

Supporting Statement for Paperwork Reduction Act Submission
Pre-Purchase Homeownership Education and Counseling Demonstration and Impact Evaluation
OMB #2528-0293

Part A. Justification

A. Explain the circumstances that make the collection of information necessary.

This research is conducted under the authority of the Secretary of the U.S. Department of Housing and Urban Development to undertake programs of research, studies, testing and demonstration related to HUD's mission and programs (12 USC 1701z-1 et seq.).

The Department of Housing and Urban Development (HUD) seeks to understand the impact of homebuyer education and counseling on a range of outcomes for low-, moderate-, and middle-income first-time homebuyers. The Pre-Purchase Homeownership Counseling Demonstration and Impact Evaluation examines the impact of different types of homebuyer education and counseling on homeowner outcomes and loan performance for prospective first-time homebuyers with incomes below 120 percent of the area median. This evaluation measures the impact of homebuyer education and counseling interventions through a randomized experimental design. The study examines impacts on a series of outcomes organized into three outcome domains: (1) preparedness and search, (2) financial capability, and (3) sustainable homeownership. The study also examines how the mode of service delivery—in-person or remote—influences the effectiveness of the intervention, and how impacts vary for particular subgroups of the study sample.

The current study represents an important effort to measure the impact of homebuyer education and counseling using experimental evaluation methods. Whereas many of the previous studies have been limited by small sample sizes and non-experimental designs, this evaluation recruited a large sample for an experimental impact evaluation in which individuals were randomly assigned to receive homebuyer education and counseling services or not.

The study enrolled 5,854 study participants across 28 study sites. The study began by implementing a pilot period in three sites (Los Angeles, Miami, and Phoenix) for eight weeks in fall 2013. In January 2014, full study enrollment began across all 28 sites. Study participant enrollment ended in January 2016.

OMB reviewed the full set of materials for the enrollment and interim data collection stages of the study under two previous submissions (Control #2528-0293). This submission contains renewals for the continuation of existing data collection activities and a new data collection activity for the final stage of follow-up. Each of these activities is described below.

1. New Follow-up Data Collection:

Long-Term Follow-Up Survey: The Long-Term Follow-Up Survey will be administered approximately 48 to 60 months following random assignment by interviewers using a telephone with field follow-up methodology. Sample will be released in clusters according to when the study participant completed the baseline survey. Two weeks prior to the release of new sample, Abt will send sample members a tracking letter. This letter describes the study, alerts the study participants that interviewers will attempt to reach them, encourages their participation, and provides a toll-free study number for them to call with questions. Abt interviewers will first attempt to reach each study participant by telephone. Cases will be worked by telephone until all leads are exhausted. Cases not completed in the phone center will be sent to the field interviewers and attempted in-person.

2. Continuation of Data Collection Activities:

Updated tracking information for study participants: During the baseline and interim data collection period, the Abt team developed a robust tracking system that utilizes both passive and active measures and involves reaching out to study participants regularly. The tracking plan builds upon the study's existing data system and supplements it with data obtained through passive searches every six months of proprietary databases—including the National Change of Address database. These sources are supplemented by mailed requests for the study participants to review and return a form that includes contact information for the participant, as well as up to three people who always know how to reach the participant. This robust tracking plan helps the study team keep the participant contact information accurate. These efforts began during the study enrollment period and will continue until the study participant completes the Long-Term Follow-Up Survey.

Collection of consent from co-borrowers of study participants: For study participants who originate a loan with one or more co-borrowers, the collection of consent from study participants' co-borrowers' is necessary to allow the study to collect data related to the origination and servicing attributes of their mortgage loans. The origination and servicing data is the primary source of data for several outcome measures.

During the Long-Term Follow-Up Survey, study interviewers will ask the study participant to confirm whether they purchased a home with one or more co-borrowers. If any co-borrower has not yet provided consent to the study team, the interviewer will ask the study participant whether the co-borrower is available, and attempt to collect co-borrower consent verbally or arrange a time to callback to collect the consent.

Loan origination and performance data: Study participants' loan information and performance data will continue to be requested at six-month intervals throughout the study's final follow-up period from participating lenders and the Federal Housing Administration. This data provides the study team detailed information on the timing of a home purchase, underwriting characteristics, monthly housing costs, and mortgage terms and conditions for any study participant who purchases a home through a study participating lenders.

Credit Bureau Data: The credit bureau data contain study participants' credit scores and selected credit file attributes. The credit bureau data collected during the study's final follow-up period will contain the same measures that the study team is currently collecting. This data includes information about housing outcomes (e.g., housing debt, monthly housing debt payment), loan performance (e.g., mortgage delinquency, bankruptcy, foreclosure), and other key outcomes for the study's impact analyses.

B. Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Project Overview

The study design is a randomized experiment. Enrolled study participants were assigned to one of three groups: remote housing counseling (online education + telephone counseling), a choice group with the option of completing services remotely or in-person (online education + telephone counseling or classroom-based education + in-person counseling)¹, or a control group that does not have access to these housing counseling services. Implementation of this study in the field required that the study team coordinate with both lenders and HUD-approved housing counseling agencies:

- **Lenders:** The study team partnered with three national lenders for the implementation of this study. The participating lenders were chosen purposively, based on their volume of loan originations and willingness to partner for this study. Study participants were recruited through the lenders' centralized, telephone-based customer service teams. The telephone customer service teams with each lender introduced the study to customers, referring interested customers to the study team.
- **HUD-Approved Housing Counseling Agencies:** The study team referred study participants in each treatment group to HUD-approved housing counseling agencies to receive housing education and counseling services. The housing counseling agencies include one national remote housing counseling provider and local affiliates of two national in-person housing counseling intermediaries. The study team selected eHome America and ClearPoint (which was formerly named CredAbility) as the provider of remote housing counseling for the evaluation. For in-person housing counseling, the study team worked with NeighborWorks America and the National Council of La Raza (NCLR) to recruit local affiliate organizations to provide in-person housing counseling in each jurisdiction. However, based on NeighborWorks and NCLR's coverage, the study team also recruited other HUD-approved housing counseling agencies that fit the study's needs in each jurisdiction.

The study team is responsible for all other study activities—as well as for monitoring and coordinating the activities of the lenders and housing counseling agencies.

The recruitment and enrollment process included several steps. Following lender intake and referral, the study team conducted the eligibility assessment, consent process, baseline survey, and random assignment. While lenders applied screening criteria to determine whether to offer participation in the study, the eligibility assessment confirmed that the customer met all study eligibility requirements.

This submission requests OMB approval for four data collection activities – one new data collection activity and three activities that are a continuation from the study's previous OMB submission (Control #2528-0293).

1. Collection of study participants' responses to a Long-Term Follow-up Survey 48-60 months following enrollment;
2. Continued collection of updated contact information from study participants;

¹ In September 2014, the study team in consultation with HUD replaced the in-person treatment group with a choice treatment group.

3. Continued collection of co-borrower consent; and
4. Continued collection of administrative data on study participants' loan origination, mortgage performance, and credit bureau information.

Purpose of Each Data Collection Activity

The purpose of each data collection activity is described below.

1. **Collection of study participants' final survey responses (New Data Collection Activity)**

The Long-Term Follow-Up Survey will be used to collect follow-up information on study participants that will be useful for several parts of the study. The impact analyses will rely on the Long-Term Follow-Up Survey for information on covariates, subgroups, and measures of outcomes. The Long-Term Follow-Up Survey is provided in Appendix A. The advance letter that will be provided two weeks prior to administering the survey is provided in Appendix B.

2. **Collection of updated contact information from study participants (Continuation of Data Collection Activity)**

Every six months, the study team mails study participants a letter asking for updated contact information so that we can reach them for data collection activities conducted during the study's follow-up period. If their contact information has changed since they agreed to participate in the study, study participants simply need to update the form and mail it back. The study participant tracking letter was approved as part of the previous submission (Control #2528-0293).

3. **Collection of co-borrower consent (Continuation of Data Collection Activity)**

The collection of co-borrower consent is necessary to collect information on the origination and servicing attributes of study participants' loans. Consent from all co-borrowers is required for the study team to receive data from any of the study's participating lenders.

The data from the Short-Term Follow-up Survey indicated that among the 59.3 percent of study participants who purchased a home, about one-fourth (25.6 percent) planned to have a co-borrower at baseline, and a similar share of purchasers actually purchased a home with a co-borrower at follow-up (22.5 percent). For each participant, the use of a co-borrower and who that may be can change over time. The Baseline Survey and Short-Term Survey asked study participants to identify any co-borrowers that they expect to participate in the home purchase. Collection of co-borrower consent was approved as part of the previous submission (Control #2528-0293).

4. **Collection of administrative data on loan origination, loan performance data, and credit bureau information (Continuation of Data Collection Activity)**

Data collected from lenders and the Federal Housing Administration on study participants' loan origination and mortgage performance documents detailed information on the timing of a home purchase, purchase price and down payment, monthly housing costs, and mortgage terms and conditions. The credit bureau data contain study participants' credit scores and selected credit file attributes. This data includes information about housing outcomes (e.g., housing debt, monthly

housing debt payment), loan performance (e.g., mortgage delinquency, bankruptcy, foreclosure), and other key outcomes for the study’s impact analyses. Abt has established a purchase agreement with the credit bureau to cover data pulls months. These pulls are timed to match the collection of lender/FHA data, as well as to ensure timely collection of data for the final analyses. This information is critical to the analysis of impacts for this study. The loan origination and performance data collected from lenders along with collection of study participants’ credit bureau data were approved as part of the previous submission (Control #2528-0293).

Who Will Use this Information?

The primary beneficiary of the planned data collection will be HUD, who will use the information from the study to understand the impact of homebuyer education and counseling on a range of outcomes for low-, moderate-, and middle-income, first-time homebuyers. The findings of the impact analyses will be published by HUD and are relevant to a broader set of policymakers, financial institutions, counseling agencies, and researchers.

To date, HUD has published two reports as a result of the study’s efforts:

- *The First-Time Homebuyer Education and Counseling Demonstration: Baseline Report*
- *The First-Time Homebuyer Education and Counseling Demonstration: Early Insights*

Additionally, HUD has two reports forthcoming.

Instrument Item-by-Item Justification Chart

Exhibit A-1 describes the target respondents, content, and reason for inclusion for each data collection activity. Copies of the data collection instruments are provided as Appendices.

Exhibit A-1. Item-by-Item Justification of Data Collection Instruments

Data Collection Activity	Data Collection Instrument(s)	Respondents, Content, and Reason for Inclusion
Study Participant Responses to Long-Term Follow-Up Survey	Long-Term Follow-Up Survey (Appendix A)	<p>Respondents: 5,854 study participants across 28 jurisdictions</p> <p>Content:</p> <ul style="list-style-type: none"> • Study participants' housing status; • Financial capability and mortgage knowledge • Home and Mortgage Search Process • Home and Mortgage Features • Mortgage Performance • Monthly Housing Costs • Homebuyer Education and Counseling • Demographics • Contact Information <p>Reason: The Long-Term Follow-Up Survey will be used to collect follow-up information (48-60 months following enrollment) on study participants. The impact analyses will rely on the survey for information on covariates, subgroups, and measures of outcomes.</p>

	<p>Study Participant Tracking Letters (Submitted and approved in prior submission)</p>	<p>Respondents: 5,854 study participants across 28 jurisdictions</p> <p>Content:</p> <ul style="list-style-type: none"> • Updated contact information for the study participant and a person outside of the participant’s household who would know how to locate the participant. <p>Reason: The collection of this information is necessary to confirm that the study team’s contact information is accurate and we will be able to reach him or her for the study’s follow-up data collection activities.</p>
<p>Co-borrower Consent</p>	<p>Verbal Co-borrower Script (Submitted and approved in prior submission)</p>	<p>Respondents: Any person who is a co-borrower on a study participant’s home loan. <i>(The number of respondents for this activity is undetermined at this time. However, the study team estimates the number of co-borrowers to be approximately 1,000 respondents.)</i></p> <p>Content:</p> <ul style="list-style-type: none"> • Co-borrower’s first and last name; • Co-borrower’s verbal agreement to participate; and, • Co-borrower’s date of birth. <p>Reason: To receive information on study participants’ loan originations and performance data, lenders need consent from all borrowers on the home loan.</p>
<p>Collection of Loan Origination and Performance Data</p>	<p>Loan Origination and Performance Data from Lenders (Submitted and approved in prior submission)</p>	<p>Respondents: Lenders’ staff that provide the study team data on loan originations and mortgage performance for study participants’ home loans.</p> <p>Content:</p> <ul style="list-style-type: none"> • Loan number; • Date of closing; • Purchase price; • Monthly income; • Back end ratio; • Front end ratio; • Down payment; • Initial LTV; • Mortgage term; • Mortgage type; • Interest rate; • Closing costs and fees; • Over 30 days delinquent; • Over 90 days delinquent; • Prepayment; • Foreclosure; • Bankruptcy; and • Updated mortgage balance <p>Reason: Data collected from lenders and the Federal Housing Administration on study participants loan origination and mortgage performance will document detailed information on the timing of a home purchase,</p>

		purchase price and down payment, monthly housing costs, and mortgage terms and conditions.
Collection of Credit Bureau Data	Study Participants' Credit Bureau Data from a Credit Bureau (Submitted and approved in prior submission)	<p>Respondents: Credit Bureau staff</p> <p>Content: Several hundred variables are provided to the study team, including information on:</p> <ul style="list-style-type: none"> • Housing debt; • Monthly housing debt payment; • Mortgage delinquency; • Bankruptcy; and, • Foreclosure <p>Reason: Data collected from the credit bureau will document study participants' credit scores and selected credit file attributes. This data includes information about housing outcomes, loan performance, and other key outcomes for the study's impact analyses.</p>

C. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Improved information technology is used in this evaluation in three distinct ways:

- To maintain data in a single location on all eligibility assessments, random assignments, loan pre-qualifications and housing counseling services received;
- To assist the ongoing sample tracking and locating efforts; and
- To facilitate collection of the survey data in standardized and accurate ways that also ensures the protection of the confidentiality of sensitive data.

The two main technologies that are used are the Random Assignment and Service Tracking (RAST) system which was created for the study and Computer Assisted Telephone Interviewing (CATI) technology.

Random Assignment and Service Tracking System (RAST)

The study generates a substantial amount of data, including eligibility assessments of potential study participants, random assignment records, and information provided by lenders and housing counseling agencies. The RAST system was developed to manage the various sources of data. The database securely maintains information from lenders, housing counseling agencies, and study participants throughout the life of the study.

The RAST system also supports the tracking of study participants over the course of the study to ensure a high response rate for future surveys. Throughout the study, the study team passively tracks study participants through the U.S. Postal Service Change of Address database. Also, every six months, the study team mail study participants a letter asking for updated contact information. If their contact information has changed since they agreed to participate in the study, study participants simply need to update the form and mail it back.

The RAST system securely stores all tracking updates we collect, and links them to the participants. Through active and passive tracking, the study team is able to monitor both counseling service completion and change in location of study participants.

Computer-Assisted Telephone Interviewing/Computer-Assisted Personal Interviewing (CATI/CAPI)

The study team will use CATI and CAPI technology to administer the Long-Term Follow-Up Survey. The use of CATI and CAPI reduces respondent burden, as interviewers can proceed more quickly and accurately through the survey instruments, minimizing the interview length and the need for subsequent call-back. Computer programs enable respondents to avoid inappropriate and non-applicable questions. For example, respondents in the control group, who were not offered homebuyer education and counseling, will be routed past questions only relevant to those who were offered homebuyer education and counseling. CATI and CAPI also improves data quality through more uniform administration of the survey questions, more accurate implementation of the skip patterns, and immediate application of range checks, edit checks, and consistency checks of item-by-item responses.

D. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

During the study's design phase, the study team worked closely with the study's participating lenders and counseling agencies to identify the specific attributes needed for the study and to eliminate duplication. Each lender requires documentation of the consent of each co-borrower on a mortgage before data on a loan's origination and servicing attributes can be shared. The study team must therefore keep detailed records of which study participants have co-borrowers and which co-borrowers have provided consent. The co-borrower consent collection activities are only conducted when the study data suggests both that the study participant has a co-borrower and that the co-borrower has not yet provided consent.

E. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I) describe any methods used to minimize burden.

The time period in which study participants could access homebuyer education and counseling services from study participating, HUD-approved counseling agencies has ended. Therefore, study participating, HUD-approved housing counseling agencies are no longer providing services to study participants or information to the study team. At this stage, the study is not working with any small businesses or other small entities.

F. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The data collection activities that are outlined in this submission are critical to ensure the study is executed as designed collecting important, long-term information from study participants.

- The Long-Term Follow-Up Survey will be administered to study participants only once.
- Study participant tracking will continue to occur every six months until completion of the Long-Term Follow-Up Survey.
- The co-borrower consent form will be completed by each co-borrower only once and is necessary to collect administrative data from the lenders.
- Loan origination and performance data and data from a credit bureau will continue to be collected every six months throughout the duration of the study.

G. Explain any special circumstances that would cause an information collection to be conducted in a manner:

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.

- Under this ICR, HUD will not conduct any data collection requiring respondents to report information to the agency more often than quarterly;
- Under this ICR, HUD will not conduct any data collection requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- Under this ICR, HUD will not conduct any data collection requiring respondents to submit more than an original and two copies of any document;
- Under this ICR, HUD will not conduct any data collection requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- Under this ICR, HUD will not conduct any data collection 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;
- Under this ICR, HUD will not conduct any data collection requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- Under this ICR, HUD will not conduct any data collection 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
- Under this ICR, HUD will not conduct any data collection requiring respondents to submit proprietary trade secrets, 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.

H. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.

In accordance with the Paperwork Reduction Act of 1995, the Department of Housing and Urban Development (HUD) published a notice in the Federal Register on March 23, 2018. The docket citation number is 83 FR 12806. The Federal Register Notice appeared on pages 12806 and 12807.

The Pre-Purchase Homeownership Counseling Demonstration and Impact Evaluation is being implemented in partnership with Abt Associates Inc. (the prime contractor), the Center for Community Capital at the University of North Carolina, Doug Dylla LLC, Stephanie Moulton at Ohio State University, and Jonathan Spader at Joint Center for Housing Studies at Harvard University.

In addition, the study has an advisory panel of approximately six academic and professional experts in the homeownership counseling field. The advisory panel includes Kenneth Brevoort (Consumer Financial Protection Bureau), J. Michael Collins (University of Wisconsin-Madison), Chris Herbert (Harvard Joint Center for Housing Studies), Carolina Reid (University of California-Berkley), Kris Rengert (FDIC), Genevieve Melford (The Aspen Institute), and Peter Zorn (Freddie Mac).

Abt Associates will conduct all activities associated with the collection of co-borrower consent, administrative data, and the Long-Term Follow-Up Survey.

I. Explain any decision to provide any payment or gift to respondents, other than reenumeration of contractors or grantees.

Throughout the study period and as previously approved in earlier collection submissions, study participants receive a \$5 check for returning tracking letters to confirm their current contact information. During the course of the study, every six months, the study team mails study participants a letter asking for updated contact information.

The study team will not provide any additional incentive to co-borrowers who complete the co-borrower consent form.

As was the case with the baseline survey and the 12-month follow-up survey and approved in earlier collection submissions, study participants who complete the final survey will receive \$35 incentive to show our appreciation for completing the survey.

J. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy.

Because of the nature of the information collected from and about study participants, strict confidentiality procedures will be followed for this evaluation. 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. As required by 5 U.S.C. 552a (Privacy Act of 1974), HUD has published a Systems of Record Notice (SORN) in the Federal Register on January 11, 2013 (Vol.78, No.8).

Prior to beginning the data collections included in this submission, the study protocols and materials will be reviewed in detail by Abt Associates' Institutional Review Board (IRB).

Informed Consent

All study participants completed the informed consent process at the time of study enrollment. The study also has procedures that allow study participants to withdraw consent at any time using procedures that have been communicated to study participants during the consent process and that can be found in the consent form or by calling the study hotline. Before administering the Long-Term Follow-Up Survey, study participants will be reminded of their consent to participant and options to withdraw from the study at any time.

Co-borrowers are also able to withdraw their consent at any time by calling the study hotline.

Data Confidentiality Protections

The study has established rigorous data security and confidentiality provisions that are described in the previous submissions. Additionally, the study's data system and data security protocol have since been reviewed by HUD and each of the study's participating lenders.

An assurance of confidentiality to the extent provided by law is included in the study participation consent agreement through which participants provide informed consent. An assurance of confidentiality to the extent provided by law also will be made to all respondents as part of the introduction to each of the surveys. The co-borrower consent script also contains the promise of confidentiality to the extent provided by law made to co-borrowers.

K. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The Long-Term Follow-Up Survey includes study participant's contact information; the stage in the home purchase process (e.g., whether the study participant made an offer on a home, purchased a home, etc.) and preparedness for home purchase (e.g., the extent of respondents' home search prior to pre-qualification, intended down payment amount, expected timeline for home purchase); and measures of time-varying study outcomes (e.g., income sources and total family income, financial literacy, non-housing savings/debts, budgeting activities, and employment and earnings); and mortgage characteristics and features (e.g., down payment, monthly mortgage payment, total loan amount, and loan type). This information will be treated as sensitive, confidential information to be used only for the purposes of this study. Prior to the Long-Term Follow-Up Survey, respondents will be reminded that they can refuse to answer any questions.

The co-borrower consent form collects the co-borrower's name and date of birth. The study's data security plan details how this information will be stored and protected.

12. Provide estimates of the hour burden of the collection of information.

The estimates of burden for each data collection activity is described below:

- The average time per study participant (up to 5,854 study participants) to complete the final Long-Term Follow-Up Survey is 30 minutes.
- The study will collect co-borrower consent verbally at the time of the Long-Term Follow-Up Survey. The study estimates that approximately 1,000 study participants will have co-borrowers. The co-borrowers' review of the co-borrower consent information and completion of the consent process is estimated to require approximately 5 minutes per co-borrower.
- The average time for lenders to prepare study participants' loan origination and performance data for the study team is 60 minutes. The study team will ask for this data semiannually from each of the three lenders during the next 2 years.
- The study mails study participant tracking letters twice per year. The average time for study participants' review of the letters and return of the tracking form is 5 minutes.

The annual burden for the study is 3,949.64 hours: 3,903 hours for study participants, 83 hours for co-borrowers, and 6 hours for lenders.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hours Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Long-Term Follow-Up Survey	5,854.00	1.00	5,854.00	0.50	2,927.00	*\$27.70	\$81,078.00
Tracking Letter	5,854.00	2.00	11,708.00	0.08	936.64	*\$27.70	\$25,944.92
Co-borrower consent form	1,000.00	1.00	1,000.00	0.08	80.00	*\$27.70	\$2,216.00
Loan origination and performance data: Lenders	3.00	2.00	6.00	1.00	6.00	\$35.00	\$210.00
Total	12,711.00	----	----	----	3,949.64	----	\$107,232.92

*The average income that our study participants received in the last 12 months is \$57,811. This estimate of average income is based on responses to the Short-Term Follow-Up Survey and was weighted to represent the full study sample using sample weights that adjust for follow-up survey nonresponse. Thus, the hourly rate for our study participants is estimated at \$27.70 (using the U.S. Office of Personnel's national standard of 2,087 hours per year for a full-time employee).

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. Do NOT include the labor cost (wage equivalent) of the burden-hours described in Item 12 above. The information required here corresponds to that in item 14 on the 83-I (cost to the public).

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 A.12 above. There is no known cost burden to the respondents.

14. Provide estimates of annualized cost to the Federal government.

The survey contract has not yet been procured. The cost to the government might be between \$1 million to \$2 million. The estimate will be available upon award of this research contract. Because it is in procurement, detailed information may not be provided at this time.

15. Explain the reasons for any program changes or adjustments reported in Items 13 and 14 of the OMB Form 83-I.

For Item 13, the annual reporting and recordkeeping annual hour burden changed from 6,079 hours to 3,992 hours for these new data collection activities.

16. For collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

This section describes the tabulation plan and analyses that will be conducted by the study. The impact analyses rely on data collected under both the prior submission and this submission.

Impact Analyses

Data from the Long-Term Follow-Up Survey and administrative data will supplement the information collected during the initial phase of the study to conduct the impact analyses. These analyses will rely on the data collection activities covered by the prior submission for baseline measures of the time-varying study outcomes and to define covariates and subgroups for the impact analyses. These covariates serve the important purpose of increasing the precision of impact estimates, thereby reducing the size of an impact that we can detect, if it exists, given sample size constraints. In addition, subgroups may be defined with respect to borrower personal characteristics (from the baseline survey); financial characteristics (from the baseline survey and baseline credit bureau data); and neighborhood characteristics (which requires knowledge of the borrower's address from the baseline survey).

The Long-Term Follow-Up Survey and administrative data provide the information used to construct the outcomes for the Impact analyses. The experimental evaluation design balances the pre-existing characteristics of the study participants assigned to each of the treatment groups and to the control group. Therefore, the impact of being offered a treatment can be estimated by simply comparing mean outcomes of those offered each treatment, relative to those in the control group. In practice, we estimate the impact of offering the intervention's services with multiple regression, which uses baseline variables as covariates to increase the precision with which the intervention's impact is estimated.

As permitted by randomization into multiple treatment groups, we plan to estimate the impact of the intervention by service delivery mode: the impact of in-person services, the impact of remote services, and the impact of choice of service modes. In addition to estimating impacts on subgroups defined based on the baseline characteristics of study participants, we anticipate examining endogenously-defined subgroups defined by, for example, treatment intensity. The counseling agencies' service tracking data collected under both this submission and the prior submission will provide the measures of treatment intensity for the impact analyses. Part B describes the study's statistical approach for conducting the treatment-control comparisons, subgroup analyses, service delivery mode effects, and dosage analyses in more detail.

Study Schedule

Under the current schedule, the Long-Term Follow-Up Survey will be administered to study participants between 48 and 60 months after study enrollment. The collection of updated contact information will continue to be collected every six months until the study participant conducts the Long-Term Follow-up Survey. The collection of co-borrower consent will correspond to the start of administering the Long-Term Follow-Up Survey to study participants and continue until the conclusion of survey administration. The study team will continue to collect loan origination and performance data once every six months throughout the study period.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

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

18. Explain each exception to the certification statement identified in item 19.

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