

**Supporting Statement for Paperwork Reduction Act Submission  
Family Self Sufficiency (FSS) Evaluation – Long-Term Follow-Up Survey  
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.**

This Supporting Statement provides information on the proposed Family Self-Sufficiency program (FSS) long-term follow-up effort to further determine the effectiveness of FSS. It builds upon the baseline and interim follow-up data already collected and on the ongoing collection of data

The primary goal of the Family Self-Sufficiency evaluation is to build evidence about the program’s effectiveness at helping housing-assisted populations secure and maintain employment and gain independence from public support programs. In 2018, at the end of the base evaluation, U.S. Department of Housing and Urban Development (HUD) awarded MDRC an extension to continue the evaluation effort through September 2021, allowing the study to follow participants through the end of their FSS contracts and examine the following types of questions: How do FSS participants fare over the full length of the five-year FSS program? What is the program’s longer-term effect on employment, earnings, and housing assistance outcomes? What are its benefits and costs? What are the program experiences, graduation rates, and escrow disbursements for FSS participants? What are the circumstances of the FSS “exiters”? The long-term follow-up Survey, the focus of this OMB package, will be the main data source for a number of the long-term outcomes that are hypothesized in the FSS Model that cannot be measured using administrative records alone. These include, for example, material hardship, perceived financial well-being, employment characteristics and educational attainment.

**Additional background on the FSS evaluation**

The MDRC-led FSS evaluation is structured around three research components: an impact analysis, an implementation and participation analysis, and a cost analysis. The evaluation design is more fully described in the initial OMB submission package.

The study is designed as a two-group randomized control trial (RCT) involving 2,556 households across 18 public housing agencies (PHAs or sites). Participants were randomly assigned to one of two groups:

- **FSS group.** These individuals have access to the FSS program’s case management and escrow account.
- **Control group.** These individuals will not be enrolled in FSS and will not have access to FSS case management or escrow for 3 years following random assignment.

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

### **Contribution of the FSS long-term follow-up survey**

The longer-term follow-up survey, the subject of this OMB submission, is critical for understanding the program's effects over an extended period, especially after the program has ended for most study participants. In addition to helping examine program effects, the survey will also be used to understand the post-program experiences of former FSS participants, some of whom may have graduated from the program and received an escrow disbursement.

The survey-based impact analysis will draw on questions administered to both the program and control group participants to examine the program's effects on a wide range of outcomes, some of which can only be determined through use of a survey. Key clusters of outcomes for this study are included below.

- **Use of services and attainment of educational or occupational credentials.** MDRC will use the survey to collect data on FSS and control group members' recent use of job search, education and training, and financial counseling services – both within the FSS program (for FSS group members) and alternative services and education and training programs in their communities. Discussions with PHAs have revealed that some programs take a human capital development approach to self-sufficiency and thus emphasize degree, diploma, and certification achievement. Further, participants may achieve some of their education-focused goals further out in their FSS engagement period, which the longer-term survey may capture. MDRC will continue to track educational attainment and receipt of occupational credentials among study participants of both research groups through FSS long-term follow-up survey data.
- **Employment and earnings:** MDRC will use the survey to supplement findings on the FSS program's effects on employment and earnings, calculated with quarterly Unemployment Insurance (UI) wage records from the National Directory of New Hires (NDNH) database. MDRC will collect survey data on recent employment and earnings, including self-employment and employment in jobs not covered by NDNH; also, weekly hours of employment, employer-provided benefits, and other job characteristics. The survey will also collect data on respondents' work search behaviors and reasons for not working (including loss of employment due to COVID-19), if currently unemployed.
- **Income, debt, expense, and material hardship:** If FSS increases participants' disposable income, it may help participants accumulate assets and reduce their material hardships. With the longer-term survey data, MDRC will assess the effects of the program on household income, recent changes to income due to COVID-19 and other reasons, household finances and financial behaviors (such as savings, access to credit, and debt reduction, outcomes which several FSS programs focus on). MDRC will also evaluate how the program affects material hardships, including housing-related hardships such as disconnection of phone and utilities, and incidence of food insufficiency. MDRC observed such effects on poverty and hardship in its study of New York City (NYC)'s conditional cash transfer program, which included a

significant housing-assisted population. The longer-term follow-up survey will allow investigation in these potential impacts. Additionally, MDRC will consider how FSS program participants coped with the economic and social hardships resulting from the COVID-19 pandemic relative to their control group counterparts.

- **Program participation:** MDRC will use responses to the FSS long-term follow-up survey to understand FSS group members' experiences in the program. The survey will collect information about FSS program participation status, use of escrow account disbursements (if any), program satisfaction, contact with case managers, conditions that facilitate and hinder the achievement of program goals, and participants' evaluation of the core components of the FSS program. MDRC will use this information to learn how the program effectively served clients and how the program could be improved upon to better support participants' success in the FSS program.

This study was authorized under the Consolidated Appropriations Act, 2010, Pub. Law 111-117, 123 Stat. 3034, which was approved on Dec. 16, 2009. This evaluation is being conducted by MDRC and its subcontractor M. Davis, on behalf of HUD.

**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 findings from the study will be used to inform the Federal government, PHAs and other stakeholders about the longer-term effects of FSS in helping HCV holders secure and maintain employment and achieve self-sufficiency.

As a study commissioned by HUD, HUD will use the information from this and other data collection efforts over the full evaluation to assess the impacts of the FSS program. As the first national evaluation to assess the effects of FSS, these data will be important for HUD to begin answering questions about whether FSS makes a difference and helps achieve HUD's self-sufficiency goals. The comprehensive study will speak to the program's impacts in multiple domains – for example, housing assistance, self-sufficiency, material hardship, and financial wellbeing.

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

**Items included in the long-term follow-up survey**

This section provides an overview of the items included in the FSS long-term follow-up survey. The complete survey instrument is presented as Appendix A of this document.

In developing the survey instrument, MDRC attempted to balance the need to capture all of the required data against placing undue burden on the respondents, excluding items that—while potentially interesting—are not critical to the measurement of outcomes needed to analyze the longer-term impacts of the FSS intervention. Given the COVID-19 environment, MDRC found it important to include questions that would seek to capture the health-related, economic, and social effects that respondents experienced or continue to experience as a result of the pandemic. In order to prevent placing an undue burden on the respondents, MDRC tried to keep the time needed for survey administration to a reasonable duration. This section provides a brief overview of the content of the follow-up survey.

The survey will include questions concerning respondents' current situation at the time of their interview and other questions that focus on the period between study enrollment and the time of the long-term follow-up survey or during the 12 months prior to interview.

The survey is structured around 6 modules, covering the following broad topics:

**Participation in employment, education, and social services**

Courses, trainings, and programs attended

**Educational attainment**

Degrees, licenses, and certifications received

**Employment**

Employment and job characteristics during the follow-up period

Changes in employment due to the COVID-19 pandemic

**Income, debt, expenses, and material hardship**

Earnings at the time of the follow-up survey

Income sources; total family income

Amounts of savings and debt

Use of alternative financial service providers (e.g. check cashers, payday lending)

Economic stressors: material hardship, income instability, emergency expenses

Food security

Health insurance coverage and health status

**Housing**

Current housing status and recent changes in housing status

Housing expenses (e.g. rent and utility payments)

**Program participation (program group only)**

For program group members enrolled in FSS at the time of survey

Conditions that facilitate and hinder the achievement of program goals

Escrow accumulation and intended use of escrow

Contacts and case management experiences

Evaluation of the core components of the FSS program

For program group members who have exited or graduated FSS at the time of survey

Conditions that facilitate and hinder the achievement of program goals

Escrow accumulation and use of escrow (if applicable)

Contacts and case management experiences

Evaluation of the core components of the FSS program

Reason for leaving the program

Conditions that supported or could have supported program graduation

### **Who will collect the information?**

M Davis and Company (MDAC), the survey subcontractor to MDRC for the national evaluation, will administer and field the follow-up survey. The survey will be administered to a fielded sample of 1,300 study group members, split evenly between FSS (program) and control group members. The survey will primarily be web-based and self-administered but will have a computer-assisted telephone interview (CATI) for the non-respondents to the online version. Both surveys will use the same questionnaire, with slight modifications to facilitate completion of the survey online or by telephone. The follow-up survey should take approximately 18 to 20 minutes to complete. MDAC will administer a Spanish-language version of the survey (online and CATI) for respondents who speak Spanish as their primary language.

### **Informed consent**

Study participants completed a participation agreement when they enrolled in the study, providing their informed consent to participate in the research study. The original participation agreement allows for the collection and retention of data on study participants for up to 10 years after random assignment and names MDAC as a research partner to be authorized by the participant to collect data for the study. A copy of the Informed Consent Form administered at baseline can be found in Appendix C of this submission. In addition, MDAC includes language in the opening script of the survey that asks for and records the respondent's consent to be interviewed and other language that assures the respondent that he or she may forgo answering any question that he or she does not wish to answer.

- 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 long-term follow-up survey will feature a multi-mode approach, using both a self-administered web-based option and a CATI option. Both approaches are computer assisted interviews.

Wherever possible, advanced technology will be used in data collection efforts to reduce burden on study participants and on-site staff. The following methods will be used:

- 1) **Self-administered web-based survey.** This helps to reduce the burden on study participants by allowing participants to take the survey at their convenience and reducing the length of the interview. The web-based survey is coded to enable respondents to avoid inappropriate or non-applicable questions. The web-based survey 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.
- 2) **CATI.** This helps to reduce respondent burden, as interviewers can proceed more quickly and accurately through the survey instruments, minimizing the interview length and the need for subsequent call backs. Computer programs enable respondents to avoid inappropriate or non-applicable questions. Key data will be pre-loaded on the survey based on response to previous survey questions (in the same survey) and where applicable, at baseline). CATI 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.<sup>1</sup>
- 3) **We will utilize survey tracking information.** MDRC collects contact information annually from participating housing authorities and from federal HUD database. MDRC is forwarding the information to M Davis and Company (MDAC). Address changes come from mailings to the participants and passively tracking respondents through the U.S. Postal Service Change of Address database (this approach provides an inexpensive method for being able to collect more recent contact information for respondents).
- 4) **Integration of other data sources.** When relevant person-level data has been identified as available through an accessible centralized, computerized source, the information has generally been excluded from the proposed data collection package. For example, quarterly employment and earnings data will be obtained through administrative records and data on HUD-subsidized housing outcomes, including Housing Choice Voucher program exits, will be obtained from HUD records. While implementation data collection relies on evaluation staff efforts on-site, we have sought wherever possible to minimize overlap between questions we include in implementation questionnaires and protocols and questions that will be asked through computer-assisted surveys. Survey responses add detail to administrative data (for example, by providing information on hours of work per week) and collect information not covered by administrative data, such as self-employment or residence in private housing, not subsidized by HUD. Importantly, the FSS group members'

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<sup>1</sup> Another benefit of CATI is that interviewers can focus on the respondent rather than management of the survey instrument, creating a more pleasant experience for the respondent. The technology ensures that scheduled appointments are honored with respondents. CATI also ensures adherence to dialing protocols, maintaining the integrity of the study without unduly burdening sample members and eliminates many human errors, such as accidental calling of resolved sample records. Finally, CATI provides translated scripts for crisp script delivery to non-English speakers.

responses to questions on FSS program participations provide critical information on how the program functioned from participants' point of view.

**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 information collection will not duplicate information that is already available through other administrative agency data sources, such as: National Directory of New Hires (NDNH) quarterly wage records and tenant data reported by the PHA to HUD into the Inventory Management System (IMS) Public and Indian Housing (PIH) Information Center (PIC) system. Also, MDRC will rely on credit score data from a major credit bureau, rather than asking respondents to recall changes in their scores. The survey will collect data that are not available through these data sources. For example, the evaluation will use the survey to example job characteristic and work circumstances, which cannot be gained from the NDNH data.

**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.**

All survey respondents will be individuals enrolled in the FSS study. We do not anticipate that this study will burden small businesses.

**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.**

This evaluation represents an important opportunity for the Federal Government to add to the body of knowledge about the impacts of a key employment-oriented program for HCV recipients. This is consistent with the Administration's strong focus on evidence-based policymaking. With the exception of the Work Rewards demonstration, there is no rigorous impact evaluation of the FSS program, which operates nationwide.

Without this survey, the Federal program or related policy activities will not be informed by high quality evidence on a variety of longer-term outcomes central to the FSS intervention. Limiting analysis to only those outcomes available through administrative records will lack the richness and comprehensiveness that the longer-term survey will provide.

**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.

Please see Appendix B for a copy of the HUD's notice in the Federal Register, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.

The notice appeared on page 16649, Vol. 85, No. 57, Tuesday, March 24, 2020.

a. Consultations

The survey instrument has been reviewed by HUD staff. HUD also requested and provided the research team with input from an external reviewer, Jeffrey Lubell, at Abt Associates.

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

MDAC will offer an incentive of \$30 to respondents who complete the long-term follow-up survey as a token of appreciation for donating their time. To enhance the response rate, we will offer an increased incentive of \$50 at the tail end of the data collection window for any outstanding non-respondents.

The respondent payments and justification for each proposed instrument are outlined below. During this stage of the evaluation one type of payment to respondents is planned: payment will be distributed upon survey completion. Justification for this payment is provided below.

Payment upon completion of the survey. Payment upon survey completion is intended as a token of appreciation. As documented in the literature, this token of appreciation is likely to improve response rates by decreasing the number of refusals, enhancing respondent retention, and providing a gesture of goodwill to acknowledge respondent burdens. This technique is proposed in addition to many of the techniques suggested by OMB to improve response rates that have been incorporated into our data collection effort and are described in Section B3 (see Supporting Statement B), because our experience has shown that small monetary amounts are useful when fielding data collection instruments with low-income and/or hard-to-reach populations as part of a complex study design. In a seminal meta-analysis, Singer, et al. (1999) found that incentives in face-to-face and telephone surveys were effective at increasing response rates, with a one dollar increase in incentive resulting in approximately a one-third of a percentage point increase in response rate, on average. They found some evidence that incentives were useful in boosting response rates among

underrepresented demographic groups, such as low-income and non-white individuals.<sup>2</sup> This is a significant consideration for this study. Another important consideration is the burden posed by this data collection, which will take on average 18-20 minutes of the participant's time for the follow-up survey.

The survey instrument that will be used to collect follow-up data from sample members has unique aspects that make administration difficult and potentially threaten response rates. We are therefore requesting approval to offer a small monetary amount (\$30) to all sample members who complete the survey. Aspects of the data collection effort that also make it more difficult for surveys of low-income households to obtain high completion rates are:

- The surveys include questions that could be perceived as intrusive and therefore could make respondents uncomfortable (i.e., questions about their finances, which are topics discussed with FSS case managers).
- Participants may have negative feelings about program services, which are of interest, such as case management services, job training, etc.
- Response rates can be lower for educationally and economically disadvantaged groups, who may be more difficult than the general population to convince to participate in surveys.

We are aiming to achieve a 60 to 70 percent survey completion rate. Even with the best data collection practices, it would be very difficult, if not impossible, to obtain such a high completion rate without providing a token of appreciation to participants.

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

Every effort will be made to maintain the privacy of respondents, to the extent permitted by law. Please see the informed consent form used during baseline data collection (and approved as part of the previous OMB submission) in Appendix C. All respondents included in the study were informed that information they provide will be used only for the purpose of this research. Individuals will not be cited as sources of information in prepared reports. All research staff working on the project have been trained to protect private information and have signed a pledge stating that they will keep all information gathered private to the extent permissible by law. All papers that contain participant names or other identifying information will be kept in locked areas and any computer documents containing identifying information will be stored in strongly limited-access network directories and protected with a password. The Research Design and Data Collection and Analysis Plan prepared for this study provides additional information on how evaluation data will be protected. It is available on request.

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<sup>2</sup> Berlin, M., L. Mohadjer and J. Waksberg (1992). An experiment in monetary incentives. *Proceedings of the Survey Research Section of the American Statistical Association*, 393-398; de Heer, W. and E. de Leeuw. "Trends in household survey non-response: A longitudinal and international comparison." In *Survey Non-response*, edited by R. M. Groves, D. A. Dillman, J. L. Eltinge, and R. J. A. Little. New York: John Wiley, 2002, pp.41-54; Singer, E. and Kulka, R. *Studies of Welfare Populations: Data Collection and Research Issues*, Panel on Data and Methods for Measuring the Effects of Changes in Social Welfare Programs. Ploeg, Robert A. Moffitt, and Constance F. Citro, Editors. National Academies Press, Washington, DC, 2000, pp. 105-128.

**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.**

Many of the questions envisioned for the survey are potentially sensitive for respondents, but they include questions covering information generally collected from program participants at the time of enrollment in FSS or in follow-up surveys or discussions with case managers. Respondents are asked about topics about potential barriers to employment or goal attainment (for example, poor credit, childcare difficulties, debt, and limited educational attainment) and, depending on the FSS program, these topics are addressed directly by program case managers, in service referrals, and in participants' "independence plans." Respondents will be informed by survey staff prior to the start of the survey that their answers are confidential, that they may refuse to answer any question, that results will only be reported in the aggregate, and that their responses will not have any effect on any services or benefits they or their family members receive. The survey contains no questions on sexual behavior or attitudes, substance use, or religious beliefs.

**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.**

The hour burden for the data collection for participants is outlined in Table 1 below. The estimates included below are based on experience with previous random assignment studies involving similar populations and data collection instruments. The instrument for this collection was designed by MDRC and is included as Appendix C in this packet.

**Table 1**

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Cost
<b>Total</b>	1,300.00	1 .00	1,300.00	0.33 <sup>3</sup>	429	\$9.87 <sup>4</sup>	\$4,234.23 <sup>5</sup>

## Hours and Burden

### Members of the affected public:

Families receiving subsidized housing and enrolled in the FSS program (treatment group):	650
Families receiving subsidized housing and not enrolled in the FSS program (control group):	650

### Estimation of the total number of hours needed to prepare the information collection including number of respondents, frequency of response, and hours of response:

Instrument	Number of Respondents	Number responses per respondent	Average burden/response (in hours)	Total burden hours
FSS long-term follow-up	1,300	1	0.33 (20 minutes)	429

### 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;

<sup>3</sup> Based on HUD feedback and suggestions on the instrument, the survey might run between 18-20 minutes, slightly longer than the 15-minute estimate in the Federal notice.

<sup>4</sup> To compute the hourly cost per response, MDRC used the weighted average state minimum wage of the 18 study sites, as of October 1, 2020. The state minimum wages were weighted by the number of study participants in each state. State minimum wage rates were found on the DOL website (<https://www.dol.gov/agencies/whd/minimum-wage/>). The minimum wages in 7 states are: California (\$12.00), Florida (\$8.56), Maryland (\$11.00), Missouri (\$9.45), New Jersey (\$11.00), Ohio (\$7.25), and Texas (\$7.25).

<sup>5</sup> To compute the total estimated annual cost, the total estimated annual burden hours were multiplied by the hourly cost per response. The calculation assumes 429 total annual burden hours if all 1,300 study participants respond to the survey.

- 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.

The respondents to the long-term follow-up survey are FSS study group members. MDRC computed the hourly cost per response by using the average state minimum wage of the 18 study sites, as of October 1, 2020. MDRC computed a weighted average minimum wage using the 7 state minimum wages across the 18 sites. The computed hourly cost per response is \$9.87. To compute the total estimated annual cost, the total estimated burden hours was multiplied by the hourly cost per response. The calculation assumes 429 total burden hours and a total estimated annual cost of \$4,234.23 if all 1,300 study participants respond to the survey. The proposed data collection will not require the respondents to purchase equipment or services. Therefore, there are no additional costs to respondents.

Minimum wage by state		Computed hourly cost per response	Total burden hours	Total estimated annual cost
California	\$12.00	\$9.87	429	\$4,234.23
Florida	\$8.56			
Maryland	\$11.00			
Missouri	\$9.45			
New Jersey	\$11.00			
Ohio	\$7.25			
Texas	\$7.25			

**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 total cost to the Federal Government for this survey effort, which is part of a broader evaluation effort led by MDRC, is \$296,828. The table below summarizes the projected costs of MDAC’s survey data collection effort.

<b>Title</b>	<b>Estimated Hours</b>
Project Manager	308
Researcher	225
Call Center Manager	114
Project Coordinator	130
Call Center Supervisors	222
Interviewers	1,110
Administrative	346
CATI Programmer/Database Admin	248
Research Assistant	604
Accounting	20
<b>Labor Hours</b>	<b>3,327</b>
<b>Direct Labor Cost</b>	<b>\$95,937</b>
Consultants	\$3,422
Licenses (Lexis Nexis)	\$18,930
Printing/Supplies	\$4,200
Telephone	\$2,480
Incentives	\$40,850
Postage	\$1,859
Overhead	\$52,084
Fees	\$14,867
G&A	\$62,199
<b>Total Costs</b>	<b>\$296,828</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.

**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.**

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

The evaluation data will be analyzed from 2019 to 2021. Table 2 below shows deadlines for the completion of key project tasks. As shown in Table 2, MDRC intends to produce two formal deliverables drawing on the various data sources.

**Table 2:  
Analysis and Publication Schedule**

<b>Task</b>	<b>Deliverables</b>	<b>Date</b>
<b>Option 1 Tasks</b>		
Data Collection and Analysis		
	Analysis Period	10/1/19 – 09/25/2020
Data Files and Documentation		
	Interim Report - 60 months post random assignment	
	1st Draft	09/01/2020
	2 <sup>nd</sup> draft	TBD pending HUD feedback
	Final Data Files/Documentation	9/25/2020
<b>Option 2 Tasks</b>		
Data Collection and Analysis		
	Analysis	10/2020-7/2021
Data Files and Documentation		
	Final Report - 72 months post random assignment	
	1st Draft	4/10/2021
	Final Version	7/31/2021
	Final Data Files/Documentation	9/11/2021

**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.