

**Supporting Statement for Paperwork Reduction Act Submissions  
Data Collection for EnVision Center Demonstration Sites  
(OMB# 2528-XXXX)**

**A. Justification**

- 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.**

Housing and Urban Development (HUD) seeks to collect data from the EnVision Center Demonstration sites to find out the effectiveness of collaborative efforts by government, industry, and nonprofit organizations to accelerate economic mobility of low-income households in communities that include HUD-assisted housing. In its report released in January 2011, that focused on Temporary Assistance for Needy Families, Employment Services and Workforce Investment Act Adult employment programs funded by the U.S. Departments of Labor, Education, and Health and Human Services, the Government Accountability Office (GAO) found that efficiencies in offering government services could be achieved by co-locating services and consolidating administrative structures. EnVision Centers aim to help foster efficiencies through co-locating government services and consolidating administrative structures.

Data collection is necessary to assess and determine eligibility for EnVision Center designation, to identify other activities to be conducted at EnVision Centers and to help measure the overall success of the demonstration. The Advanced Federal Register Notice published December 12, 2017 (82 FR Vol. 58441 No. 237). Under the leadership of President Donald J. Trump, the Administration is committed to reforming government services and expanding opportunities for more Americans to become self-sufficient. We anticipate this demonstration to continue through the administration. As outlined in the Advanced Federal Register Notification, the demonstration builds upon existing partnerships and continues collaborative work to improve the lives of residents housed with HUD assistance, by providing a forum by which cross-sector organizations can come together to design and implement local interventions to advance self-sufficiency and economic mobility through a four-pillar approach to opportunity. The four pillars are: (1) Economic Empowerment, (2) Educational Advancement, (3) Health and Wellness, and (4) Character and Leadership. HUD believes that these four pillars can be the foundation for driving collaboration amongst communities, the private sector, and the federal government, intended to improve the quality of life of HUD-assisted and low-income households and to empower them to become self-sufficient.

This study is authorized by title V of the Housing and Urban Development Act of 1970 (12 U.S.C. 1701z-1 et seq.) on “Research and demonstrations; authorization of appropriations; continuing availability of funds” which states “The Secretary of HUD is authorized and directed to undertake such programs of research, studies, testing, and demonstration relating to the mission and programs of the Department as he determines to be necessary and appropriate.” Full language can be found in the appendix.

**2. 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.**

This is a new data collection effort, as EnVision Centers is a new demonstration sponsored by HUD. HUD's Office of Policy Development & Research plans to use the data for multiple purposes. HUD will use both the Letters of Commitment and Action Plans to assess an organization's intent to promote and expand economic mobility within their local community and determine their readiness in becoming an EnVision Center. Action Plans will describe the goals of the community's participation in the demonstration and provide, to the extent as possible, objective goals regarding the number of partnerships established with state and local government, non-profits, faith-based organizations, and private and philanthropic organizations. The Action plan serves as a vehicle for bringing together stakeholders and providing them with a tangible path for achieving the goals of the EnVision Center. These plans will specify and formalize the participation of community stakeholders, describe gaps in current service delivery models, describe the onsite arrangements for intake processing and referrals to network stakeholders, identify the physical location(s) which can act as a shared services site to house the EnVision Center, and/or outline specific benchmarks and goals for the EnVision Center. These plans could also capture the goals of the community's participation in the demonstration and provide, to the extent possible, objective indicators of success regarding the number of partnerships established with state and local government, non-profits, faith-based organizations, and private and philanthropic organizations. Progress reports will be required on a quarterly basis in order to track EnVision Center implementation, assess and address Technical Assistance (TA) needs, and monitor activities, outputs and outcomes. A EnVision Center Survey will be administered within 30-days to individuals who go through the EnVision Center's intake process. This will provide information about how participants are experiencing the supports, referrals, and placement processes.

**3. 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, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

The primary source of data collection will be captured through the Letter of Commitments (Appendix A), Action Plans (Appendix B), Quarterly Reports (Appendix C) and the Envision Center Survey (Appendix D). The templates are attached and will be transmitted to HUD electronically (via email). This should reduce staff time for a more expedited review.

**4. 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.**

The EnVision Center Demonstration is a new initiative at HUD, therefore this is the first time this information is being collected. The information we will be asking them to report on is solely on the operation of the EnVision Centers Demonstration. We are asking information that other federal agencies are not capturing. However, we will re-purpose data that is being made publicly available on employment, education, health and volunteerism.

**5. 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.**

This information collection will not have a significant economic impact on a small businesses or other small entities.

**6. 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.**

As shared in the response to Question #2, HUD wants to collect this data for several purposes. In the absence of such data, HUD will not be able to assess an organization's proposed plans to promote and expand economic mobility within their local community, nor be able to determine their readiness to become an EnVision Center. In the absence of this data, Technical Assistance needs cannot be determined and the overall progression of the initiative will not be measurable.

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

- **requiring respondents to report information to the agency more than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **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;**
- **requiring the use of a statistical data classification that 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; or**
- **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.**

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320 (Controlling Paperwork Burdens on the Public). There are no special 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.
8. **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.**
- **Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported.**
  - **Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.**

On December 12, 2018, a 60-Day Federal Register Notice of Proposed Information Collection: Data Collection for EnVision Center Demonstration Sites was published at 83 FR Vol. 63902 No.

238. The only comment received was on 2/11/2019 from the Community Action Partnership. The comments are listed below and in (Appendix E). We responded to the comments on 2/22/2019 and the response from HUD is below.

The Community Action Partnership (Partnership), the national Association that represents Community Action Agencies (CAAs), is writing to officially submit comments on the **HUD EnVision Centers Demonstration Data Collection**.

Specifically, the Partnership is submitting comments on items:

Question 1: *Whether the proposed collection of information for the proper performance of the functions of the agency, including whether including whether the information will have practical utility.*

Question 3: *Ways to enhance the quality, utility, and clarity of the information to be collected.*

HUD response:

Mr. Harlow-

Thank you for your recent comments on the [insert notice title]!

The Department of Housing and Urban Development (HUD) agrees with your responses to Questions (1) and (3) of the 60-day Notice “Data Collection for EnVision Center Demonstration Sites.” As you are aware, dFree is the National Anchor Partner for the EnVision Center Demonstration. We plan to share your letter with dFree as information about your organization (Community Action Partnership [CAP]) and the Community Action Agencies (CAAs) your organization represents.

Again, thank you for your comments.

Sincerely,

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

HUD will not provide payment, remunerations, or gifts to respondents.

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

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).

Authority to offer confidentiality, to the extent permitted by law, is made on the basis of:

- 1) Section 3(b) of the HUD Act, as amended, 42 U.S.C. 3532, authorizes the Secretary to “conduct continuing comprehensive studies, and make available findings, with respect to the problems of housing and urban development.”
- 2) Section 502(g) of title V of the HUD, as amended, 12 USC 1701z-2 (g), authorizes the Secretary “to request and receive such information or data as he deems appropriate from private individuals and organizations, and from public agencies.” It further provides that “any such information or data shall be used only for the purposes for which it is supplied, and no publication shall be made by the Secretary whereby the information or data furnished by any particular person or establishment can be identified, except with the consent of such person or establishment.

**11. 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.**

No questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private will be asked of respondents.

**12. Provide estimates of the hour burden of the collection of information. The statement should: indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices. Note: If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**

Envision Center sponsors may include Public Housing Authorities (PHAs), state and local governments, Tribes, Tribally-Designated Housing Agencies, participating jurisdictions, housing counseling agencies, multifamily owners/operators, faith-based and nonprofit organizations, and Continuums of Care (CoC). *Respondents (i.e., affected public):* Executive Sponsor, Center Coordinator, Navigator and Participants.

Respondent	Occupation	SOC Code	Median Hourly Wage Rate
EnVision Center Executive Sponsor	Chief Executive	11-1011	\$88.11
EnVision Center Director	General and Operations Managers	11-1021	\$48.27
EnVision Center Navigator	Social and Human Service Assistant	21-1093	\$15.92
EnVision Center Participant	Federal Minimum Wage Rate	N/A	\$7.25

Source: Bureau of Labor Statistics, Occupational Employment Statistics (May 2017), [https://www.bls.gov/oes/current/oes\\_stru.htm](https://www.bls.gov/oes/current/oes_stru.htm) and Department of Labor, Minimum Wage (2009), <https://www.dol.gov/general/topic/wages/minimumwage>

The EnVision Center Executive Sponsor and Envision Center Director at the 200 EnVision Centers will complete the Commitment Letter. The EnVision Center Executive Sponsor, EnVision Center Director and the EnVision Center Navigator will complete the Action Plan and the Quarterly Report while the EnVision Center Participant will complete the Customer Satisfaction Survey.

*For the Letter of Commitment*, it is assumed that the EnVision Center Executive Sponsor and the EnVision Center Director will need 0.25 hours to complete this a year. The total number of respondents would be 200 based on the 200 centers.

*For the Action Plan*, it is assumed that the EnVision Center Executive Sponsor and EnVision Center Director will need one hour to complete this and the EnVision Center Navigator will need seven hours to complete this for an average of 8 hours total.

*For the Quarterly Reports*, it is assumed that the EnVision Center Executive Sponsor and EnVision Center Director will need one hour to complete the review and the EnVision Center Navigator will need five hours to complete this task for an average of 4 hours total.

*For the EnVision Center Survey*, we anticipate an average 200 Envision Center Participant visits a year from each of the 200 centers. This is a total of 40,000 respondents per year with each survey having a completion time of three minutes.

All assumptions are reflected in the table below.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hours per Response	Annual Burden Hours	Hourly Cost per Response	Annual Cost
<b>Letter of Commitment</b> (Completed by the EnVision Center Navigator/EnVision Center Executive Sponsor/EnVision Center Director)	200.00	1.00	200.00	0.25	50.00	\$68.19	\$3,409.50
<b>Action Plan</b> (Completed by the EnVision Center Navigator/EnVision Center Executive)	200.00	1.00	200.00	8.00	1,600.00	\$22.45	\$35,920.00

Sponsor/EnVision Center Director)							
<b>Quarterly Report</b> (Completed by the EnVision Center Navigator/ EnVision Center Executive Sponsor/EnVision Center Director)	200.00	4.00	800.00	4.00	3,200.00	\$24.63	\$78,816.00
<b>EnVision Center Survey</b> (Completed by the EnVision Center Participant)	40,000.00	1.00	40,000.00	0.05	2,000.00	\$7.25	\$14,500.00
<b>TOTAL</b>	40,600.00	--	41,200.00	--	6,850.00	--	\$132,645.50

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information (do not include the cost of any hour burden shown in Items 12 and 14).**

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There are no additional total annual cost burdens to respondents or record-keepers beyond the labor cost of burden-hours described in item 13 above.

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



Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Commitment Letter and Action Plan	200.00	3.00	600.00	0.08	48.00	\$62.23	\$2,987.04
Quarterly Reports	200.00	4.00	800.00	0.50	400.00	\$54.91	\$21,964.00
Total	--	--	--	--	-	---	\$24,951.04

Approximately 200 Letters of Commitment and Action Plans are expected to be received for the EnVision Demonstration Sites. They will be reviewed by three people (average grade GS14 step 5, at \$62.23 per hour in the Washington area). Each of the Commitment Letters and Action Plans combined will requires the individual reviewers approximately 8 labor hours to process and review. The cost to the Federal government is:

200 Letters of Commitment and Action Plans \* 0.08 hours/application \* 3 readers = **48 labor hours**

48 labor hours \* \$62.23 per hour = **\$2,987.04**

The total hours expended by Federal government employees are therefore 48 hours, and the total cost is estimated to be \$2,987.04.

For ongoing monitoring and management of the Envision Center Demonstration Sites, approximately 200 sites are expected. Quarterly reports will be reviewed by the HUD technical monitor (average grade GS14 step 1, at \$54.91 per hour in the Washington area). Each report is expected to require 4 labor hours to process and review. The cost to the Federal government is:

200 sites \* 0.50 hours/report \* 4 reports/year = **400 labor hours/year**

400 labor hours/year \* \$54.91 per hour = **\$21,964.00/year**

The total hours expended by Federal government employees are estimated to be 400 hours, and the total cost is estimated to be \$21,964.00. These will be ongoing annual costs for the duration of the sites. It should be noted that similar costs are already incurred by the government through the management of similar research efforts issued through the federal contracting process. HUD expects the net cost of this collection to the government will not be material.

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

This is a new HUD initiative.

**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.**

Action Plans and Letters of Commitment will be submitted as soon as OMB grants approval. The EnVision Center Demonstrations sites will be designated up and running in July. The Customer Satisfaction Survey will thus begin in July as well. Quarterly reports will begin in October of 2019, (or three months after the sites are open). We do not intend to publish a report and we do not intend to use advance statistics.

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

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

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

No exceptions are necessary for this information collection.

**Part B. Collections of Information Employing Statistical Methods**

No statistical methods will be used for the EnVision Center Demonstration Sites collection.

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