Supporting Statement for Paperwork Reduction Act
FAMILY SELF-SUFFICIENCY PROGRAM EVALUATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information

A.1. Circumstances Necessitating Data Collection

This request for OMB Clearance is related to the ongoing data collection activities for the Family Self-Sufficiency (FSS) Evaluation. This study was authorized under the Consolidated Appropriations Act, 2010, Pub. Law 111-117, 123 Stat. 3034, which was approved on Dec. 16, 2009. This evaluation is being conducted by MDRC and its subcontractors, on behalf of the US Department of Housing and Urban Development (HUD). The data collection activities included in this request focus on the study's implementation research and cost study components and the tools required to collect the information from study participants and program operators. Later sections of this document describe the type of data collection anticipated as part of these data collection activities.

A.1.1 Background and Policy Context

The linkage of housing assistance to economic opportunities has long been an important component of US housing policy. Indeed, for many years, policymakers and analysts have argued that low-income, working-age people who receive a rent subsidy from the government should strive for some degree of economic self-sufficiency, and that housing subsidy systems should play a more active role in supporting these efforts, such as through the FSS program.

FSS goals, features, and participation

The FSS program, created in 1990 by Section 554 of the National Affordable Housing Act,[1] is administered by state and local public housing agencies. HUD provides funding for FSS case coordinators to manage the program and ensure that participants are linked with appropriate services, and it also funds the escrow accounts. HUD does not fund services; public housing authorities (PHAs) must rely on their own or other resources available in the community. In March 2011, HUD announced that a total of $54 million would be made available for FSS in the Housing Choice Voucher (HCV) program. The funds were allocated to roughly 700 PHAs for an average grant of approximately $90,000.

Tenants' participation in FSS is voluntary. While PHAs may screen participants for interest or motivation, they are barred from screening for education, job history, marital status, or credit

[1] A brief description of HUD's prior efforts at FSS-like programs is found in Rohe and Kleit (1999).

rating. Tenants who elect to participate execute a 5-year self-sufficiency contract that specifies their obligations and the services that will be provided over the course of the contract (HUD, 2011).

Central to the FSS program model has been the inclusion of a rent escrow provision. Rent increases that, under HUD rent rules, would normally follow a rise in earned income are instead diverted into an interest-bearing, PHA-administered escrow savings account, the proceeds of which the family can access after completing their contract, and if no family members are receiving cash public assistance (such as Temporary Assistance for Needy Families, or TANF). After families successfully complete their contracts, they receive the full value of their accumulated savings without restriction on how the money can be used. However, participants may qualify for interim disbursements to cover expenses that can help them meet the terms of their contracts, such as for paying for education or training courses. FSS introduced this feature both as an incentive for households to increase work and earnings, and as a long-term savings vehicle to help families build their financial assets. These asset-building provisions appeared in early research on FSS, to play an important role in motivating families' continued participation in FSS (Rohe and Kleit, 1999: 358).

The escrow feature is believed to be critical to the potential success of FSS because it helps to address the HUD rule requiring families to pay 30 percent of their adjusted income in rent. Some experts view this rent rule as imposing an implicit tax that may severely "dampen a parent's enthusiasm for work" (Newman and Harkness, 2002: 24).

The second component of the FSS program is case management. HUD funds the PHAs to hire coordinators, who are expected to work with program participants to connect them to services meant to address their barriers to employment. Past research[2] suggests the low-income individuals face difficulties in securing and advancing employment including lack of diploma or certification, poor mental and physical health, low English language fluency, drug addiction, criminal records, and lack of "soft skills" including interview protocol and effective communication with superiors. MDRC's experiences in the New York City Work Rewards demonstration, (discussed below) suggest, additionally, that a high proportion of single mothers (over 80 percent of the sample in the Work Rewards) enrolled in FSS.[3] This population faces additional barriers to employment that include access to high-quality childcare and transportation options. FSS coordinators are expected to tailor referral services provided to the particular needs of the client. The assumptions made about and understanding of these barriers to employment on the part of FSS program staff as well as the overall approach the PHA takes toward the self-sufficiency contract may be crucial factors in determining whether FSS is effective in helping participants advance and achieve self-sufficiency.

Around the time the study was launched, roughly 77,000 households participated in FSS nationwide, with the majority (over 80 percent according to HUD) being HCV recipients rather than public housing residents. FSS households make up a very small share of the families

[2] See for example MDRC's Chicago Employment Retention and Advancement Project (http://www.mdrc.org/publications/441/full.pdf)

[3] Verma, Tessler, Miller, Riccio, Rucks, and Yang (2012), Nunez, Verma and Yang (2015)

receiving various forms of HUD assistance.[4] Recent HUD funded studies of FSS participation reveal that about 5 percent of voucher program users were enrolled in FSS (de Silva et al., 2011: 13; Ficke and Piesse, 2004: xiii).

A.1.2 Overview of the FSS Evaluation

MDRC was selected by HUD to conduct a comprehensive study of the FSS program. This section provides a brief overview of the comprehensive evaluation design, structured around three research components: an impact analysis, an implementation and participation analysis, and a benefit-cost analysis. The overarching goal of the evaluation is to test the effectiveness of the FSS program, the main self-sufficiency intervention that program participants will be exposed to.

The study is designed as a two-group Randomized Controlled Trial (RCT) involving 2,551 households across 18 public housing agencies (PHAs or sites). Participants were randomly assigned to one of two groups:

- **FSS group**. These individuals have access to the core elements of the FSS program – case management as well as rent escrow provisions.

- **Control group**. These individuals will not be enrolled in FSS and will not have access to FSS case management or escrow.

When properly implemented, random assignment helps eliminate systematic differences between the program and control groups prior to the start of the program and any subsequent differences in outcomes – for example, differences in employment or earnings and differences in family income and poverty—can be attributed to the program with confidence.

The research is positioned to speak to the following types of research questions:

1. Does the FSS program improve self-sufficiency outcomes for program participants?

2. Do the effects vary across types of people and places?

3. How does variation in the implementation of the interventions affect participants' experiences and the interventions' success?

4. Does the intervention produce positive benefit-cost results?

2. How, by Whom, and for What Purpose Are Data to be Used

How will the information be used?

The impact findings from the study will be used to inform the Federal government, PHAs and other stake-holders about the effectiveness of FSS in helping HCV holders secure and

[4] HUD data indicate that there are currently over 3.3 million units of public and assisted housing (Schwartz, 2010; US Department of Housing and Urban Development, 2008).

maintain employment and achieve self-sufficiency. It will also inform these audiences about best practices in implementing a program like FSS.

As a study commissioned by HUD, the Department will use the information from the implementation research to understand what might be behind any impacts of the FSS program or why impacts might vary across sites. As the first national evaluation to assess the effects of FSS, these data will be important for HUD to begin answering questions about whether FSS makes a difference and helps achieve HUD's self-sufficiency goals and also *how* it achieves this. The comprehensive study will also speak to the program's impacts in multiple domains – for example, housing assistance; self-sufficiency; material hardship, and financial wellbeing.

In addition, PHAs will also use the data to understand how their programs work and to target resources in effective ways. Over 700 PHAs operate FSS, and the findings from the evaluation will be critical to their own implementation decisions. Ultimately, these data will benefit the public and social policy community, researchers, policy analysts, and policy makers who are interested in developing policy initiatives to promote self-sufficiency and reduce poverty among housing voucher recipients in a wide range of program areas. This project offers the first opportunity to obtain reliable measures of the effects of the FSS program at a national scale. The long-term indirect benefits of this research are therefore likely to be substantial.

Who Will Collect the Information?

MDRC research staff, along with consultants, will conduct the data collection described in this package. Staff conducting these interviews are familiar with the programs in the 18 sites. The research team will visit nine FSS programs in person, where they will interview supervisors, case managers, and participants, and they will interview supervisors from the other nine programs by phone.

Data to be collected

Focusing on the scope of this package, this section provides an overview of the data collection tools (four interview protocols and one set of pre-interview tables) submitted for clearance:

- Protocol 1_PHA Staff Interviews_On-Site_Supervisors
- Protocol 2_PHA Staff Interviews_Telephone_Supervisors
- Protocol 3_PHA Staff Interviews_On-Site_Case Managers
- Protocol 4_Study Participant Interviews
- Protocol 5_PHA Staff Interviews_Pre-Interview Tables

FSS staff and participant experiences will be documented as part of this round of implementation research. During this round, MDRC will conduct structured in-depth interviews with approximately 36 staff members (3 PHA staff at each of nine PHAs in person and one PHA staff at each of nine PHAs by phone) and up to 90 participants (10 at each of nine sites) to learn about their experiences with and perspectives on the FSS program. The proposed interview protocols are attached with this submission.

In developing the pre-interview table for staff completion and the interview protocols, we attempted to balance the need to capture a rich set of data against placing undue burden on the respondents, excluding items that—while potentially interesting—are not critical to understanding the implementation of the FSS program. Another goal was to keep the time allotted for each interview to a reasonable duration, thereby limiting respondent burden. This section provides a brief overview of the pre-interview table and the interview protocols.

Protocol 5 (Pre-interview Staff/PCC Tables) is a template for staff to complete prior to the research team interview. It asks for basic information about program size, staffing levels and responsibilities, and the site's PCC. The intention is to allow supervisors to complete this table on their own time, which will save time during the interview.

The following broad topics will be included in the supervisor and case manager interview protocols:

- General Program and Staffing (supervisors only)
    - Policy updates
- Program Approach
- Case Management
    - Graduation
    - Escrow
- FSS Goal Setting
- PCC and Service Referral Network
- Program Costs -

The following broad topics will be included in the participant interview protocol:

- Motivation for Joining FSS
- Goal-Setting and Progress toward Goals
- Relationship with Case Manager
- Services Used
- Escrow
- Overall Assessment and Recommendations

Informed Consent

Verbal consent to participate in the interview will be obtained from staff before starting the interview. Study participants completed a participation agreement when they enrolled in the study, providing their informed consent to participate in the research study and related data collection activities. The original participation agreement allows for the collection and retention of data on study participants for up to 10 years after random assignment. Verbal consent to participate in the interview will also be obtained from participants before starting the interview. A copy of the script read out loud to each respondent, asking for consent to be interviewed, is included in the introductory script in each protocol.

3. Use of Information Technology for Data Collection to Reduce Respondent Burden

Wherever possible, advanced technology will be used in data collection efforts to reduce burden on study participants and on-site staff. While program implementation data collection relies on evaluation of staff efforts on-site, we have sought, wherever possible, to minimize overlap between questions we include in implementation research protocols and information that is available through PHA data and other administrative records.

4. Efforts to Identify Duplication

The information collection will not duplicate information that is already available. Where possible, the evaluation uses available data sources, such as Unemployment Insurance (UI) wage records and housing data. The proposed data collection will collect data that is not available routinely or systematically in program records.

5. Burden on Small Business

We do not anticipate that this study will burden small businesses.

6. Consequence If Data Collection is Not Conducted

This evaluation represents an important opportunity for the Federal Government to add to the body of knowledge about the implementation and impacts of a key employment-oriented program for HCV recipients. With the exception of the Work Rewards demonstration, New York City's FSS study, there is no evidence about the effectiveness of the programs around the country.

If the implementation research is not conducted, analyzed, reported, and disseminated, Federal program or policy activities will not be informed about what is likely to be behind the variety of outcomes central to the FSS intervention. Limiting the evaluation only to the impact analysis will limit the ability to interpret impacts, which in turn would limit possibilities for replication and expansion of best practices in the implementation of FSS.

7. Special Data Collection Circumstances

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320 (Controlling Paperwork Burdens on the Public). As noted, below, there are no special circumstances that require deviation from these guidelines.

* requiring respondents to report information to the agency more than quarterly; **Not applicable**
* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; **Not applicable**

* requiring respondents to submit more than an original and two copies of any document; **Not applicable**
* requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years; **Not applicable**
* in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study; **Not applicable**
* requiring the use of a statistical data classification that has not been reviewed and approved by OMB; **Not applicable**
* 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; or **Not applicable**
* 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. **Not applicable**

8. Form 5 CFR 1320.8(d) and Consultations Prior to OMB Submission

a. Federal Register Notice and Comments

HUD's notice in the Federal Register, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB, appeared in Vol. 82, No.134, Date July 14, 2017. No public comments were received.

b. Consultations Outside of the Agency

All data collection instruments included in this package have gone through extensive review by expert consultants, HUD staff, and members of the research team. During study design, we have sought the input of nationally recognized experts on Public Housing and Section 8 housing assistance, including John Goering and Ingrid Gould-Ellen. We continue to consult with outside experts as we move toward project launch.

9. Justification for Respondent Payments

During this stage of the evaluation one type of payment to respondents is planned: a $40 payment will be distributed to participants (not staff) upon completion of the interview. Justification for this payment is provided below.

Payment upon completion of the interview. Payment upon interview completion is intended as a token of appreciation. As documented in the literature, this token of appreciation is likely to improve show rates for the interviews by decreasing the number of refusals, enhancing respondent retention, and providing a gesture of goodwill to acknowledge respondent burdens. This technique is proposed in addition to many of the techniques suggested by OMB to improve response rates that have been incorporated into our data collection effort and are described in Section B3 (see Supporting Statement B), because our experience has shown that small monetary amounts are useful when fielding data collection instruments with low-income and/or hard-to-reach populations as part of a complex study design. In a seminal meta-analysis, Singer, et al.

(1999) found that incentives in face-to-face and telephone surveys were effective at increasing response rates, with a one dollar increase in incentive resulting in approximately a one-third of a percentage point increase in response rate, on average. They found some evidence that incentives were useful in boosting response rates among underrepresented demographic groups, such as low-income and non-white individuals.[5] This is a significant consideration for this study. Another important consideration is the burden posed by this data collection, which will take on average 90 minutes of the participant's time for the in-person interview, including travel to and from the interview location.

10. Assurances of Privacy

Every effort will be made to maintain the privacy of interviewees, to the extent permitted by law. Please see consent script that will be provided to all respondents, which is included in the front of each protocol. In all circumstances, MDRC will protect the confidentiality of the data it collects through its regular high-security safeguards and practices. All interviewees will be informed that information they provide will be used only for the purpose of this research. Individuals will not be cited as sources of information in prepared reports. 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. All 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. HUD FSS has a Privacy Threshold Analysis (PTA) dated November 20, 2017. The Research Design and Data Collection and Analysis Plan prepared for this study provides additional information on how evaluation data will be protected. It is available on request.

11. Questions of a Sensitive Nature

The qualitative data collection will focus on staff and participant experiences with the FSS program. Respondents will be informed prior to their interviews with MDRC staff that they may refuse to answer any question, that their responses will be used in the aggregate (and that individuals will not be identified by name), and – for participants – that their responses will not have any effect on any services or benefits they or their family members receive.

12. Estimates of the Hour Burden of Data Collection to Respondents

The hour burden for the data collection for participants is outlined in Table 1 below. The estimates included below are based on experience with previous random assignment studies involving similar populations and data collection instruments.

[5] Berlin, M., L. Mohadjer and J. Waksberg (1992). An experiment in monetary incentives. *Proceedings of the Survey Research Section of the American Statistical Association*, 393-398; de Heer, W. and E. de Leeuw. "Trends in household survey non-response: A longitudinal and international comparison." In *Survey Non-response*, edited by R. M. Groves, D. A. Dillman, J. L. Eltinge, and R. J. A. Little. New York: John Wiley, 2002, pp.41-54; Singer, E. and Kulka, R. Studies of Welfare Populations: Data Collection and Research Issues, Panel on Data and Methods for Measuring the Effects of Changes in Social Welfare Programs. Ploeg, Robert A. Moffitt, and Constance F. Citro, Editors. National Academies Press, Washington, DC, 2000, pp. 105-128.

PHA and Partner Staff	90
Individuals receiving subsidized housing and enrolled in the FSS program (treatment group):	90

Table 1

Information Collection	Number of respondents	Frequency of response	Responses per annum	Burden hour per response	Annual burden hours	Hourly cost per response	Annual cost
Study Participant Interviews [Protocol 4_Study Participant Interviews]	90.00	1.00	90.00	1.50	135.00	[1]$7.25	$978.75
PHA Staff Interviews (on-site) [Protocol 1_PHA Staff Interviews_On-Site_Supervisors Protocol 3_PHA Staff Interviews_On-Site_Case Managers]	27.00	1.00	27.00	1.50	40.50	[2]$25.92	$1049.76
PHA Staff Interviews (telephone) [Protocol 2_PHA Staff Interviews_Telephone_Supervisors]	9.00	1.00	9.00	1.50	13.50	[2]$25.92	$349.92
FSS PHA Staff Interviews_Pre Interview [Protocol 5_PHA Staff Interviews_Pre-Interview Tables]	18.00	1.00	18.00	0.50	9.00	$25.92	$233.28
TOTAL	144.00				198.00		$2,611.71

[1] Households participating in the Family Self-Sufficiency Demonstration will range widely in employment position and earnings. We have estimated the hourly wage at the expected prevailing minimum wage, which is $7.25 per hour. While we expect about 50 percent of the participants to be employed at the time of study entry (based on a report by the Center on Budget and Policy Priorities, wherein some 55 percent of non-elderly, non-disabled households receiving voucher assistance reported earned income in 2010. (*http://www.cbpp.org/cms/?fa=view&id=3634)*), the calculation above assumes an up to amount if all participants were employed.

[2] For program staff participating in interviews, the **$25.91** estimate uses the median hourly wages of selected occupations (classified by Standard Occupational Classification (SOC) codes) and was sourced from the Occupational Employment Statistics from the U.S. Department of Labor's Bureau of Labor Statistics. Potentially relevant occupations and their median hourly wages are:

Occupation	SOC Code	Median hourly wage rate
Community and Social Service Specialist	21-1099	$20.73
Social/community Service Manager	11-9151	$31.10
Source: Occupational Employment Statistics, accessed online October 16, 2017 at *http://www.bls.gov/oes/current/oes_stru.htm*.		

13. Other Cost Burden to Respondents

The proposed data collection will not require the respondents to purchase equipment or services. Therefore, there are no additional costs to respondents.

14. Annualized Cost to the Government.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response[7]	Annual Cost
Study Participant Interviews and/or Focus Groups	90.00 [6]	1.00	90.00	1.50	135.00	$133.56	$18,030.06
PHA Staff Interviews (on-site)	27.00	1.00	27.00	1.50	40.50	$133.56	$5,409.18
PHA Staff Interviews (telephone)	9.00	1.00	9.00	1.50	13.50	$133.56	$1,803.06
TOTAL	126.00				189.00		$25,242,30.00
Estimated Travel [8]							$24,210.00
GRAND TOTAL							$49,452.84
6 Based on interviews with individual participants; if conducting focus groups, total cost will be less.							
7 Hourly rate is an average of the loaded rate for the labor category of staff expected to be involved in this data collection effort based on the rates established for the FSS project.							
8 Based on an assumption of visits to 9 sites by 2 people at an average cost of $1345 per person							

The total cost to the federal government for this phase of the study, including but not limited to the data collection activities discussed in this submission is. $49,452.30

15. Reasons for Any Program Changes or Adjustments

This submission is a revision request for approval. This is the final round of data collection for the study which reflects an update to burden hours.

16. Tabulation, Analysis, and Publication Plans and Schedule

As detailed in the previous OMB submission, to determine the effectiveness of the targeted programs, MDRC will collect four categories of data: 1) baseline data, 2) program implementation, services, and process data (some of which will support the cost effectiveness study), 3) administrative records, and 4) surveys of study sample members.

As shown in Table 2 below, the evaluation data will be analyzed from 2014 to 2018 and MDRC intends to produce the following deliverables, drawing on the various data sources.

Table 2: Analysis and Publication Schedule

Activity	**Schedule**
Analysis	01/01/2016- 07/31/2018
1st Report (internal memo) Draft Final	 04/01/2015 05/01/2015
2nd Report Draft Final	 9/12/2017 12/19/17
3rd Report (internal update) Draft Final	 11/15/2017 01/15/2018
Final Report	08/15/2018
Data Files and Documentation	08/15/2018

17. Reasons for Not Displaying OMB Approval Expiration Date

The expiration date for OMB approval will be displayed on all forms completed as part of the data collection.

18. Exceptions to Certification Statement

No exceptions are necessary for this information collection.