

**Supporting Statement for Paperwork Reduction Act Submission  
Family Unification Program - Family Self-Sufficiency Demonstration Evaluation  
OMB Control # 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.**

**Summary**

The Family Unification Program - Family Self-Sufficiency (FUP-FSS) Demonstration, authorized in the U.S. Department of Housing and Urban Development's (HUD's) Fiscal Year 2015 appropriations, was designed to test whether combining FUP and the FSS program for eligible youth would result in beneficial outcomes. The demonstration program was first announced in January 2016.

As a part of the demonstration, the time limit on FUP youth rental assistance was extended to correspond with the length of the FSS contract, which is typically five years but may be extended further by the public housing authority (PHA). Initially, this was an increase from 18 months. FUP youth vouchers were then extended to 36 months at around the time the demonstration was announced. No funds or additional FUP vouchers were allocated for the demonstration, although certain regulatory requirements would be relaxed for participating public housing authorities (PHAs), with the aim of better aligning the existing program into the new approach. As a result, all participating PHAs would already have FUP allocations. Participating PHAs could also choose to modify their FSS programs to better meet the needs of youth participants. The most recent FUP awards (FY17, FY18, and

FY19) have required a partnership with the local Continuum of Care (CoC), which can increase referrals of eligible youth through coordinated entry.

The main goal of the FUP-FSS Demonstration Evaluation is to assess whether the combination of FUP and FSS, along with the extension of time limits, has been an effective approach to improving outcomes for youth aging out of foster care. The evaluation will also assess whether FUP-FSS has provided an avenue for closer and more productive partnerships between PHAs, Public Child Welfare Agencies (PCWAs), CoCs, and other youth-focused organizations. This includes capturing information about how PHAs, with their PCWA partners, have worked together to implement the demonstration program and the lessons learned from their experience to date. Given that initial take-up rates and FUP youth voucher issuances have generally been low, an additional baseline goal will be to assess the extent to which the FUP-FSS program is in fact being actively implemented across the 51 PHAs participating in the demonstration—and why some sites that applied to the FUP-FSS demonstration do not appear to be implementing the demonstration program or issuing many FUP youth vouchers. To this end, while many of the core questions are focused on implementation issues and challenges, the evaluation will also necessarily explore why some demonstration sites do not appear to be fully engaged with the program. Finally, a goal of the evaluation is to measure short-term outcomes for participating youth and determine emerging trends. Longer-term outcomes will not be measured at this time as the demonstration only began in 2016 and FSS participation may be up to 5 or more years. As a result, demonstration participants are unlikely to have graduated from the FUP-FSS demonstration by the completion of this study.

This project will collect information through the following methods: (1) Study investigators (from the Urban Institute) will administer an agency-level web-based survey to all 51 PHAs and their PCWA partners participating in the demonstration. (2) Investigators will conduct one-time telephone interviews with up to 30 staff from a sample of 10 PHAs and their corresponding PCWA partners (20 PHA staff and 10 PCWA staff) in the demonstration to gather more nuanced information than can be collected in the web-based surveys. (3) Investigators will also visit three FUP-FSS demonstration sites to conduct interviews with up to 33 staff—at all three sites combined—who work with FUP-FSS youth (up to 21 PHA staff, up to six PCWA staff, up to three CoC staff, and up to three community service provider staff), as well as in-depth interviews with a small sample of up to 18 youth participants. (4) Investigators will analyze Public and Indian Housing Information Center (PIC) and Voucher Management System (VMS) data to describe the characteristics of the participating PHAs and FUP-FSS participants and measure short-term participant outcomes.

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 FSS program, started in 1990 and administered by HUD, has provided services to families and adults designed to increase earned income, reduce subsidy dependence, and achieve economic independence and self-sufficiency. HUD-assisted families who are selected for the program and voluntarily participate sign an FSS Contract of Participation. The FSS contract is generally for a period of five years but may be extended by the PHA

for up to two years for good cause. The FSS contract specifies rights, responsibilities, goals, and services in the family's Individual Training and Services Plan (ITSP), and the family works with an FSS program coordinator to assist in the completion of a range of selected intermediate and long-term goals such as job training and employment counseling, child care, financial literacy, and homeownership counseling.

One of the benefits of the FSS program is the interest-bearing escrow account established by the PHA on behalf of the participating families. In traditional voucher programs, participants contribute 30 percent of their income to rent; if incomes increase, so do participating households' portions of rent payments. In the FSS program, increases in rental payments resulting from increases in earned income are placed in an interest-bearing escrow account. At the end of the contract term and upon program graduation, the family can access total escrow funds and use them for any purpose.

Evaluations of the FSS program have found mixed results, although participants have been shown to have higher incomes and to benefit from frequent contact with case managers (de Silva, et al., 2011). Relevant to the current evaluation, youth participation in FSS has been low. This may be in part due to FUP offering adequate services with fewer requirements, and to a mismatch between the maximum allowable FSS contract term and the time horizons of FUP youth participants.

The Family Unification Program, also started in 1990, provides Housing Choice Vouchers (HCVs) to two populations:

- Families for whom the lack of adequate housing is a primary factor in either the imminent placement of their child or children in out-of-home care, or in

the delay to discharge their child or children to the family from out-of-home care; and

- Youth at least 18 years and not more than 24 years of age who left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in Section 475(5)(H) of the Social Security Act, and are homeless or are at risk of becoming homeless at age 16 or older.

FUP is administered by PHAs in partnership with PCWAs. The PCWAs are responsible for referring FUP families and youth to partner PHA(s) to determine rental assistance eligibility. The PHAs, in turn, place families or youth on their HCV waiting lists.

To date, youth participation in FUP has been low. One potential explanation for this is its original time limit: while there is no time limit on FUP family vouchers, FUP youth vouchers were originally limited to 18 months, which did not align with regular annual lease terms and was insufficient for youth to achieve housing or economic stability. This led to a change to a 36-month time limit in 2016. Maximum age eligibility for FUP youth was also extended to 24 (from 21) in 2016 to further reduce barriers to program access. Finally, referral rates of youth to PHAs by PCWAs have generally been low. Most PCWAs prioritize referring families over youth because serving families keeps more children from entering or remaining in foster care, and youth who become eligible for FUP after leaving care are difficult to identify for PCWAs (Dion, et al., 2014). Lack of resources for the supportive services required from the PCWA is also a barrier to serving youth with FUP (Dion, et al., 2014).

Designed to improve outcomes for youth aging out of foster care by combining FUP and FSS and extending time limits, the FUP-FSS demonstration was authorized in HUD's FY 2015 appropriations and first announced in January 2016. Fifty-one PHAs nationwide applied for the FUP-FSS demonstration, and all 51 were accepted by HUD. Enrollment of youth participants began after July 2016, as new vouchers became available due to turnover. As per HUD's 2019 Notice of Funding Availability for the FUP-FSS evaluation, in June 2018 there were 499 active youth vouchers (versus an allocation of 7,264) being issued by 39 of the 51 participating agencies, and only 16 had issued 10 or more.

***Information Collection Request (ICR) Overview***

This Information Collection Request (ICR) includes seven data collection instruments to collect information from FUP-FSS demonstration sites and participants:

***Instruments to collect data from PHAs:***

1. PHA Interview Protocol (Attachment A.6)
2. PHA Survey Instrument (Attachment A.7)

***Instruments to collect data from PCWAs:***

3. PCWA Interview Protocol (attachment A.8)
4. PCWA Survey Instrument (attachment A.9)

***Instruments to collect data from other agencies:***

5. Continuum of Care Administrators Interview Protocol (attachment A.10)
6. Community Service Provider Interview Protocol (attachment A.11)

***Instruments to collect data from youth participating in the FUP-FSS demonstration:***

7. Youth Participant Interview Protocol (attachment A.12)

**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.**

The main goal of the present evaluation is to assess whether the combination of FUP and FSS, along with the extension of time limits, has been an effective approach to improving outcomes for youth aging out of foster care. Related to this is whether it has provided an avenue for closer and more productive partnerships between PHAs, PCWAs, and other youth-focused organizations. This includes capturing information about how PHAs, with their PCWA partners, have worked together to implement the demonstration program and about the challenges and lessons learned from their experience to date.

Given that initial take-up rates and FUP youth voucher issuances have generally been low, an additional baseline goal will be to assess the extent to which the FUP-FSS program is in fact being actively implemented across the 51 PHAs participating in the demonstration—and why some sites that applied to the demonstration do not appear to be implementing the program or issuing many FUP youth vouchers. To this end, while many of the core evaluation questions are focused on implementation questions and challenges, it will also explore why some demonstration sites do not appear to be fully engaged with the program.

Finally, a goal of the evaluation is to measure short-term outcomes for participating youth and determine emerging trends. However, since the demonstration only began in 2016, participants are unlikely to have graduated from the full program by the completion of this study, which may affect this final goal.

## ***Research Questions***

This evaluation is designed to answer a range of questions about FUP-FSS implementation and early outcomes. The research questions are organized in five main topic areas below.

Each may be answered through multiple data collection modes.

The five topic areas and associated research questions are:

1. **PHA/PCWA participation in the demonstration.** PHAs and their PCWA partners chose to apply for the demonstration. This set of questions addresses their motivations and perspectives about the demonstration and describes the PHAs, PCWAs, and other organizations participating in the program and how they compare to their national peers.

» **What are the characteristics of participating PHAs?** How do they compare to PHAs that administer FUP vouchers but did not apply for the program? Are there differences between groups in how long they've administered FUP, total households served, FUP and FSS program sizes, staff tenures and qualifications, regional locations, jurisdictional characteristics, or Moving to Work (MTW) status?

» **What is the motivation for participation?** What was the initial motivation to apply to participate in the demonstration? How did the PHAs define their need for this demonstration? Do PHA staff feel that participating in the demonstration has been beneficial, and if so, in what ways?

» **What is the PCWA’s perspective on the demonstration?** What role, if any, did the PCWA play in the decision to apply to be a demonstration site? Has it changed since the demo began? Does the PCWA still refer FUP-eligible youth for this demonstration? Why or why not? Has the demonstration made them more or less likely to refer youth? What are PCWAs’ suggestions for improving the program? What needs to change for the program to be more effective?

2. **Program implementation.** These program-level questions seek to describe the PHA/PCWA FUP-FSS partnerships.

» **How are FUP-FSS programs structured and implemented and how much do the program models vary?** When did the PHAs start enrolling youth in the demonstration? How is the demonstration being implemented? What features and strategies work better than others? Have participating PHAs adapted their FSS programs to address youth needs? Have participating PHAs or PCWAs adapted services to address FUP youth needs? How are FUP-FSS programs staffed? Are FSS coordinators staffed by the PHA or by partner organizations? To what community services are FUP-FSS youth referred? How do PHAs track their engagements with FUP-FSS youth and report participant information to HUD? How do they track outcomes for FUP-FSS youth? How frequently are they tracked (e.g. monthly, semi-annually)?

» **What have been the major early implementation successes?** Have more youth been referred to FUP? Have more youth enrolled in FSS, relative to prior to the demonstration and relative to all PHAs administering FUP? Have

youth sustained their participation in FSS? Have program partners identified any early trends or progress towards FUP-FSS participants' contracts/goals?

» **What are the challenges and/or barriers to implementing the FUP-FSS demonstration?** Have there been challenges to recruiting or referring youth (either by PCWAs, or by PHAs recruiting existing FUP youth)? If participation is low, to what does the PHA attribute this? How does the dispersion of residences under tenant-based vouchers make it challenging to engage youth in services? How do service needs vary for FUP-FSS participants compared to other FSS participants, and how have PHAs responded? Are appropriate services available through participating PHAs or referrals to local service providers? What challenges do PHA staff, such as voucher case managers or FSS coordinators, face in engaging with and meeting the needs of FUP-FSS youth? For the PHAs with MTW status, how have MTW flexibilities allowed agencies to adapt their programs or services to better meet the needs of youth?

» **How does serving youth aging out of foster care differ from serving families or other demographic groups?** How do programs that serve former foster youth adapt to these unique needs? How does the trauma youth have experienced influence needs? How does having been “system-involved” affect youths' abilities to engage in services, develop self-efficacy, and move to self-sufficiency?

3. **PHA/PCWA collaboration.** The demonstration relies on a partnership between the PHA and PCWA for its success. As these partnerships already existed when the

demonstration began, these questions focus on the structure and relationship of the partnerships and how the demonstration has affected them.

» **What are the child welfare and FSS support system contexts for FUP-FSS youth?** For example, are PHAs located in extended foster care states? Is the coordination with a local county PCWA or a single state-level PCWA? Are PHA/PCWA partnerships newly established or continuations of previous FUP or other partnerships?

» **Has the FUP-FSS partnership led to more meaningful collaborations generally between PHAs, PCWAs, and other program partners?** Has the demonstration affected the coordination and collaboration between the PHA and the PCWA? Have the partnerships developed or increased engagement such as jointly reviewing the status of FUP applicants or participants (e.g. incomplete application, still searching for housing)? Have they developed cross-agency trainings on FUP-FSS? Has the demo resulted in other collaborations between the PHA and PCWA (e.g., other housing for youth, supportive housing for families)?

4. **Youth participation in the demonstration.** Youth participation can be affected at several stages, reflecting PCWA priorities (e.g., how many FUP vouchers to allocate), caseworker behavior in referring to FUP, external referrals such as from the CoC, and youth decisions. The pathway to enrollment suggests several underlying research questions:

» **How do PCWAs identify FUP-eligible youth?** What sources inside and outside the PCWA help these agencies identify FUP-eligible youth? How are youth referred to the PHA? For example, do FUP-eligible youth ever refer

themselves, is it based on caseworker referral, is there a centralized review of youth reaching the age at which they would age out of the system, or are there other mechanisms for referral?

» **Do PCWAs market or promote the demonstration to potentially eligible youth?** If so, how? Do they do this as part of the transition planning process? What do caseworkers tell the youth about the benefits of enrolling in FUP and in FSS?

» **Is the CoC a partner to the PHA/PCWA collaboration?** If so, what, if any, barriers does the CoC encounter for referring youth?

» **How do youth navigate and perceive FUP and the FUP-FSS program?** How do youth learn about the demonstration? How were they engaged and recruited and referred to FUP-FSS, and what factors influenced their decision to participate or choose not to participate? How do PHAs recruit and engage eligible youth in the FUP-FSS demonstration? Was the extended FUP-FSS voucher time period a motivating factor for participation? Were the case management services offered by FSS a motivating factor?

» **Do youth feel the program meets their needs?** Did the program help them obtain housing? Has the program helped them maintain their housing? Has the program enabled them to pursue education and employment opportunities that would have otherwise been unattainable or difficult to attain? What aspects of the program do youth identify as working well? What areas do they identify as needing improvement, and how can the program better meet their needs? What challenges to increased self-sufficiency do youth identify experiencing during the

demonstration, and how have they addressed those challenges? How do they think their life experiences have affected their ability to benefit from the demo? How do they think the demonstration deals with the impact of their life experiences?

» **What are unique considerations to engaging and serving former foster**

**youth?** Do FSS goals vary for FUP youth compared to other FSS participants?

Do housing and self-sufficiency services vary for FUP youth compared to other FSS participants? How do housing search and self-sufficiency service needs vary for FUP youth compared to other FSS participants?

» **What are the characteristics of FUP-FSS participants?** How many youths participate in the FUP-FSS program? What percentage of all FUP youth participate in FSS? How do FUP-FSS participants compare in age, gender, race/ethnicity, household composition, income, employment and educational status to FUP youth who opt out of the demonstration?

5. **Youth Outcomes.** The demonstration is in its early stages. These questions focus on identifying short-term outcomes indicative of youth progress toward self-sufficiency.

» **What short-term outcomes are youth achieving?** Are youth sustaining FSS participation? What is the average length of FUP participation for those enrolled in the demo compared with those who have opted out of FSS? For those youth enrolled in the demonstration, what are their self-sufficiency goals, and do they feel they are achieving them? What is their experience working with case managers and other community service providers? What are perceived benefits

and challenges to FUP-FSS participation? Do they feel they are making progress towards their goals?

- 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 study incorporates a survey, as well as phone and semi-structured interviews. For each data collection activity, the contents of each instrument were compared against the research questions forming the project's goals to ensure each instrument is thorough yet collects only the minimum information necessary for the project's purpose. The contractor will conduct the data collection activities involving public burden using the data collection mode that is (1) most appropriate for the research questions it is answering, and (2) minimizes burden.

The survey of PHAs and PCWAs will take advantage of computer-assisted survey technology to reduce burden on respondents. The 30-minute web-based instrument will offer the easiest means of providing data, as it will be programmed to automatically skip questions not relevant to the respondent. The instrument will also allow respondents to complete the survey at a time convenient for them without the risk of their losing a paper survey questionnaire. If respondents are unable to complete the survey in one sitting, they may save their place in the survey and return to the questionnaire at another time. The survey instrument will automatically skip to the next appropriate question based on a respondent's answers, reducing missing data.

The other components of the project require direct person-to-person communication, and using such technology would not allow the flexibility the project requires nor capture the depth of qualitative information needed to fully understand how the FUP-FSS demonstration

is administered and experienced. To reduce respondent burden, the project team will hold small-group interviews, rather than one-on-one interviews, when feasible. Small-group interviews reduce the overall time that a single organization spends on the study. The project team will try to schedule the interviews when the input from multiple respondents with comparable roles (e.g. child welfare case workers) will increase the amount of information the project team can gather in a single session. With respondents' permission, the project team will audio-record the interviews to minimize time needed for potential follow-up for clarification.

**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.**

We have designed the data collection instruments so that no two instruments collect the same information, even when addressing the same research question. We note, however, that different respondents may be asked the same questions to capture different knowledge and different perspectives. This provides a more robust description of the FUP-FSS demonstration.

For survey respondents also participating in the HHS-funded FUP youth study run by the same research team, the survey will include skip patterns to ensure they do not answer the same questions multiple times. The research team will work on a data sharing agreement to share survey data between the two projects.

Additionally, no other source outside of HUD, either public or private, has been identified that provides the information available from these data collections. There is no similar information available at the national, regional, or even at the local level, that could be used or modified for use for the purposes described.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1) describe any methods used to minimize burden.**

The web-based survey will collect data from local agencies that may vary in size. PHA and PCWA respondents are from public agencies and not small businesses, though they may contract out to service providers that are small businesses. To minimize burden on small entities, the questionnaire will be available in a web version, and respondents may access it at their convenience. The expectation is that the organization staff best suited to respond to the survey will have high-level knowledge of the FUP-FSS demonstration. The survey asks for only minimal information that may require accessing records, so it is not likely to pose undue burden on small entities. Rather, the data collection instrument will ask respondents about the community context of their programs and the use of the demonstration for youth aging out of foster care. Further, the team will minimize the burden on any staff from small businesses who participate in site visit data collection by keeping the interviews as short as possible while still gathering relevant data from each respondent by scheduling the interviews at a time most convenient for respondents, holding them on-site at places of employment or service provision, and not requesting written responses.

**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.**

The survey is a one-time data collection event, with no repetition of data collection planned. Interviews will only take place once with each respondent. The proposed data collection activities aim to provide the government with evidence on whether and how the FUP-FSS demonstration is being used to meet the housing and self-sufficiency needs of youth aging out of foster care. If the proposed activity is not implemented, the government will have to

rely on incomplete or limited information to assess current implementation and usage of the demonstration, and to recommend program or policy improvements.

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. The following below are **“Not Applicable”** to this collection:

- 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 – “**Not Applicable**”; 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 – “**Not Applicable**”.

**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. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

- **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.**

In accordance with the Paperwork Reduction Act of 1995, HUD published a 60-Day Notice of Proposed Information Collection in the Federal Register on January 13, 2020. The Docket No. is FR-7016-N-05 and the notice appeared on pages 1822-1823. The notice provides a 60-day period for public comments, and comments are due March 13, 2020.

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

Agency heads and staff will not receive a payment or gift for participating in interviews, nor will web-based survey respondents receive payments or gifts.

The project team will give each youth participant involved in the demonstration who participates in interviews one \$25 gift card to encourage participation among those youth who might not otherwise take part in the research. By encouraging otherwise reluctant young adults, the study reduces the risks associated with nonresponse bias – namely the risk that the research team draws inaccurate or biased conclusions about the program.

Respondent participation is voluntary. The \$25 for youth interview participants is intended to assist with transportation costs, child care, or other expenses that might prevent some in our target population from participating – i.e., those with the greatest financial challenges or other barriers, and whose absence could contribute to nonresponse bias.

Research has shown that such tokens of appreciation are effective at increasing participation from populations with lower education levels (Berlin et al., 1992) as well as low-income and nonwhite populations (James and Bolstein, 1990).

Generally, research designs involving interviews with program participants use tokens of appreciation to offset the requirements that the design poses on participants to appear at a meeting at a pre-set location and time (Liamputtong, 2011). While research on nonresponse bias often applies to household and other surveys, experimental studies conclude that the tokens of appreciation give an added boost to encourage participation among those with less inherent interest in the topic (Groves, Singer, and Corning, 2000; Groves et al., 2006), those who are more vulnerable due to income or less education (Knoll et al., 2012), and potentially participants who feel less strongly – whether positively or negatively – about the program and less motivated to participate without some tokens of appreciation (Groves, Singer, and Corning, 2000).

Based on the research team’s prior experience with studies of similar young adult populations, \$25 is high enough to support participation, but not so high that it is overly generous or that participants would feel the token of appreciation is excessive or coercive. The amount is based on what was approved by OMB in past studies for qualitative data collection with similar low-income, hard-to-reach populations, such as the Descriptive Study of Tribal TANF programs (\$25, OMB #0970-0411, expiration date October 31, 2013), the Goal-Oriented Adult Learning in Self-Sufficiency (GOALS) Study (\$25, OMB # 0970-0472, expiration date January 31, 2018), and the study on Same-sex Relationships: Updates to Healthy Marriage and Relationship Education (\$25, OMB# 0970-0479 , expiration date April 30, 2017).

To prevent the token of appreciation from being coercive, the project team will give participants who show up to the interview the incentive upon arrival, regardless of whether an individual ultimately chooses to stay and participate.

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

***Personally Identifiable Information***

The information we collect will be kept private to the extent permitted by law. No personally identifiable information (PII) will be requested from program participants. Names will not be linked to comments or responses. Data will be publicly reported in aggregate form only.

Urban will obtain Institutional Review Board (IRB) approval for all data collection under this contract. The Urban Institute developed, and its IRB approved, a confidentiality pledge. All researchers working with the data will read and sign the confidentiality pledge, agreeing to adhere to the data security procedures laid out in the approved IRB submission. The contractor will safeguard all data, and only authorized users will have access to them.

Information gathered for this study will be made available only to researchers authorized to work on the study. Information will not be maintained in a paper or electronic system from which data are directly retrieved by an individuals' personal identifiers.

***Assurances of Privacy***

Survey respondents will be told the purposes for which the information is collected, and that any identifiable information about them will not be used or disclosed for any other purpose, except under such circumstances as may be required by law. Respondents will be given this assurance during recruitment (attachments B.1-B.2), and in the survey instruments (attachments A.7 and A.9). Respondents will be informed that participation is voluntary, that they may refuse to answer any question, and that they may stop their participation at any time.

For interviews with agency heads and staff, Urban will use the informed consent documents attached to each interview protocol (attachments A.6, A.8, A.10, and A.11), as

well as an information document given to each respondent (attachment A.13) to obtain consent for participation in the study. These forms detail the risks and benefits of participating and the expected privacy for each participant. These respondents are not in categories designated as vulnerable populations, and the information the evaluation team will collect is not highly sensitive. Because some study participants will be local agency or organization leaders, administrators, or staff members, and because the team will name the sites in our reports, individuals reading the reports may be able to attribute particular information or comments to those respondents. The evaluation team will inform respondents about this potential risk.

For interviews with youth who are participating in the demonstration, Urban will use the informed consent for participants included with the interview protocol for youth (attachment A.12) and an information document to be given to the youth participant at the time of the interview (attachment A.14). The consent statement and information document detail the risks and benefits of participating and the level of expected privacy for each participant. Although there are some sensitive questions that will be asked, the questions primarily revolve around the youth's experience with the FUP-FSS demonstration. Youth will be informed that they may choose not to answer any or all questions during the interview.

The project team will rely on agency leaders and staff at each site to identify and recruit youth for interviews and in some circumstances to provide the physical space for the discussions. Interviews may be conducted in alternative locations if they are requested as more convenient for youth (such as a coffee shop, public library, their home, or workplace). As directed by the research team, agency staff will recruit young adult participants age 18 and older who are participating in the demonstration. The research team will inform agency

staff of the purpose of the interviews so staff are prepared to answer questions posed by prospective youth interview participants. Researchers will also provide program staff with a project overview (attachment A.1) and an informational fact sheet (attachment A.2) to aid with recruitment that will describe the purpose of the study and address other logistical questions, along with an outreach email and phone script for staff to use to recruit youth (attachments A.3-A.4).

Agency staff will collect and maintain any contact information necessary for recruitment and to coordinate with youth interview participants. The research team members will not collect or receive any contact information for youth interview participants without the participants' permission. Note that the agency staff who help with recruitment may be physically present at the sites of the youth interviews when the interviews are held to help with access to the building and other logistics but will not be permitted to observe the interviews themselves. Information will not be retained in a paper or electronic system from which they are directly retrieved by an individual's personal identifiers.

### ***Data Security and Monitoring***

The Urban Institute will have a data security plan that outlines how the project will store, transfer and destroy sensitive information as well as the precautions to be taken during each of these activities to ensure the security of those data. The contractor has a secure server for a web-based data collection, utilizing its existing and continuously tested web-based survey infrastructure. The infrastructure features the use of HTTPS (secure socket, encrypted) data communication; authentication (login and password); firewalls; and multiple layers of servers, all implemented on a mixture of platforms and systems to minimize vulnerability to security breaches. Hosting on an HTTPS site ensures that data are transmitted using 128-bit

encryption, so that transmissions intercepted by unauthorized users cannot be read as plain text. This security measure is in addition to standard password authentication that precludes unauthorized users from accessing the web application. The contractor has established data security plans for handling all data during all phases of survey execution and data processing for the surveys it conducts. Its existing plans meet the requirements of U.S. federal government agencies and are continually reviewed in the light of new government requirements and survey needs. Such security is based on (1) exacting company policy promulgated by the highest corporate officers in consultation with systems staff and outside consultants, (2) a secure systems infrastructure that is continually monitored and evaluated with respect to security risks, and (3) secure work practices of an informed staff that take all necessary precautions when dealing with private data.

- 3. 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.**

There are no sensitive questions that will be asked of agency heads and staff. The only sensitive questions that will be asked as a part of the data collection are in the protocol for the interviews with youth participating in the demonstration (attachment A.12). The goal of these interviews with youth is to understand how they have experienced the FUP-FSS demonstration, including what services they received and how the demonstration has affected their lives. All sensitive questions are asked purely in the context of how the youth experience the demonstration. These questions will be used to describe the demonstration from the youths' perspectives. The sensitive questions ask youth to describe challenges to

housing stability and self-sufficiency. Specifically, the protocol covers youths' experience with finding and sustaining housing, with setting and achieving self-sufficiency goals, and whether or how the demonstration has impacted their ability to be self-sufficient.

Before starting the youth interviews, all respondents will be informed that their identities will be kept private and that they do not have to answer any question that makes them uncomfortable. Although some questions may be sensitive for some respondents, they have been successfully asked of similar respondents in other data collection efforts, such as in the in-depth parent interviews conducted for the supportive housing study of child welfare involved families (Cunningham et al., 2014).

**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;**
- **if this request covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I; and**
- **provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.**

Table 1 demonstrates the projected burden hour estimates for data collection for the web-based survey with both PHAs and PCWAs, as well as one-time phone and in-person interviews with PHA, PCWA, and community service provider staff, and interviews with youth participants. These estimates assume the maximum possible number of study

participants. The estimates included in Table 1 are based on estimates for the time needs to complete these data collection activities. The total annual cost burden to respondents is approximately \$3,995.70.

For the web-based program survey of PHAs, we assume that the contact person (likely the Housing Choice Voucher Program manager, a case manager, or FUP liaison and/or the FSS grant manager or FSS coordinator) earns approximately \$34.46 per hour.<sup>1</sup> For 51 respondents (one per PHA) taking 30 minutes to complete the survey, the total cost would be \$878.73. For the web-based program survey of PCWAs, we assume that the likely respondent – the FUP liaison – earns approximately \$34.46 per hour.<sup>2</sup> For the 51 PCWAs in the demonstration to complete the 30-minute survey, the total cost would also be \$878.73. The project team will also conduct phone interviews with ten sites and visits to three sites in the FUP-FSS demonstration. This data collection includes 41 phone and in-person interviews with PHA staff. For these 41 respondents, likely a similar population as those completing the survey, we assume an hourly rate of \$34.46 for one hour, resulting in a total cost of \$1,412.86.<sup>3</sup> We will also complete phone and in-person interviews with 16 PCWA staff, likely FUP liaisons, where we again assume an hourly rate of \$34.46 for one hour, resulting in a total cost \$551.36.<sup>4</sup> During site visits we assume we will also conduct one-hour in-person interviews with community service provider staff, where we assume an hourly rate of \$23.92 for a total cost of \$143.52.<sup>5</sup>

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<sup>1</sup> “Occupational Employment Statistics: Occupational Employment and Wages, May 2018 – Social and Community Service Managers,” Bureau of Labor Statistics, accessed December 6<sup>th</sup>, 2019, <https://www.bls.gov/oes/current/oes119151.htm>.

<sup>2</sup> Ibid.

<sup>3</sup> Ibid.

<sup>4</sup> Ibid.

<sup>5</sup> “Occupational Employment Statistics: Occupational Employment and Wages, May 2018 – Child, Family and Social Workers,” Bureau of Labor Statistics, accessed December 6<sup>th</sup>, 2019, <https://www.bls.gov/oes/current/oes211021.htm>.

Lastly, we will conduct interviews with youth participating in the demonstration (6 per site visit, 18 total), where we assume an hourly wage of \$7.25 (federal minimum wage) for a total cost of \$130.50.

**TABLE 1**  
*Burden Estimates*

<i>Instrument</i>	<i>Number of Respondents</i>	<i>Frequency of Response</i>	<i>Responses per Annum</i>	<i>Burden Hour Per Response</i>	<i>Total Burden Hours</i>	<i>Hourly Cost per Response</i>	<i>Cost</i>
Web-based Agency Survey – PHA	51	1	51	0.5	25.5	\$34.46 <sup>6</sup>	\$878.73
Web-based Agency Survey – PCWA	51	1	51	0.5	25.5	\$34.46 <sup>6</sup>	\$878.73
PHA staff interviews	41	1	41	1	41	\$34.46 <sup>6</sup>	\$1,412.86
PCWA staff interviews	16	1	16	1	16	\$34.46 <sup>6</sup>	\$551.36
Community service provider staff interviews	3	1	3	1	3	\$23.92 <sup>7</sup>	\$71.76
CoC staff interviews	3	1	3	1	3	\$23.92 <sup>7</sup>	\$71.76
Youth participant interviews	18	1	18	1	18	\$7.25 <sup>8</sup>	\$130.50
<b>Total</b>			183		132		\$3,995.70

<sup>6</sup> “Occupational Employment Statistics: Occupational Employment and Wages, May 2018 – Social and Community Service Managers,” Bureau of Labor Statistics, accessed December 6th, 2019, <https://www.bls.gov/oes/current/oes119151.htm>.

<sup>7</sup> “Occupational Employment Statistics: Occupational Employment and Wages, May 2018 – Child, Family and Social Workers,” Bureau of Labor Statistics, accessed December 6th, 2019, <https://www.bls.gov/oes/current/oes211021.htm>.

<sup>8</sup> For youth interviews, we assume an hourly wage of \$7.25, the federal minimum wage.



**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.**

This data collection effort involves no recordkeeping or reporting costs for respondents other than the time burden to respond to questions on the data collection instruments as described in item 12 above. There is no known additional cost burden to the respondents.

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The estimated cost to the federal government for the planned FUP-FSS demonstration evaluation and participant data collection totals \$217,610 over a six-month period. The data collection costs are one-time costs based on a competitively awarded contract.

<b>Task</b>	<b>Cost</b>
PHA/PCWA Surveys	\$105,488
Phone Interviews	\$34,502
Site Visits / Participant Interviews	\$77,620
<b>Total:</b>	<b>\$217,610</b>

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

This submission is a new request for approval; there is no change in burden.

**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.**

Table 2 shows the report schedule for this project.

*TABLE 2  
Project Timeline*

<b>Task</b>	<b>Description</b>	<b>Timeframe (after OMB approval)</b>
Web-based survey	Surveys of staff at the PHAs and PCWAs	April-May 2020
Phone interviews	Phone interviews with program managers at the PHAs and PCWAs	June-July 2020
Site visits	Interviews with agency heads, program managers, and service providers; Interviews with youth participants	August-September 2020
Final paper	Drafting and release of final paper	November 2020-February 2021

**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.**

The expiration date for OMB approval will be displayed on all 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.

**References**

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**Attachments**

Attachment A.1 – Project Overview for Agency Staff Recruitment Emails

Attachment A.2 – Project Fact Sheet for Youth Recruitment by Agency Staff

Attachment A.3 – Youth Outreach Email

Attachment A.4 – Youth Outreach Phone Script

Attachment A.5 – Staff Outreach Email

Attachment A.6 – PHA Interview Protocol

Attachment A.7 – PHA Survey Instrument

Attachment A.8 – PCWA Interview Protocol

Attachment A.9 – PCWA Survey Instrument

Attachment A.10 – Continuum of Care Administrators Interview Protocol

Attachment A.11 – Community Service Provider Interview Protocol

Attachment A.12 – Youth Participant Interview Protocol

Attachment A.13 – Information about Participating in an Interview for the FUP-FSS Demonstration Evaluation

Attachment A.14 – Information about the FUP-FSS Demonstration Study for Youth Interview Participants