RIF

²³ See also Section 1.1 for information on the disadvantaged target groups.

Program Office and Jackie Williams of the RHED Program Office both provided comments on the Research Design and DCAP, which included comments on the data collection instruments and the sampling procedures. Additionally, Ndeye Jackson, Mark Schroder, and Beth Honadle of PD&R provided comments on these documents as well. Table 4.1 provides this information in tabular form, complete with contact information.

The overall evaluation includes 11 more site visits. This requires a team to visit all these sites, administer the discussion guide, and collect data. Table 4.2 includes the individuals we are planning on using for this portion of the project.

All data organization and analysis will be conducted by the two Co-Principal Investigators, with assistance primarily from Dr. Higgins. If necessary, we will consult the Program Office and PD&R representative already mentioned.

Table 4.1

Individuals Consulted on Statistical Aspects of the Design		
Name	Affiliation	Contact Information
James Hedrick	Econometrica	(240) 204-5143
Dr. Richard Hilton	Econometrica	(301) 657-1035
Chuck Hanson	Econometrica	(240) 333-4807
Dr. Lee Higgins	Independent Consultant	(202) 253-2833
Pam Glekas	HUD, Office of Community Renewal	(202) 402-4076
Jackie Williams	HUD, Office of Rural Housing and Economic Development	(202) 708-2290
Ndeye Jackson	HUD, Policy Development and Research	(202) 402-5737
Mark Schroder	HUD, Policy Development and Research	(202) 402-5922
Beth Honadle	HUD, Policy Development and Research	(202) 402-5740

Table 4.2

Site Visit Team		
Personnel	Position	Contact Information
Dr. Richard Hilton	Econometrica, Co-Principal Investigator	(301) 657-1035
James Hedrick	Econometrica, Co-Principal Investigator	(240) 204-5143
Chuck Hanson	Econometrica, Project Director	(240) 333-4807
Dr. Lee Higgins	Independent Consultant	(202) 253-2833
Wayne Mundy	Econometrica, Senior Analyst	(907) 598-1510
Alex Thackeray	Econometrica, Senior Analyst	(502) 767-2107
Dr. Kristen Corey	Econometrica, Senior Analyst	(240) 333-4814