Souza, Teresa

From:

Souza, Teresa

Sent:

Tuesday, September 08, 2015 11:13 AM

To:

Jim Cegla

Cc: Subject: 'gary@garyponder.org'; Pollard, Colette; Star, Carol S; 'dlaluces@bctpartners.com' Response to comment on HUD's 60-Day Notice of Proposed Information Collection for the

Evaluation of the Section 811 Project Rental Assistance Program, Phase I (Docket No

FR-5837-N-03)

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Dear Mr. Cegla,

Thank you for commenting on HUD's 60-Day Notice of Proposed Information Collection for the Evaluation of the Section 811 Project Rental Assistance Program, Phase I (Docket No FR-5837-N-03). This email responds to those comments.

You commented regarding the necessity of interview questions as many of the questions are already spelled out in the grant application. On a related note, in your response to item 3, you suggested that the burden can be reduced if interviewers obtain information from application already submitted to the extent feasible. That latter point is indeed our intent. Interviewers will review grant applications and annotate in their records questions already spelled out in the application *prior to* the collection of information. Since this appears to be unclear in the data collection package, we are clarifying this in the revised survey instruments. However, it is important to note that this is a process evaluation and, as such, we are interested in learning about changes that might have taken place between the applicants' 2013 program design and the implementation taking place currently. To that end, we believe it is important for the interviewer to check if areas of the program design have changed, even though it may come at the cost of some amount of repetition.

You further commented about the insufficiency of the estimated time to collect the information. Two clarifications are in order. First, the estimated time is an average, and as such, it is possible that interviews in some states, with more complex program structures, can take longer, while interviews in other states, with less complex program structures, might be shorter. Second, grantees will not be asked to complete the survey in writing. Instead, the information will be collected through verbal responses which we anticipate will take substantially less time. That said, in the interest of caution, and based on your feedback and additional information received, we will add one hour per response to the estimate to ensure that we are not underestimating the burden of the proposed information collection.

We hope these clarifications and changes to the proposed information collection package address your concerns and comments. Please feel free to contact me or the site lead from BCT, Gary Ponder (gary@garyponder.org and 202-684-8680) if you have additional questions or concerns.

Sincerely,

Teresa Souza

Teresa Souza, Ph.D.
Social Science Analyst
Office of Policy Development & Research
Department of Housing and Urban Development
451 7th Street SW, Washington, DC 20410
202.402.5540

Teresa.Souza@hud.gov

Souza, Teresa

From:

Souza, Teresa

Sent:

Wednesday, September 09, 2015 7:35 AM

To:

'Isloane@tacinc.org'

Cc:

Pollard, Colette; Star, Carol S; dlaluces@bctpartners.com

Subject:

Response to comment on HUD's 60-Day Notice of Proposed Information Collection for the

Evaluation of the Section 811 Project Rental Assistance Program, Phase I (Docket No

FR-5837-N-03)

Categories:

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Dear Ms. Sloane,

Thank you for commenting on HUD's 60-Day Notice of Proposed Information Collection for the Evaluation of the Section 811 Project Rental Assistance Program, Phase I (Docket No FR-5837-N-03). This email responds to your comments.

You suggested that we consider sending the survey instruments to grantees ahead of the site visits. We considered your suggestion and although we agree that this approach has benefits, we have opted not to do so as we fear it would overwhelm and impose an unintentional burden on grantees. Grantees might feel obligated to write answers and expend additional time on these instruments. That is not the intention of the proposed information collection. The surveys are designed to have interviewers draw as much information as possible from grant applications, using site visits to expand upon questions and verify changes to the original program design. The information will be collected through verbal responses which we anticipate will limit the estimated burden of collection on grantees.

You also suggested that we consider interviewing other State Human Services agencies involved in the Section 811 Project Rental Assistance Program implementation. This is indeed our intent. As described in the package, "within each state, interviews will be conducted with the grantee agency, the Medicaid partner agency, and any other state agencies that have partnered with the grantee agency to implement the PRA Demonstration" (Section 811 PRA Demonstration Evaluation – Phase I, Office of Management and Budget Submission Part A – Justification, Page 5).

Finally, you suggested clarifications, revisions and changes in terminology to the questionnaire to better align the survey to the program. We appreciate your suggestions and have incorporated your proposed revisions to the questionnaire.

We hope these clarifications and changes to the proposed information collection package address your concerns and comments. Please feel free to contact me if you have additional questions or concerns.

Sincerely,

Teresa Souza

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