

**Supporting Statement for
Paper Reduction Act Submission
Evaluation of the Section 811 Project Rental Assistance (PRA)
Program – Phase II
OMB 2528-0309**

Part A

November 27, 2017

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A. Justification

1. Circumstances Making the Collection of Information Necessary

The U.S. Department of Housing and Urban Development (HUD)'s Office of Policy Research and Development is undertaking an evaluation of the Section 811 Supportive Housing for Persons with Disabilities Project Rental Assistance (PRA) Program. Since 1991, HUD's Section 811 program has provided capital grants to non-profit sponsors to develop group homes and apartment buildings built specifically for very low-income non-elderly adults with disabilities. This program is known as the Section 811 Project Rental Assistance Contract (PRAC) Program. PRAC properties are primarily group homes or small apartment buildings.

In 2012, HUD launched a demonstration of a new variation of Section 811 called the PRA Program. The PRA program provides rental assistance funding to state housing agencies to work in partnership with state human services and Medicaid agencies to create community-based supportive housing for extremely low-income households with non-elderly adults with disabilities including those who are currently in or at risk for residing in institutions or are currently (or at risk for becoming) homeless. State housing agencies form an interagency partnership agreement with the state health and human service agency and the state Medicaid provider (if different) to identify individuals eligible to reside in PRA-subsidized units and to provide services and supports directly to residents.

The state housing agencies identify properties that are eligible to receive project rental assistance subsidies for a percentage of its units, and the property owners are recruited to agree to rent units to extremely low-income non-elderly adults with disabilities. The PRA program will provide rental assistance for apartments in affordable housing developments where not more than 25 percent of the units are occupied by people with disabilities. The goals of the PRA program are to expand the supply of affordable, community-based supportive housing units, integrating people at risk of homelessness or institutionalization into developments that house both people with and without disabilities.

There have been two rounds of PRA grants, the first in 2012 and the second in 2013, with 36 awards to 28 state housing agencies¹. This study is mandated under the Frank Melville Supportive Housing Investment Act of 2010, which requires an evaluation of the program's effectiveness. This evaluation focuses on a subset of six state Section 811 PRA programs. The six states selected to be the focus of this evaluation were selected based on the progress they have made implementing the PRA program, specifically, the number of units under contract. The states are California, Delaware, Louisiana, Maryland, Minneapolis, and Washington.

This submission is a substantial revision of currently-approved data collection. This evaluation is the second phase of a multi-phase evaluation. Phase I evaluated the early implementation of the Section 811 PRA Program in the 12 states that were awarded the first round of PRA grants in 2012.

This submission requests OMB approval for site visit interviews and resident surveys that will be conducted between September and December 2017 for Phase II of the Section 811 PRA evaluation. The evaluation will include in-person, semi-structured interviews with multiple stakeholders in the six grantee states.

This Information Collection Request (ICR) includes four data collection instruments:

¹ North Carolina was selected in the FY 2012 grant competition and the District of Columbia was selected in the FY2013 grant competition but they did not move forward with their grant award. North Carolina and the District of Columbia are not included in these counts of grant awards and state housing agencies.

- In-person and telephone interviews with *property owners and managers* (Appendix A)
- In-person and telephone interviews with *service providers* (Appendix B)
- In-person and telephone interviews with *public housing authority (PHA) staff* and managers (Appendix C)
- In-person surveys of *Section 811 PRA and PRAC residents* (Appendix D)

2. Purpose and Use of the Information Collection

This study is the second phase of a multi-phase evaluation. Phase I documented the implementation experience of the first 12 state housing agencies that were awarded the first round of PRA grants. In Phase II, the evaluation is focused on six states selected from 28 state grantees from the first and second rounds of PRA funding. The Phase II evaluation has three components:

- An **Implementation Study** to document the implementation of the PRA program based on interviews with key program administrators and review of PRA program documents and data;
- An **Impact Study** to assess the effects of the PRA program on participants' quality of life and care, housing and neighborhood, and utilization and access to health services and supports compared to three matched comparison groups. The impact study includes a **Descriptive Analysis** of PRA program outputs for all 28 Section 811 PRA grantees, based on HUD administrative data; and
- An **Economic Study** to measure the costs of housing and supportive services provided by the Section 811 PRA program and to attempt to measure the costs of healthcare utilization potentially affected by the PRA program, to compare these costs to other HUD assisted housing programs with and without structured access to services, and to compare costs to measured impacts.

This request for approval is for primary data collection activities that include in-person and telephone interviews with a sample of up to 24 property owners with units subsidized by Section 811 PRA; in-person and telephone interviews with up to 48 service providers who serve PRA residents; in-person and telephone interviews with up to 12 PHAs that, as part of the state housing agency's grant proposal, committed Housing Choice Vouchers or other rental units or established admissions preferences for people with disabilities as a supplement to the PRA program; and in-person surveys with up to 480 residents of Section 811 PRA and PRAC properties. The remainder of the study's data collection methods involves secondary administrative data or primary data collection and highly-tailored discussions with representatives of the six grantee state housing agencies and their partner state Medicaid agencies, each of which do not involve standardized data collection with more than nine respondents. The main data sources for the impact and economic studies are healthcare utilization data from the Centers for Medicare and Medicaid Services (CMS) and state Medicaid agencies and HUD administrative data on housing, unit, and tenant characteristics.

HUD and policy makers will use the information collected in this study to understand the effectiveness of the Section 811 PRA Program. The evaluation will provide insight to Congress, HUD, grantee states, and other interested parties on issues to consider as the Section 811 PRA Program continues to be implemented throughout the country. The study will also document the experience of property owners, service providers, PHA staff, and disabled residents with the integration of supportive housing in affordable rental developments.

The overarching research questions for this evaluation are:

- Do state housing agencies and their Medicaid agency partners develop effective, sustainable partnerships that result in a growing inventory of affordable rental units for extremely low-income people with disabilities?
- What is the early evidence on how PRA residents fare relative to similar individuals in the Section 811 PRAC program in terms of quality of life, housing and neighborhood characteristics, housing tenure, health and service utilization patterns?
- What is the early evidence of the cost-effectiveness of the PRA program?

Data collection will begin with recruitment of potential respondents with a letter that describes the study and a follow up recruitment and interview scheduling telephone call (see recruitment materials in Appendix D). Residents that cannot initially be reached by mail will be sent a postcard notifying them about the study. Exhibit A-1 presents the interview and survey data collection activities that are the subject of this revised request for approval, summarizing the purpose of the data collection in support of answering the research questions. The interview and survey data collection activities will primarily be used in analysis for the Implementation Study. Data from the surveys of Section 811 PRAC residents will also be used in analyses for the Impact Study and Cost Study.

Exhibit A-1: Summary of Interview and Survey Data Collection Activities

Interview/Survey	Purpose of Data Collection
Interviews with property owners	<ul style="list-style-type: none"> • Provide owner perspective on the implementation of the PRA grant, including challenges and successes, the owner selection process, the resident application process and why residents are found ineligible, the process of tenants transitioning into PRA units, and ongoing tenancy. • Provide information on property and unit amenities, including any modifications undertaken for PRA residents.
Interviews with service providers	Provide service provider perspective on the implementation of the PRA grant: <ul style="list-style-type: none"> • Resident application, eligibility, and process of transitioning into PRA units. • Provision and adequacy of transition and ongoing health and supportive services.
Interviews with PHAs that leveraged Housing Choice Vouchers (HCVs) for Section 811 PRA	Provide information on the procedures and preference systems for allocating HCVs to persons with disabilities in the grantees' states.
Surveys of Section 811 PRA and PRAC residents	<ul style="list-style-type: none"> • Provide tenant perspectives on the Section 811 application and tenant placement and occupancy procedures and how adequate the support is of people transitioning to community settings. • Provide tenant-reported information on housing and neighborhood quality, quality of life and care, and unmet needs.

On behalf of HUD, the information for the Evaluation of the Section 811 PRA Program will be collected by Abt Associates. The interviews and surveys described below will be conducted in person during site visits to each of the six states selected for the study. Site visitors will visit each state’s capital city, where the grantee agencies are located. Interviews that cannot be completed in person during the site visit will be conducted by telephone.

Interviews with property owners. Interviews will be conducted with up to four property owners with units subsidized by Section 811 PRA in each of the six states, for a maximum of 24 property owner interviews. Potential interviewees will be selected from among the property owner organizations with PRA units under lease at the time of the site visit, with some consideration given to varying the geographic location of the properties. The property owner interviews will provide the owner perspective on the owner’s reasons for participating in the program, the property selection process, the resident application process, the process of

applicants transitioning into PRA-subsidized units, and the ongoing tenancy and support of PRA residents. In some cases, separate interviews may need to be conducted with representatives of the property's owner organization to learn about the rental assistance contracting process and with onsite property managers to learn about the resident application process and tenancy of PRA residents. **The recruitment letter and interview guide for property owners and managers is submitted as Appendix A.**

Interviews with Service Providers. Site visitors will conduct interviews with staff from up to eight service provider organizations per state that serve PRA applicants and residents, for up to a total 48 service provider interviews. The service providers will provide their perspectives on the implementation of the Section 811 PRA program including the resident application process, how applicants transition into PRA units, and the provision and adequacy of transition and long-term supports and services. Each state's Medicaid agency will be asked to help identify service provider organizations from which to select staff to interview. The Medicaid agencies will be asked to identify service provider organizations that are actively serving PRA residents. Site visitors will interview management-level staff, rather than direct service providers or case managers, to provide a broader perspective on service provision to PRA residents or other people with disabilities in the state. Some organizations may choose to have several members of their staff, both supervisors and direct service providers, participate in the interview. **The recruitment letter and interview guide for service providers is submitted as Appendix B.**

Interviews with Public Housing Authority (PHA) Staff. Site visitors will conduct interviews with representatives from up to 12 PHAs that committed to issuing housing choice vouchers or other subsidized housing units to non-elderly people with disabilities in their regions as part of the grantee's application for PRA funding. Visitors will conduct the interviews with either the PHA's Executive Director or a management-level staff person who oversees the agency's leased housing programs. The PHA interviews will be conducted either by telephone or in person. The purpose of the PHA interviews is to learn more about their commitment of rental vouchers or other subsidized housing units for people with disabilities. The discussion guides will include questions on how HCVs are allocated to people with disabilities, how applicants learn about and apply for the subsidies, whether the residents receive any transition or ongoing supportive services tied to their rental subsidy, and how long the rental subsidies will be made available to people with disabilities. **The recruitment letter and interview guide for PHA staff is submitted as Appendix C.**

Surveys of Section 811 PRA and PRAC Residents. For the implementation analysis, the resident surveys will provide tenant perspectives on the Section 811 application and tenant placement and occupancy procedures and the adequacy of support for people transitioning to Section 811 subsidized housing. Survey responses will provide tenant-provided information on housing quality, neighborhood quality, quality of life and care, and identification of unmet needs for the Impact Study and Cost Study. In-person surveys will be conducted with up to 240 PRA residents and up to 240 PRAC residents in the six study states, for a total of up to 480 resident surveys. **The recruitment and screening materials, informed consent, and survey for Section 811 PRA/PRAC residents is submitted as Appendix D.**

The following exhibits (Exhibits A-2, A-3, and A-4) identify how the interviews and surveys will be used to address each of the three overarching research questions. The exhibits show the data sources, interview or survey domains, and measures that will be used to respond to the specific research questions within each of three main research interests.

Research question 1: Do state housing agencies and their Medicaid agency partners develop effective, sustainable partnerships that result in a growing inventory of affordable rental units for very low-income people with disabilities?

Exhibit A-2: Summary of Interview and Survey Data Collection Activities (Research Question 1)

How do grantee partnerships and capacity affect the implementation of the PRA program?		
Data Source	Interview/Survey Domain	Measures
Interviews with PHAs that leveraged HCVs for Section 811 PRA	PHA Program Background	<ul style="list-style-type: none"> • Previous experience administering a rental housing assistance program
Interviews with PHAs that leveraged HCVs for Section 811 PRA	Section 811 PRA Program Commitment	<ul style="list-style-type: none"> • Previous experience administering a joint supportive housing program for people with disabilities
Interviews with service providers	Partnerships and Organizational Structure	<ul style="list-style-type: none"> • Previous experience administering a joint supportive housing program for people with disabilities • Frequency and methods of communication among partners • Data sharing methods among partners
Interviews with property owners	Property owner information	<ul style="list-style-type: none"> • Previous experience administering a rental housing assistance program
What are the grantees' target populations, housing strategies, and outreach and referral processes?		
Data Source	Interview/Survey Domain	Measures
Interviews with property owners	Property owner information	<ul style="list-style-type: none"> • Experience planning for target population by type of disability
Interviews with property owners	Rental assistance contracts and payments	<ul style="list-style-type: none"> • Procedures for entering tenant data into TRACS • Procedures for submitting vouchers to HUD, requesting payment of subsidy, and distributing subsidy to property owners
Interviews with property owners	Resident application and eligibility	<ul style="list-style-type: none"> • PRA program application procedures • Waiting list procedures • Process for eligible applicants to apply for and lease PRA units • Eligibility requirements and determination procedures for property
Interviews with service providers	Outreach and referrals to the PRA program	<ul style="list-style-type: none"> • Planned and actual outreach and marketing strategies to potential PRA applicants • Waiting list procedures
Interviews with service providers	PRA program eligibility	<ul style="list-style-type: none"> • Eligibility requirements and determination procedures for the state's PRA program
Interviews with service providers	Transition services	<ul style="list-style-type: none"> • Process for eligible applicants to apply for and lease available PRA units
Interviews with PHAs that leveraged HCVs for Section 811 PRA	PHA Program Background	<ul style="list-style-type: none"> • Experience planning for target population by type of disability
What services and supports are offered during the transition process to PRA units?		
Data Source	Interview/Survey Domain	Measures
Interviews with property owners	Resident application and eligibility/Transition to PRA units	<ul style="list-style-type: none"> • Organizational structure for coordinating transition services and supports
Interviews with service providers	Transition services	<ul style="list-style-type: none"> • Assistance obtaining furniture and household goods • Assistance obtaining medical supplies for new residence • Transportation services • Housing modification services • Organizational structure for coordinating transition services and supports

Exhibit A-2: Summary of Interview and Survey Data Collection Activities (Research Question 1)

Surveys of Section 811 PRA and PRAC residents	Transition process	<ul style="list-style-type: none"> • Assistance provided to the applicant during the application process • Assistance obtaining furniture and household goods • Assistance obtaining medical supplies for new residence • Transportation services • Housing modification services
How are long term health and supportive services coordinated and monitored?		
Data Source	Interview/Survey Domain	Measures
Interviews with property owners	Resident tenancy and support	<ul style="list-style-type: none"> • Organizational structure for coordinating health and housing supportive services
Interviews with property owners	Closing questions	<ul style="list-style-type: none"> • Property manager perspective on tenant support and reasonable accommodations
Interviews with service providers	Long-term services and supports	<ul style="list-style-type: none"> • Methods of oversight of coordination and provision of transition services and supportive services • Organizational structure for coordinating health and housing supportive services
Interviews with service providers	Resident tenancy and support	<ul style="list-style-type: none"> • Service provider perspective on tenant support services and unmet needs in supportive services in the community
Surveys of Section 811 PRA and PRAC residents	Access to supportive services and unmet needs	<ul style="list-style-type: none"> • Resident feedback on quality of supportive services received • Resident report of unmet needs from supportive services
Surveys of Section 811 PRA and PRAC residents	Quality of life and community integration	<ul style="list-style-type: none"> • Resident feedback on tenancy support and reasonable accommodations by service providers, property managers, and others

Research Question 2: What is the early evidence on how PRA residents fare relative to similar individuals in the Section 811 PRAC program in terms of quality of life, housing and neighborhood characteristics, housing tenure, health and service utilization patterns?

Exhibit A-3: Summary of Interview and Survey Data Collection Activities (Research Question 2)

How do quality of life and care of PRA residents compare to PRAC residents?		
Data Source	Interview/Survey Domain	Measures
Surveys of Section 811 PRA and PRAC residents	Transition process	<ul style="list-style-type: none"> • PRA resident perspective on housing choice and whether housing and location preferences were met • Types of transition support services received • PRA resident satisfaction with quality of transition services received
Surveys of Section 811 PRA and PRAC residents	Access to Supportive Services and Unmet Needs	<ul style="list-style-type: none"> • Types of services received in home (personal care, behavioral health, case management) • Support received from informal caregivers • Transportation services • Housing modification and equipment • Unmet need for supportive services • Knowledge of who can help resolve problems (tenancy support) • Participant feedback on supportive services
Surveys of Section 811 PRA and PRAC residents	Housing quality	<ul style="list-style-type: none"> • Residents can be independent in the property
Surveys of Section 811	Help with supportive services	<ul style="list-style-type: none"> • Participant feedback on supportive services

Research Question 2: What is the early evidence on how PRA residents fare relative to similar individuals in the Section 811 PRAC program in terms of quality of life, housing and neighborhood characteristics, housing tenure, health and service utilization patterns?

Exhibit A-3: Summary of Interview and Survey Data Collection Activities (Research Question 2)

PRA and PRAC residents		
Surveys of Section 811 PRA and PRAC residents	Quality of Life and Community Inclusion	<ul style="list-style-type: none"> Residents know other people in the property Residents know other people in the neighborhood Residents reporting being able to see friends and family when they want to Participant-reported physical health status Participant-reported mental health status
How do housing and neighborhood characteristics for PRA residents compare to PRAC residents?		
Data Source	Interview/Survey Domain	Measures
Interviews with property owners	Property information	<ul style="list-style-type: none"> Building type and size
Interviews with property owners	Rental assistance contracts and payments	<ul style="list-style-type: none"> Percent of assisted housing units, market rate units, PRA units in property
Surveys of Section 811 PRA and PRAC residents	Housing quality	<ul style="list-style-type: none"> Resident perception of housing quality Resident perception of privacy in unit and property Resident perception of property and unit safety Resident-reported maintenance problems with unit Resident-reported maintenance problems with property Resident overall satisfaction with unit Resident overall satisfaction with property Resident satisfaction with property management Resident report of wanting to move from home and reason why
Surveys of Section 811 PRA and PRAC residents	Neighborhood quality	<ul style="list-style-type: none"> Resident perception of neighborhood safety Resident report of being able to get around neighborhood easily Resident report of being able to access transportation when they need it Participant report of access to grocery stores, pharmacies, healthcare services, etc. Overall satisfaction with neighborhood

Research Question 3: What is the early evidence of the cost-effectiveness of the PRA program?

Exhibit A-4: Summary of Interview and Survey Data Collection Activities (Research Question 3)

What are the per-participant costs of providing housing and disability-related supportive services in the PRA program, PRAC program, and other HUD-assisted housing including costs of program implementation and administration?		
Data Source	Interview/Survey Domain	Measures
Interviews with property owners	PRA Program Administration and Staffing	<ul style="list-style-type: none"> • Personnel • Program-specific materials and indirect costs • Administrative overhead
Interviews with property owners	Resident application and eligibility/Transition to PRA units	<ul style="list-style-type: none"> • Capital and operating costs of serving individuals with disabilities
Interviews with property owners	Resident tenancy and support	<ul style="list-style-type: none"> • Services received in home
Interviews with service providers	Partnerships and Organizational Structure/PRA Program Staffing and Costs	<ul style="list-style-type: none"> • Personnel • Program-specific materials and indirect costs • Administrative overhead
Interviews with service providers	Transition services	<ul style="list-style-type: none"> • Services received in home
Surveys of Section 811 PRA and PRAC residents	Transition process	<ul style="list-style-type: none"> • Assistance provided to the applicant during the application process • Housing modification services

3. Use of Improved Information Technology and Burden Reduction

The research team will make every effort to reduce the burden on the respondents, by making effective use of technology to streamline data collection procedures.

Surveys of Section 811 PRA and PRAC residents will be conducted in-person and administered orally by interviewers trained to work with sensitive health data and individuals with disabilities. The interviewers will use laptops and enter responses directly into an offline database. Use of the laptops will allow interviewers to quickly record data and continue with the interview without extended pauses or delays.

Interviews with property owners and managers, service providers, and PHA staff will be conducted in person (to the extent possible). The interviewers will record responses directly into Word documents on a laptop. Interview responses will be directly uploaded to nVivo, qualitative data analysis software for coding and analysis. The administrative interviews will be audio recorded if the respondent agrees to be recorded. Audio recordings will allow the research team to confirm responses without needing to contact respondents after the interview is completed. The study team is also developing a secure, web-based collaborative web-site so that the study participants can provide requested program documents electronically to the study team.

4. Efforts to Identify Duplication and Use of Similar Information

This study is a second phase of a multi-phase evaluation. As part of the design process for the study, the contractor conducted a review of literature regarding the Section 811 PRA Program. Other than data collection in Phase I of the evaluation, no other studies were identified that involved data collection with property owners

and managers, service providers, PHA staff, or residents in Section 811 PRA or Section 811 PRAC units. HUD is unaware of any other studies for which this study represents a duplicate research effort. The contractor will review data collection from Phase I of the evaluation to tailor the Phase II interviews to only cover new data collection, eliminating duplicative data collection efforts.

5. Impact on Small Businesses or Other Small Entities

This data collection effort includes interviews with owners and managers of rental properties and service provider agencies, and the owners and service providers could include small businesses entities. Organizations that provide services to PRA residents could also include small businesses. This is a voluntary survey. At most, 24 property owners and 48 service providers will participate in the data collection.

To minimize burden on small businesses, interviewers will conduct the interviews in person at a time and location of the respondent's choosing. If it is not practical for the interviewer to travel to the location of the small business, the interview will be conducted by phone. The interviewer will provide a list of interview topics prior to the scheduled interview. The interviewer will record the responses directly into a Word document on a laptop, reducing the need for later follow up with respondents for clarity of response.

The interview guides have been developed to capture only qualitative information that cannot be captured from other data sources. The study team will obtain information on characteristics of PRA properties and owners of PRA properties in administrative data received from HUD, information on PHAs from publicly-available datasets, and information on the types and costs of services provided by service providers from administrative data from CMS and state Medicaid agencies.

6. Consequences of Collecting the Information Less Frequently

This data collection effort will only be conducted once and under specific contract guidelines. Without this data collection effort, HUD will be unable to evaluate the implementation of the Section 811 PRA program, as mandated by Congress. The Frank Melville Supportive Housing Investment Act of 2010 requires HUD to describe the Project Rental Assistance provided, analyze the effectiveness of project rental assistance under the Section 811 program compared to the capital advance program, and make recommendations for future models of assistance under Section 811.

The Section 811 program continues to be an important approach used to assist nonelderly persons with disabilities and their families, and the information gathered through this study will allow HUD to better understand the different types of supporting housing assistance models that is being administered throughout the country and the characteristics of households served by these programs. As a program that HUD is continuing to fund in future years, HUD seeks to make every effort to ensure the successful implementation of the program. Without this type of data collection, HUD's ability to improve Section 811 programs as well as provide guidance to Section 811 grantees is limited.

Without the qualitative information from this data collection, the value of the study would be greatly reduced. Without administrative interviews, the study will have little insight into how the PRA programs are being administered by state housing agencies and their partnering agencies, and little insight into what aspects of the PRA program are associated with positive short-term outcomes. Without survey data from Section 811 PRA and PRAC residents, the study's impact analysis will be unable to compare characteristics of interest (quality of

life, housing and neighborhood quality, housing tenure, and utilization of healthcare and long-term services and supports) between PRA and PRAC residents.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320.6 (Controlling Paperwork Burden on the Public, General Information Collection Guidelines). There are no circumstances that require deviation from these guidelines.

- **Requiring respondents to report information to the agency more often than quarterly;**

Respondents will only be involved in a one-time data collection

- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

Respondents are not required to prepare a written response as part of this data collection effort.

- **Requiring respondents to submit more than an original and two copies of any document;**

Respondents are not required to submit more than an original and two copies of any documents as part of this data collection effort.

- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

Respondents are not required to retain records as part of this data collection effort for more than three years.

- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**

This data collection does not involve a statistical survey. Respondents will be selected based on a purposive sample², and the interviews will gather qualitative information to inform HUD on some experiences of property owners and managers, service providers, PHA staff, and residents in Section 811 PRA and PRAC units on the implementation and ongoing operations of the Section 811 program.

- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

This data collection does not involve the use of any statistical data classification has not been reviewed and approved by OMB.

- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use;**

This data collection does not involve the use of a pledge of confidentiality that would deviate from statute or regulation, be inconsistent with disclosure and data security policies, or be considered as impeding the sharing of data as appropriate.

² A purposive sample is a non-random sample that is selected based on characteristics of a population and the objective of the study.

- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

This data collection does not require respondents to submit proprietary trade secrets or confidential information.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside of the Agency

In accordance with 5 CFR 1320.8 (Paperwork Reduction Act of 1995), a Notice of Proposed Information Collection for publication in the Federal register has been prepared to announce the agency's intention to request an OMB review of data collection activities for the evaluation of the Section 811 PRA program. HUD published a 60-Day Notice of Proposed Information Collection in the Federal Register on April 21, 2017. The Docket No. is FR-6003-N-04 and the notice appeared on pages 18768-18769. The notice provides a 60-day period for public comments, and comments are due June 20, 2017. **A copy of the notice is included with this Information Collection Request (ICR) in Appendix E.**

Consultations about the research design, data sources, and study reports occurred during the study's design phase and will continue to take place throughout the study. These consultations ensured the technical soundness of the study and the relevance of its findings. The Section 811 Project Rental Assistance Evaluation Phase II was developed and is being implemented with the assistance of Abt Associates Inc., the study's contractor. Key members of the Abt team include Gretchen Locke, Sara Galantowicz, Dr. Jill Khadduri, Dr. Terry Moore, Melissa Vandawalker, Dr. Austin Nichols, and Dr. Samuel Dastrup. Staff from HUD, the Office of the Assistant Secretary for Planning and Evaluation (ASPE), and the Centers for Medicare and Medicaid Services (CMS) at the Department of Health and Human Services have collaborated on the design of the evaluation with the research team throughout all phases of the study to date.

HUD received one comment for the proposed information collection from an individual who has disabilities and is interested in applying to the Section 811 Project Rental Assistance (PRA) program. HUD responded to the individual to clarify the state of residence and direct this individual to the appropriate state grantee.

9. Explanation of Any Payment or Gift to Respondents

Section 811 PRA and PRAC residents who take part in the one-time surveys will receive a \$40 gift card to thank them for their time and to help defray any costs the respondent may incur to participate in the interview. Because the number of potential resident respondents is small, each response is critical to the study, and the gift cards will help ensure a high data collection response. The incentive amount was determined based on the estimate of respondent burden for participating in the survey, the costs associated with participating the survey, and other studies of comparable populations and burdens.

10. Assurances of Confidentiality Provided to Respondents

HUD has entered into a contract with an independent research team, Abt Associates Inc. to conduct this research effort. HUD and Abt Associates will make every effort to maintain the privacy of respondents, to the extent permitted by law. The subjects of this information collection and the nature of the information to be collected require strict confidentiality procedures. The information requested under this collection is protected and held confidential in accordance with 42 U.S.C. 1306, 20 CFR 401 and 402, 5 U.S.C.552 (Freedom of

Information Act), 5 U.S.C. 552a (Privacy Act of 1974) and OMB Circular No. A-130. A Privacy Impact Assessment was approved by the Department on 06/26/2017. All research staff working on the project have been trained to protect private information and have signed a pledge stating that they will keep all information gathered private to the extent permissible by law.

Resident survey respondents are non-elderly persons with disabilities. Resident surveys will be administered orally by staff trained to work with sensitive health data and individuals with disabilities. The resident survey includes questions on quality of life, self-reported physical and mental health status, family support and composition, housing quality, neighborhood quality, access to supportive services, and transition processes. Resident survey respondents included in the study will be asked for written consent to participate in the survey. For residents who may lack the capacity to provide informed consent, consent will be obtained from his/her legally authorized representative in accordance with relevant state laws. (See Appendix D for Informed Consent for Resident Surveys.) Hard copy written consent forms and any papers that contain participant names or other identifying information will be kept in locked areas and any computer documents containing identifying information will be protected with a password. Surveys will be completed electronically, offline, through an MS Access database on a secure laptop that is encrypted. Survey respondents will only be linked to responses through a de-identified study number and the state where the participant lives. Any identifying information will be removed from the survey. When the interviewers return to the Abt office, they will transfer the survey responses from the laptop to Abt's secure server. Once transferred, the individual survey responses will not leave the contractors' secure server.

For administrative interviews with staff from PRA program participating agencies, interviewers will record staff position, title, and site location. During the interviews, staff will enter interview notes on an encrypted laptop. After the site visit is completed, staff will transfer the interview notes to Abt Associates' common drive, to a folder with access restricted only to staff associated with the project.

All respondents included in the study will be informed that information they provide will be used only for the purpose of this research. Respondents will be notified of this in the consent statement, which respondents will be given information about at the start of the interview. Individuals will not be cited as sources of information in prepared reports.

11. Justification of Sensitive Questions

The administrative interviews with property owners, service providers, and Public Housing Agencies do not contain any sensitive questions.

Some questions for Section 811 PRA and PRAC residents may potentially be sensitive for some respondents. The resident survey will be conducted with individuals living in supportive housing for individuals with physical and/or developmental disabilities and/or mental illness. All PRA and PRAC housing program participants are very or extremely low-income. Survey topics relate to physical and mental health, access to health and supportive services, and possible episodes of homelessness or residing in institutional settings. All survey respondents will be informed that their answers will be private and only be used for the purposes of this study, that they may refuse to answer any questions, and that results will only be reported in the aggregate. Survey administrators will screen all respondents for cognitive ability to complete the survey independently using the proxy screen, obtain participant consent (and consent of legally-authorized representatives if applicable) prior to conducting the survey (Appendix D), and use a proxy to assist in survey completion when necessary.

12. Estimates of Annualized Burden Hours and Costs

Researchers will administer resident surveys for an average of 45 minutes with an additional 30 minutes needed to schedule the call and conduct prescreening questions with the respondent. The total burden for the 480 Section 811 residents is 600 hours. The average burden of interviews for property owners and managers and service providers is one and a half hour, with an additional half hour to schedule the call and compile information needed to complete the interview. The average burden for Public Housing Authorities is 30 minutes with an additional 30 minutes needed to schedule the call and compile information for the interview. The total burden hours for property owners is 48 hours, the total burden hours for service providers is 96 hours, and the total burden hours for Public Housing Authorities is 12 hours. The total respondent burden for these data collection activities is 756 hours.

Exhibit A-5 presents the estimated respondent burden for this information collection. The burden cost estimate is based on the maximum number of respondents to be recruited, the estimated burden, and the estimated annualized cost of respondent burden for each part of data collection. Annualized cost of respondent burden is the product of each type of respondent's annual burden and an average hourly wage rate. The estimated total cost of respondent burden is \$11,865.00.

**Exhibit A-5
Number of Respondents, Estimated Burden, and Estimated Cost of Respondent Burden**

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Property Owner/Managers	24	1	24	2.00	48	\$27.42	\$1,316.16
Service Providers	48	1	48	2.00	96	\$46.41	\$4,455.36
PHA Staff/Managers	12	1	12	1.00	12	\$43.29	\$519.48
Section 811 PRA/PRAC Residents	480	1	480	1.25	600	\$9.29	\$5,574.00
Total	564				756		\$11,865.00

The average hourly wage rate for property owners/managers of properties where Section 811 residents live (\$27.42) is based on the median hourly wage for Property, Real Estate, and Community Association Managers. The average hourly wage for service providers of Section 811 residents (\$46.41) is based on the median hourly wage for Medical and Health Services Managers. The average hourly wage for PHA staff/managers (\$43.29) is based on the median hourly wage for Administrative Services Managers. (Source: Bureau of Labor Statistics, Occupational Employment Statistics, May 2016.)

Respondent	Occupation title	Occupation SOC code	Median hourly wage rate (\$)
Section 811 Property Manager	Property, Real Estate, and Community Association Managers	11-9140	27.42
Service Provider Manager	Medical and Health Services Managers	11-9110	46.41
Public Housing Authority Manager	Administrative Services Managers	11-3010	43.29

Source: Bureau of Labor Statistics, Occupational Employment Statistics (May 2016), https://www.bls.gov/oes/current/oes_stru.htm.

The average hourly wage burden for Section 811 PRA and PRAC residents (\$9.29) is the average expected prevailing minimum wage in the six states where the evaluation is being conducted (California - \$10.50; Delaware - \$8.25; Louisiana - \$7.25 (federal minimum wage); Maryland - \$8.75; Minnesota - \$9.50; Washington - \$11.00). (Source: U.S. Department of Labor, Wage and Hour Division, Minimum Wage Laws in the States, July 2017.)

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

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. Annualized Cost to the Federal Government

The current effort is being carried out under a HUD Contract with Abt Associates. The total amount of this grant, spent over a 36-month period, is \$2,551,488. This data collection activity will be conducted within one year and will use up \$692,874 of this total budget, including \$19,200 in incentive payments to the respondents. Incentive payments of \$40 are planned for 480 Section 811 PRA and PRAC residents.

15. Explanation for Program Changes or Adjustments

This submission to OMB is a substantial revision of currently approved collection (OMB Approval Number: 2528-0309). There are program changes or adjustments to annual burden. The data collection for the second phase of the evaluation will address the impact and the cost of the 811 PRA program, as mandated by the Melville Act. It includes a survey of residents and a larger set of respondents from agencies implementing the program. As a result, this new submission has a larger set of respondents and burden hours compared to the original approved collection (564 responses and 756 hours in this submission versus 79 responses and 330 hours in the currently approved collection).

16. Plans for Tabulation and Publication and Time Schedule

The data collected for the *Section 811 Project Rental Assistance Evaluation Phase II* will be analyzed, tabulated, and reported to HUD by the evaluation contractor, Abt Associates. An overview of the project schedule is presented in Exhibit A-6.

Exhibit A-6 Project Schedule

Activity	Focus	Schedule
Data Collection	Administrative Interviews and Resident Surveys	September 2017 – December 2017
Interim Report	Data Collection, Descriptive Analysis of Program Outputs, Preliminary Outcomes for PRA Grantees	October 2017
Analysis	Interview and Survey Data	January 2018 – June 2018
Final Report	All Data Collection and Analysis	October 2018

Data collection for the resident surveys and administrative interviews is expected to start in September 2017, pending approval of this information request. The study team is planning a six-month field data collection between September and December 2017. Analysis of the resident survey and administrative interview data will take place January 2018 – June 2018. An interim report in October 2017 will present a brief update on data collection activities and a descriptive analysis of PRA program outputs and preliminary outcomes for all 28 PRA grantees. A final report that will incorporate the final results of all aspects of the study is due to HUD in October 2018.

The interview data from property owners and managers, service providers, and PHA staff, and survey data from Section 811 PRA residents will be analyzed for the implementation study. Analysis of the interview data will begin after each site visit is completed. Qualitative research software, NVivo, will be used to code, sort and analyze interview findings.

Survey data from Section 811 PRA and PRAC residents will be analyzed as part of the impact study. The impact analysis will compare various short-term outcomes and characteristics of interest – quality of life, housing and neighborhood quality, housing tenure, and utilization of healthcare and long-term services and supports.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

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

18. Exceptions to Certification for Paperwork Reduction Act Submissions

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