# Evaluation of the Rental Assistance Demonstration (RAD) Program, Phase 1

# Supporting Statement for Paperwork Reduction Act Submission, Part A

U.S. Department of Housing & Urban Development (HUD)
Office of Policy Development & Research (PD&R)

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# Supporting Statement for Paperwork Reduction Act Submission, Part A Evaluation of the Rental Assistance Demonstration (RAD) Program, Phase 1

#### **SUMMARY**

The U.S. Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) Program, authorized by the Consolidated and Further Continuing Appropriations Act of 2012 (Public Law 112-55, approved November 18, 2011), is designed to provide affordable rental opportunities, preserve and improve the quality of the affordable housing stock, and expand families' choices of affordable rental homes located in a broad range of communities. This evaluation concentrates on the first component of the RAD program, which allows Public Housing and Moderate Rehabilitation (Mod Rehab) properties to convert to long-term Section 8 rental assistance contracts.

The RAD program is expected to demonstrate that project-based Section 8 HAP contracts will provide a stable, long-term form of public support for affordable housing; that converting public housing to Section 8 HAP contracts will enable affordable housing properties to gain additional access to private capital; and that the combination of stable public funding and flexible private capital will cover the long-term capital needs of the converted properties. In addition, the program's results are expected to show that the converted public housing properties will remain affordable, meeting the needs of low-income residents and ensuring that public ownership or control is maintained through long-term, renewable contracts and coterminous use agreements.

The evaluation contract was awarded by HUD to Econometrica, Inc., a small business located in Bethesda, MD, that has conducted evaluation research for the past 10 years for various federal government agencies. The results of this evaluation will allow HUD to determine whether the program objectives were met.

This evaluation will take place in two phases.<sup>1</sup> The first phase of the evaluation will include an assessment of the physical and financial condition of the RAD properties and a study of the implementation of the RAD program. This first phase also includes enrolling residents into a resident outcomes study that will be supported in the second phase of the evaluation. During this first phase of the study, Econometrica will assess the impact of the RAD program in two areas:

- 1. The preservation and improvement of former public housing units.
- 2. The amount of private capital leveraged as a result of such conversions.

This Paperwork Reduction Act (PRA) submission includes only the instrumentation required for use under the first phase of the RAD evaluation. It is expected that a second PRA package will be developed for the second phase of the RAD evaluation, including the instrumentation developed for the resident outcomes study to be conducted under phase 2, and will be submitted to OMB at a later date,

#### A. JUSTIFICATION

# 1. <u>Circumstances that make the collection of information necessary.</u>

<sup>&</sup>lt;sup>1</sup> This is a 5-year study: the base period (phase 1) runs for 3 years from December 30, 2013, to December 29, 2016, and the Option Period (phase 2), if funded, will run from December 30, 2015, to December 29, 2018.

RAD allows PHAs and owners to convert public housing and other HUD-assisted properties to long-term project-based Section 8 rental assistance and enables them to access private debt and equity to address immediate and long-term capital needs of the projects. The RAD program consists of two components, only the first of which is the subject of this evaluation. The first component involves a competitive application process through which up to 60,000 public housing and Section 8 Moderate Rehabilitation units will be selected to convert to two different forms of project-based Section 8 Housing Assistance Payments (HAP) contracts—either project-based vouchers (PBV) or project-based rental assistance (PBRA). The RAD authorizing statute requires that HUD assess three particular aspects of the program:

- 1. The preservation and improvement of former public housing units.
- 2. The amount of private capital leveraged as a result of such conversions.
- 3. The effect of conversion on residents.

The first phase of the evaluation will address items one and two from the list above, and are described in detail in this PRA submission. The third item above, the effect of the conversion on residents, will be implemented during the second phase of the evaluation. However, during the first phase, residents will be administered informed consent and enrolled into the outcomes study in order to enable the research team to begin tracking the study households.

This Information Collection Request (ICR) includes three data collection instruments: (1) a Physical and Financial Conditions Web Survey to be administered to 24 PHAs currently administering RAD, and a control group of 48 PHAs not implementing RAD (instrument included as Appendix A); (2) a RAD Implementation telephone survey to be administered to 100 entities engaged in RAD implementation or in the control group, including PHAs, stakeholders, implementation consultants, and/or project managers (instrument included as Appendix B); and (3) a Resident Intake Study Correspondence and Intake Form, which will be administered to 400 tenants of RAD projects to enable tracking of residents for a future tenant-level impact evaluation (form included as Appendix C). This ICR also includes five communications to survey respondents, including: Proposed Pre-Notification Email from HUD for PHA and Lender Web Survey, Proposed Follow-Up Message for Non-respondents for PHA and Lender Web Survey, Proposed Web Survey Instructions, Proposed Resident Enrollment Cover Letter. These communications introduce the evaluation to the survey respondents, and request their participation in the study.

The information sought through these data collection instruments not only supports HUD's Congressional mandate, but also supports two of HUD's Strategic Goals: Meet the Need for Quality Affordable Rental Homes and Utilize Housing as a Platform for Improving Quality of Life.

### 2. <u>1Purpose of the Information Collection.</u>

The information will be used by HUD to: (1) measure how the physical conditions and capital needs of RAD study sites change as a result of conversion and to compare those measures and experience to non-RAD sites and (2) examine the long-term financial viability of the converted public housing projects compared to non-RAD comparison sites. In addition, since RAD is a new

demonstration program, the telephone survey will capture the experiences of the individuals and organizations implementing the program and explore the implications of a broader implementation of the program.

HUD is seeking onetime approval for the administration of the three instruments within this ICR, including the Physical and Financial Conditions Web Survey, the RAD Implementation telephone survey, and the Resident Intake Study Correspondence and Intake Form. The responses to the Web survey questions are expected to explain how and to what extent the physical condition of the properties in the study were improved, explain what would have happened to the properties if they had not been in the program, categorize financing mechanisms, and link outcomes to viability. The information from the telephone interviews will explore the process of implementing RAD, as well as PHAs' rationale for opting into the program, or not. Although the resident survey will be developed and administered under the second phase of this evaluation, pending funding availability, data collection associated with enrollment and tracking of residents will occur during this first phase of the evaluation. Because a successful analysis of resident outcomes requires inclusion of former residents who do not return to converted units, enrollment and tracking of residents needs to begin as early as possible after properties begin the RAD process in order to ensure residents' contact information is obtained before they leave the RAD property.

The findings resulting from this first phase of the evaluation will be presented in an interim report to the Office of Policy Development and Research (PD&R). PD&R disseminates studies and publications through their Web site at <a href="https://www.huduser.org">www.huduser.org</a>. HUD publication policies and procedures comply with all applicable Information Quality Guidelines.<sup>2</sup>

Econometrica, as the prime contractor, will administer both the Physical and Financial Conditions Web Survey and the RAD Implementation telephone survey. The Urban Institute and its subcontractor, SSRS, will be responsible for the collection and use of the enrollment and tracking information for the resident survey. Tracking and contact information will serve two purposes. A primary use will be to locate residents enrolled in the resident study in order to administer a resident survey during the second phase of the evaluation, should HUD choose to pursue this option. In addition, the address information from the enrollment and tracking form will be used to help assess the quality of neighborhoods to which residents temporarily relocated during the conversion process, and/or the quality of neighborhoods to which residents who did not return to the project after conversion relocated. Data on household composition will be used to identify changes in household composition of those relocated during the RAD conversion process.

#### 3. Use of information technology.

This collection of information includes (1) a self-administered Web survey, the Physical and Financial Conditions Web Survey and (2) telephone interviews, the RAD Implementation telephone survey. Web-based surveys are now widely used in social science research, through which the recipients have the ability to complete the survey online at their convenience. The

<sup>&</sup>lt;sup>2</sup> HUD Information Quality Guidelines were published November 18, 2002. See: <a href="http://www.hud.gov/offices/adm/grants/qualityinfo/fr4769n02-final.pdf">http://www.hud.gov/offices/adm/grants/qualityinfo/fr4769n02-final.pdf</a>.

Web survey contains instructions, help screens, definitions, automated skip patterns, and other aids that guide respondents through the survey and reduce respondent burden.

The Web surveys will also contain prefilled information gathered from HUD administrative and other data, democratized data sets, and program applications. The survey will include several features to help the respondents, such as radio buttons, drop-down lists, text boxes, and a help feature that will allow respondents to see further explanations and definitions of technical terms referenced in the survey.

### Additional key features include:

- Secure data entry.
- User login save/review and submit capabilities.
- Navigation to access different sections.
- Navigation to access different screens sequentially or non-sequentially.
- Interactive features to address questions.

We will launch the survey via an integrated system capable of sending personalized email cover letters, tracking which of the respondents have not completed the survey, and sending out reminders. The responses will be shared with Econometrica team members only. One hundred percent of the data gathered through the Web survey will be collected electronically.

The telephone interviews will be conducted by trained Econometrica team members. The interviews will be conducted by a team of two researchers (a senior and a junior member) with the possibility of recording the interview, if the respondent agrees to be recorded. The recording will be shared with Econometrica staff only. The nature of the survey instrument, which includes primarily open-ended discussion questions, does not lend itself to automated data collection techniques; therefore, there will be no portion of the telephone survey that will be automated.

The tracking form is used to enroll residents in the outcomes study. The actual data collection for the outcome study will be a separate data collection after the option is exercised.

The Resident Intake Study Correspondence and Intake Form primarily consists of questions seeking different ways to contact residents of RAD properties who agree to participate in the tenant-level impact evaluation to be conducted during phase 2.. Since many PHA residents may not have regular access to electronic communication modes, the primary form of data collection will be a brief written survey to be mailed to a sample of residents selected for the resident study. We expect to use a random sample stratified by age, family status/household size, and race. In some properties, all residents may be chosen for the sample. SSRS will use the same form to conduct telephone interviews to obtain the same types of contact information from residents who do not respond to the written form. SSRS will use address information available from HUD's PIC/TRACS data system, and will draw upon secondary sources, such as the reverse yellow pages, to acquire telephone numbers for sampled addresses. The average time assumed to provide the information sought is 5 minutes, which would not be shortened by use of electronic, mechanical, or other technological collection techniques.

All information will be protected and held confidentially.

# 4. Describe efforts to identify duplication.

There is no existing data source that can readily be analyzed to document the program impact as required under the program's authorizing statute, namely (1) the preservation and improvement of former public housing units, (2) the amount of private capital leveraged as a result of such conversions, and (3) the effect of conversion on residents. All available data from HUD administrative sources and RAD applications will be incorporated into the analysis file by the research team.

The proposed Resident Intake Study Correspondence and Intake Form is specific to the resident study component of the RAD evaluation. Residents have not previously been asked to enroll in this study. Additional contact information requested is not reliably available from other sources, such as the PHA.

## 5. <u>Impact on small businesses or other small entities.</u>

Small businesses or other small entities are not part of the target population of this information collection effort. The information collection is limited to RAD program participants, other public housing developments that are similar to the program participants chosen for comparison, PHA representatives, PHA partners, consultants and financial institutions, and residents who will be asked to complete the enrollment form.

# 6. <u>Consequences if the collection is not conducted or is conducted less frequently.</u>

The RAD authorizing statute requires that HUD assess three particular aspects of the program: (1) the preservation and improvement of former public housing units, (2) the amount of private capital leveraged as a result of such conversions, and (3) the effect of conversion on residents. The evaluation described in this ICR represents HUD's effort to be responsive to this Congressional mandate to document the impact of the program. HUD does not have any other means to collect the information Congress is requesting.

Although the resident survey will be developed and administered under the second phase of this evaluation, pending funding availability, data collection associated with enrollment and tracking of residents will occur during this first phase of the evaluation. Because a successful analysis of resident outcomes requires inclusion of former residents who do not return to converted units, enrollment and tracking of residents needs to begin as early as possible after properties begin the RAD process in order to ensure residents' contact information is obtained before they leave the RAD property. Failure to obtain contact information on residents that is needed to help locate those households who move as a result of RAD conversion and do not return to the converted property may compromise HUD's ability to obtain adequate response rates for the resident survey, and limit the Department's ability to report on the program's impact on residents. This is a onetime data collection effort, and an inability to collect this data will render HUD unable to assess the overall impact of the RAD program.

## 7. Special circumstances.

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320.6 (Controlling Paperwork Burdens on the Public – General Information Collection Guidelines). There are no special circumstances that would require this information collection to be conducted in a manner that would be inconsistent with OMB guidelines.

# 8. Federal Register Notice/Consultation Outside the Agency.

In accordance with the Paperwork Reduction Act of 1995, HUD published a 60-Day Notice of Proposed Information Collection in the *Federal Register* on June 25, 2014. The docket number was **FR-5758-N-09**, and the notice appeared on pages 36086–36087. The notice provided a 60-day period for public comments, and comments were due by August 25, 2014. No public comments on the proposed information collection were received. A copy of the notice is included as Appendix D.

# 9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts will be provided to respondents of either the Physical and Financial Conditions Web Survey or the RAD Implementation telephone survey. A \$5 gift card will be provided to tenants that complete the Resident Intake Study Correspondence and Intake Form.

# 10. Assurance of confidentiality.

HUD's contractor, Econometrica, provides written assurances of confidentiality to all survey respondents. Econometrica has established stringent procedures and safeguards for securing and protecting against inappropriate disclosure or release of confidential information that will be collected during this evaluation. Where opinions are elicited from individuals, the confidentiality agreement stands; the data that Econometrica provides to HUD will be purged of information that would enable the Department to identify a specific individual, including a PHA official, offering personal and confidential opinions. This will not apply to the bulk of information that is collected, but only to that information that is of a personal and confidential nature as indicated on the survey.

The information gathered during this research effort will be used only for the purposes of this evaluation and will not be used by HUD for grantee monitoring. All Econometrica team members that will have access to these data will sign "Assurances of Confidentiality" pledges.

The statutory authority related to HUD's ability to conduct research through a contract with Econometrica is summarized below:

a. Section 3(b) of the Department of Housing and Urban Development Act, as amended, 42 U.S.C. 3532, authorizes the Secretary to "conduct continuing comprehensive studies, and make available findings, with respect to the problems of housing and urban development."

- b. Section 7(r)(1) of the Department of Housing and Urban Development Act, as amended, 42 U.S.C. 3535, provides that appropriated funds "shall be available to the Secretary for evaluating and monitoring of all such programs . . . and collecting and maintaining data for such purposes." Subsection (r)(4)(a) of the act further provides that the Secretary "may provide for evaluation and monitoring under this subsection and collecting and maintaining data for such purposes directly or by grants, contracts, or interagency agreements."
- c. Section 502(g) of title V of the Housing and Urban Development Act of 1970, as amended, 12 USC 1701z-2 (g), authorizes the Secretary "to request and receive such information or data as he deems appropriate from private individuals and organizations, and from public agencies." It further provides that "[a]ny such information or data shall be used only for the purposes for which it is supplied, and no publication shall be made by the Secretary whereby the information or data furnished by any particular person or establishment can be identified, except with the consent of such person or establishment."

Prior to beginning data collection, HUD will consider the applicability of completing a Privacy Impact Assessment (PIA) and/or a System of Records Notice (SORN). If either of these two steps is found to be necessary, HUD will file the PIA with the Department and publish the SORN in the Federal Register, as required, prior to data collection.

Some of the information essential for the research is information required by regulations governing the RAD program. For example, every RAD applicant is required to provide information on the RAD application to HUD.<sup>3</sup> The HUD program office will supply those data to Econometrica. Any information not in the RAD application needed for the first phase of the evaluation will be collected by administering the three data collection instruments submitted for review with this ICR.

Each contact person selected to respond to the Web survey will be given a password to access and complete the survey. For the Web survey respondents and the interviewees, Econometrica will provide a clear overview of the study's purpose, reasons why it would be in the interest of the program to respond, an assurance as to the legitimacy of the survey, and the name of a person the respondent can contact directly if the respondent has questions.

Administration of the Resident Intake Study Correspondence and Intake Form will be handled by SSRS under subcontract to the Urban Institute. The Urban Institute maintains an Institutional Review Board (IRB) to ensure that research practices and procedures effectively protect the rights and welfare of human subjects, consistent with the requirements set forth in Title 45, Part 46, of the *Code of Federal Regulations* (45 CFR 46). The Urban Institute's policy is that all research involving human subjects must adhere to the following principles, among others:

- Risks to human subjects from research must be reasonable in relation to anticipated benefits and must be minimized to the extent possible.
- Human subjects must be fully and accurately informed of the nature of the research in which they will be involved, whether their participation is mandatory or voluntary, any

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<sup>&</sup>lt;sup>3</sup> The application is at http://portal.hud.gov/hudportal/HUD?src=/RAD/application-materials.

- consequences of non-participation, any risks associated with their participation, and how the research will be used.
- Adequate provision must be made to protect the privacy of human subjects and to maintain the confidentiality of data that are collected, where promised and as appropriate.

In accordance with these policies, the Urban Institute and SSRS will maintain the following procedures:

- Prior to collecting data from residents, informed consent will be administered to all research subjects (potential resident survey respondents). They will be given a clear overview of the study and its goals, the data security plan, the staff confidentiality agreement, and our methods for safeguarding anonymity in our reports and publications. We will stress the voluntary nature of participation and make clear that there are no negative consequences for those who choose not to participate. This information will be provided in a letter accompanying the enrollment and tracking form and will be read to residents who are enrolled over the telephone.
- The Urban Institute and SSRS will safeguard the information gathered from participants. Data gathered from the tracking forms will be analyzed and discussed exclusively in the aggregate; no published reports using the survey data will single out any particular residents. Information identifying particular respondents will be shared only with staff members who have signed Data Confidentiality Pledges and who need the information for research purposes. All such Urban Institute and SSRS staff members will sign this pledge. Hard-copy materials containing respondent identifying information will be locked up when not in use, and electronic materials with identifying information will be stored on a secure server in password-protected and/or encrypted files, where appropriate.

#### 11. Questions of a sensitive nature.

No questions of a sensitive nature are included within this information collection request.

### 12. Provide an estimate of the burden, in hours and cost, of the collection of information.

**Burden Hours:** 

Tables 1, 2, and 3 demonstrate how the burden hours are calculated for the three data collection instruments included under this ICR: the Physical and Financial Conditions Web Survey, the RAD Implementation telephone survey, and the Resident Intake Study Correspondence and Intake Form. The estimates below are based on information from a consultant familiar with the RAD application. Table 4 demonstrates how the burden hours are calculated for the five planned communications to survey respondents. The annual burden is expected to be a total of 251.1 (72+100+67+12.1) hours.

Table 1. Estimated Total Burden Hours for the Physical and Financial Condition Survey

		C.		E.
A.	B.	Total Number of	D.	Total Burden
Respondent	Number of	Responses	Burden per	Hours
Category	Respondents	Required	Survey	C*D
RAD Projects	24	24	1 hour	24
Non-RAD	48	48	1 hour	48
Total	72	72	1 hour	72

**Table 2. Estimated Total Burden Hours for the Implementation Survey** 

A. Respondent Category	B. Number of Respondents	C. Total Number of Responses Required	D. Burden per Survey	E. Total Burden Hours C*D
PHAs, Stakeholders, Implementation Consultants, Project Managers	100	100	1 hour	100
Total	100	100	1 hour	100

Table 3. Estimated Total Burden Hours for the Resident Intake Study Correspondence and Intake Form

A. Respondent Category	B. Number of Respondents	C. Total Number of Responses Required	D. Burden per Survey	E. Total Burden Hours C*D
Tenants Willing to Participate in the Study	400	400	10 minutes	67
Total	400	400	10 minutes	67

Table 4. Estimated Total Burden Hours for the Communications to Survey Respondents

A. Communication	B. Respondent Category	C. Number of Respondents	D. Burden per Communicatio n	E. Total Burden Hours C*D
Proposed Pre- Notification Email	RAD Projects	24	1 minute	0.4
from HUD for PHA and Lender Web Survey	Non-RAD	48	1 minute	0.8

A. Communication	B. Respondent Category	C. Number of Respondents	D. Burden per Communicatio n	E. Total Burden Hours C*D
Proposed Email Survey Invitation for PHA and	RAD Projects	24	1 minute	0.4
Lender Web Survey	Non-RAD	48	1 minute	0.8
Proposed Follow- Up Message for Non-respondents	RAD Projects	12	1 minute	0.2
for PHA and Lender Web Survey	Non-RAD	24	1 minute	0.4
Proposed Web	RAD Projects	24	2 minutes	0.8
Survey Instructions	Non-RAD	48	2 minutes	1.6
Proposed Resident Enrollment Cover Letter	Tenants Willing to Participate in the Study	400	1 minute	6.7
Total	Total	652		12.1

# Annualized Cost of Burden Hours:

Tables 5, 6, and 7 demonstrate the annualized cost of the projected burden hours for each of the three instruments.

Table 5 illustrates the annualized cost of the projected burden hours for the Physical and Financial Conditions Survey. Table 6 illustrates the annualized cost of the projected burden hours for the Implementation surveys. Based on information from several sources, including HUD RAD program staff members, we estimate that the contact person(s)—typically a project manager—in charge of answering the questions about the project, on average, makes approximately \$63 per hour, including overhead.<sup>4</sup>

Table 5. Estimated Total Cost of Completing the Survey for the Physical and Financial Condition Survey

A. Respondent Category	B. Number of Respondents	C. Hourly Wage, Including Benefits	D. Burden Hours	E. Total Grantee Cost C*D
RAD Project Manager or PHA Representative	72 (24 RAD properties + 48 non-RAD properties)	\$63	72	\$4,536
Total	72	\$63	72	\$4,536

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<sup>&</sup>lt;sup>4</sup> The hourly salary ranges from approximately \$25 to \$58. If we apply 50 percent overhead, the total hourly salary including overhead would range between approximately \$38 (\$25\*1.50) and \$87 (\$58\*1.50). See <a href="http://www.salaryexpert.com/index.cfm?fuseaction=browse.salary-data-by-hourly&positionid=252301">http://www.salaryexpert.com/index.cfm?fuseaction=browse.salary-data-by-hourly&positionid=252301</a> for salary ranges.

Table 6. Estimated Total Cost for Completing the Implementation Surveys

A. Respondent Category	B. Number of Respondents	C. Hourly Wage, Including Benefits	D. Burden Hours	E. Total Burden Hours C*D
PHAs, Stakeholders, Implementation Consultants, Project Managers	100	\$63	100	\$6,300
Total	100	\$63	100	\$6,300

To calculate the total annual cost burden to respondents for completing the Resident Intake Study Correspondence and Intake Form, the Urban Institute used occupational employment statistics from the U.S. Department of Labor's Bureau of Labor Statistics to identify mean hourly wages (as classified by Standard Occupational Classification (SOC) codes) for potentially relevant occupations for resident heads of household, as shown in Table 7. The average for these three occupations, or \$12.11 per hour (approximately \$2 for 10 minutes—the estimated time to complete the 5-minute enrollment and tracking form twice, at initial and follow-up administration), was used to calculate the estimate of total respondent costs ( $$2 \times 400 = $800$ .)

Table 7. Estimated Median Wages of Resident Intake Study Correspondence and Intake Form Respondents

Occupation	SOC Code	Hourly Mean Wage (May 2013)
Food Preparation and Serving Workers	35-3021	\$9.08
Laborer	53-7062	\$12.83
Office Clerk	43-9061	\$14.42
Average across occupations		\$12.11

Source: Occupational Employment Statistics, Data Tables for the Overview of May 2013 Occupational Employment and Wages. Accessed online on April 7, 2014, at <a href="http://www.bls.gov/oes/2013/may/featured\_data.htm">http://www.bls.gov/oes/2013/may/featured\_data.htm</a>.

The total annual cost burden to the survey respondents, interview respondents, and resident respondents is estimated at \$11,636 (4,536+6,300+800).

### 13. Capital costs.

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

### 14. Provide estimates of annualized cost to the federal government.

The following Table 8 displays estimates of the one-time costs to the federal government for data collection performed by Econometrica and its subcontractors, the Urban Institute and EMG. There are no estimated recurring costs.

**Table 8. Estimated Cost to the Federal Government** 

Data Collection	Ave	ntractor erage ly Cost	B. Hours to Develop and Populate Survey Form	C. Hours to Maintain Website, Contact Non- Respondents and Answer Questions	Total stimated Cost A*(B+C))
Physical and Financial Condition					
Survey	\$	135.50	30	60	\$ 12,195.38

Data Collection	A. Contractor Average Hourly Cost	B. Contractor Average Hours per Survey	C. Number of Surveys	Total Estimated Cost (A*B*C)
Implementation Survey	\$ 135.50	2	100	\$ 27,100.85

Data Collection	A. Contractor Average Hourly Cost		B. Contractor Average Hours per Participant	C. Number of Participants	Total stimated ost (A*B*C)
Resident Intake Study					
Correspondence and Intake Form	\$	143.63	0.5	400	\$ 28,726.40

**Total Estimated Annualized Cost to the Government** \$ 68,022.63

# 15. Explain the reasons for any program changes or adjustments.

This ICR is a new request and does not result from any program changes or adjustments.

# 16. For collections whose results will be published, outline the plans for tabulation and publication.

The results of the evaluation covered by this ICR will be documented in a report to HUD, which is currently scheduled to be delivered in August 2015. In this report, Econometrica will provide summary aggregated data documenting study findings. HUD plans to publish the findings of the evaluation on their Web site, located at <a href="https://www.huduser.org">www.huduser.org</a>, at the conclusion of the study.

Data collection using the Physical and Financial Condition Web survey and the Implementation telephone interviews will be administered as soon as possible after receiving OMB approval, but not until the RAD program participant properties have gone to closing. Once the RAD properties have been selected for the study, the comparison of non-RAD properties can be chosen; thus, the data collection will proceed on a rolling schedule once OMB approval has been received.

For the resident portion of the study, we assume that residents will not be dislocated from their units for at least a month after the property is fully registered as a RAD program participant. The administration of the Resident Intake Study Correspondence and Intake Form will therefore take place on a rolling basis following project closure, once OMB approval has been received. In the event that we are unable to enroll residents before displacement, a sampled property may be replaced for the purposes of the resident survey with a similar property from the pool of eligible properties.

Data will be collected and stored in Microsoft Excel files, a Microsoft Access database, and recordings (if approved by the entity being interviewed during the telephone surveys). Data analysis will be primarily conducted using SAS.

Table 9 provides a timeline for the base period data collection and fieldwork for the three study components.

Table 9. Base Period Data Collection and Fieldwork Timeline<sup>5</sup>

Task	Beginning Date	End date
a. Conduct Web surveys of study properties for the Physical and Financial Condition Study component	Immediately after receipt of OMB Approval	The survey will close three months after receipt of OMB approval or January 31, 2015.
b. Conduct interviews with study properties' representatives for the Implementation Study	Immediately after receipt of OMB Approval	The interviews will conclude four months after receipt of OMB approval or February 27, 2015.
c. Administer the Resident Intake form	Immediately after receipt of OMB Approval	Three months after receipt of OMB approval or January 31, 2015.

Table 10 provides a timeline for the data analysis activities related to the Physical and Financial Condition and the Implementation Study

Table 10. Data Analysis Timeline<sup>5</sup>

Task	Beginning Date	End date
a. Analyze results of the Web Surveys of Study Properties for the Physical and Financial Condition Study Component	Immediately after the survey closes (see Table 9 above)	No later than the conclusion of the base period (December 29, 2016)
b. Analyze the results of the interviews with study properties' representatives for the Implementation Study	Immediately after the interviews are completed (see Table 9 above)	No later than the conclusion of the base period (December 29, 2016)

<sup>&</sup>lt;sup>5</sup> These dates assume an October 31, 2014, approval date from OMB. Slippage in the OMB approval date could delay the start and completion of data collection and analysis activities.

Task	Beginning Date	End date
c. Assemble the resident contact	Immediately after receipt of	As soon as all the contact forms
information	OMB approval	are returned

# 17. Expiration date

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

# 18. Certification statement

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