

Supporting Statement Part A for Paperwork Reduction Act Submission
Evaluation of the HUD-DOJ Pay for Success Re-Entry Permanent Supportive Housing
Demonstration
OMB # 2528-0319

Part 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 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 as deemed to be necessary and appropriate (12 USC 1701z-1 et seq.).

The U.S. Departments of Housing and Urban Development (HUD) and the Department of Justice (DOJ) entered into an innovative interagency collaboration that combines DOJ's mission to promote safer communities by focusing on the reentry population with HUD's mission to end chronic homelessness. This collaboration resulted in the Pay for Success Permanent Supportive Housing Demonstration, with \$8.68M awarded in June 2016 to seven communities to develop supportive housing for persons cycling between the jail or prison systems using Pay for Success (PFS) as a funding mechanism. The PFS Demonstration grant supports activities throughout the PFS lifecycle, including feasibility analysis, transaction structuring, and outcome evaluation and success payments, with each grantee receiving funds for different phases in the PFS lifecycle.

Accompanying this Demonstration, HUD and DOJ funded a national evaluation to assess whether PFS is a viable model for scaling supportive housing in order to improve outcomes for a re-entry population. The evaluation, launched in January 2017, is funded through an interagency agreement and is managed by HUD's Office of Policy Development and Research. The overarching goal of this formative evaluation is to learn how the PFS model is implemented in diverse settings with different structures, populations, and community contexts. The Urban Institute has designed a multi-disciplinary, multi-method process study to "learn as we do" and meet the key objectives of the formative evaluation.

This information collection renewal request concerns two specific data collection activities that are part of the national evaluation: (A) an Annual Partnership Survey is focused on the development and functioning of partnerships and community-level collaborations that may benefit the target population. (B) a Time Use Study Data Collection is being conducted as part of a study of the staff time that is used to develop each PFS project, through the phases of its PFS life cycle of feasibility analysis, transaction structuring, and project implementation.

The national evaluation also includes other activities not discussed in this package, including annual site visits involving semi-structured interviews with key stakeholders and observation of partnership meetings, monthly calls to discuss implementation progress and successes and challenges encountered, and review of key site documents.

Annual Partnership Survey

Research Objective

At the center of PFS's theory of change is that it acts as an instrument to bring cross-sector partners together to work strategically and collaboratively across silos to achieve better outcomes for a vulnerable population. There are many reasons a PFS project may not complete its full lifecycle, but, in the case of an early termination, the PFS process itself may still yield real benefits to project partners and, by extension, the target population. This can occur, for instance, through improved collaboration and agreement on outcome priorities, better use of data in decision-making, and a clearer understanding of challenges and opportunities for intervention.

Specifically, the following research questions will be answered:

- Throughout the PFS lifecycle, how do PFS partner perceptions and interactions change, and how do partners' "business as usual" activities and strategies change in ways that benefit the target population? This inquiry includes questions regarding community support for interventions for the target population, collaboration among service providers and local systems of care, data sharing, resource sharing, and performance evaluation.
- In implementation, how do PFS projects improve the effective collaboration among partners working with the target population, particularly in terms of better sharing of information among service providers, attention to the needs of and improved access to services for the target population, better program performance, and improved sustainability planning.

Data Collection Methods

To understand whether the PFS projects funded through the Demonstration are realizing these types of benefits, the research team is collecting an annual survey of stakeholders on community collaboration, data sharing, and service provision, administered through an on-line platform, Qualtrics, or if participants prefer, through a paper survey.

Time Use Study Data Collection

Research Objective

One of the evaluation's research objectives is to document the time costs incurred by Demonstration grantees and their partners as they move through the PFS phases: feasibility assessment, transaction structuring, and implementation. (Costs of developing a PFS project are distinguished here from the programmatic costs of designing and implementing the permanent supportive housing (PSH) intervention, which include housing and service provision.) The most

significant PFS-specific costs are related to staff time. Time is needed for intensive engagement with partners, including educating partners about the project and the PFS process and bringing partners from different sectors to the table; collecting and combining data from different sources; conducting feasibility assessments; structuring the transaction; finding and securing end payors and investors; and maintaining engagement with all parties throughout the process.

Emerging findings from the ongoing process study have indicated that some grantees are spending more time on PFS-specific elements of the project at each phase than their budgeted costs covered by their HUD grants. The feasibility analysis and transaction structuring phases require involvement from a broad set of partners, including individuals whose time is not billed to the project grant. During project implementation as well, PFS requires the continued involvement of a set of partners in activities such as oversight and monitoring. Changes may also be needed to the design of the intervention based on early implementation results; in a PFS project, this can necessitate the renegotiation of the contract formed in the transaction structuring phase. Many of these activities involve a time commitment that would not be expected for implementing PSH outside the PFS structure.

The goal of this data collection activity is to describe those time costs for the PFS process, and across the PFS phases. Research is limited in this area. PFS has not previously been used in a consistent manner to support PSH on the scale of this initiative, so that the initiative provides an important opportunity to assess the time costs of the PFS process.

Specifically, the Time Use Study aims to answer:

- How much time do partners spend on developing the PFS PSH project in each lifecycle phase? How does this vary by site?
- During each PFS lifecycle phase, which partners are spending the most time on the development of the project? What level of staff is working on the project? How does this change over time?

Data Collection Methods

The time use data collection began through a two-pronged approach: supplementing administrative timesheet records with quarterly requests for time use data.

Administrative timesheet records are obtained through the Disaster Recovery Grant Reporting (DRGR) system, which is the system used by grantees to bill their time to HUD under their Demonstration grant. The research team utilizes DRGR administrative data to gain one measure of how much time key stakeholders are spending on this project for the different phases of PFS.

However, DRGR data alone is insufficient to capture adequate, comprehensive time use data. For instance, not all stakeholders are submitting time to DRGR and some stakeholders have observed that their DRGR submissions do not fully capture time spent on the project. Therefore, to supplement DRGR the data collection method includes the use of quarterly outreach to key staff to collect data on time spent on the project.

In the first quarter of data collection, this outreach took the form of qualitative interviews. Many respondents expressed a preference to provide these data via email. (This ran counter to the results of an email outreach pretest for our original data collection OMB request, which indicated that email would not be an effective collection method.) Subsequently, respondents were provided a choice to either participate in a quarterly interview or to provide the same data via an emailed worksheet. To date, almost all respondents use the email option. This renewal request proposes to continue to offer this choice of data collection methods.

Specifically, the following questions will be answered:

- How much time do staff spend on the PFS project?
- For staff with time that is covered by the HUD grant, do they spend significantly more time than the grant covers? How much time do they spend on the project beyond what is covered by the grant?

Then these will be combined with the DRGR records to create a complete picture of time use for the organizations, across the phases of the PFS lifecycle.

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

This data collection is part of the ongoing national evaluation, managed by the Office of Policy Development and Research at HUD, which is designed to help HUD and DOJ assess whether PFS is a viable model for scaling supportive housing to improve outcomes for a re-entry population.

Annual Partnership Survey

This is a renewal request for the Partnership survey – the initial approval covered the first three years of data collection. The first Partnership Survey included perceptions covering Year 2 of the evaluation (2018). There have subsequently been two additional waves covering Year 3 (2019) and an ongoing survey covering Year 4 (2020). Data has been collected through an online survey administered annually by the Urban Institute. The survey is administered to partners in a variety of roles within the grantee and partner organizations participating in the PFS Demonstration. The survey is only available for completion online. The data has been used for analyses of partner perceptions and interactions and community-level changes that may benefit the target population in each Demonstration site. Partnership survey results have been presented in the Year 2 and Year 3 Evaluation Reports, the latter of which is currently undergoing HUD clearance, and will be made public on HUD's website. The Year 2 report is already public on HUD's website.

The survey asks respondents to answer questions that:

- Assess collaboration among partners within the PFS project
- Assess collaboration among partners on shared tasks outside the PFS project
- Provide information on the use of outcome-based procurement
- Provide information on the collection and use of data outside the requirements of the PFS project

Item-by-item justification for the Partnership Survey instrument (Appendix A) is provided in Exhibit A-1.

Exhibit A-1. Item-by-Item Justification of Partnership Survey Instrument

Questions / Topics	Content and justification for inclusion
<p>I. Background Questions 1-7</p>	<p>These questions ask for the respondent’s description of their organization, primary service focus, title or position within their organization, years in their position, number of PFS project meetings attended, and organizational commitment to the primary PFS outcome areas.</p> <p>Together, these questions provide a picture of survey respondents and their organizational focus.</p>
<p>II. Collaboration with partners Questions 8-16</p>	<p>The series of questions asked in this section of the survey captures respondents’ perspectives on the nature, strength, and frequency of partnerships among organizations involved in the PFS project and the community’s overall commitment and capacity to collaborate to serve the PFS project’s target population.</p> <p>The respondents are asked to rate the clarity of different aspects of their PFS project’s goals and roles. Respondents are asked to assess their community’s commitment to and experience serving a chronically homeless jail reentry population. Respondents are asked how much collaboration occurs among various partners in the community that serve the PFS project’s target population. They are asked to assess changes in collaboration among organizations serving the PFS project’s target population. The respondents are asked to rate a range of factors based on how problematic they are for collaboration among organizations that serve the PFS project’s target population. Finally, they are asked to assess how often their organization engages with other partners that serve the PFS project’s target population.</p>

Questions / Topics	Content and justification for inclusion
<p>III. Data sharing, performance data, and focus on outcomes</p> <p>Questions 17- 22</p>	<p>The series of questions asked in this section of the survey captures respondents’ perspectives on how organizations serving the PFS project’s target population share data for program design and management.</p> <p>The respondents are asked to indicate how their community shares data to identify and serve a chronically homeless jail reentry population, as well as how their community uses evidence to develop and manage supportive housing programs for the target population. They are asked to indicate what types of client data their organizations share with other partners to improve service outcomes and how often. They are asked to identify the types of organizations with which they share client data. Finally, they are asked whether outcome-based procurement has become more common as a financing mechanism, outside of the PFS project.</p>
<p>IV. Barriers to Service Provision</p> <p>Questions 23-24</p>	<p>The series of questions asked in this section of the survey captures respondents’ perspectives on the presence of common barriers to serving the target population in their community and how well the community has addressed those barriers.</p> <p>The respondents are asked to rate a range of potential organizational-level and population-level barriers based on how problematic they are for the target populations’ access to services, including resources, regulations, and technology. Finally, they are asked to indicate how well the community has addressed some of the most common system-level barriers to supportive housing for a chronically homeless jail reentry population.</p>
<p>V. Implementation and Sustainability</p> <p>Questions 25-26</p>	<p>The series of questions asked in this section captures respondents’ perspectives on the presence of infrastructure and supports for the project activities that would indicate the sustainability of programming for the target population. Respondents are asked to indicate how solidified the activities are in community leadership, partner organization programming, and long-term financial planning.</p>

Time Use Study Data Collection

Information on time spent not recorded through the DRGR instrument will be collected on a quarterly basis with key staff members at each organization identified in the contact information data collection phase. Each respondent has been asked to report on time spend by staff on PFS planning and implementation. Respondents are offered an option to respond via interview or email. If respondents prefer to respond via email, a spreadsheet is sent containing their prior data, to be updated through the most recent quarter. The information requested is included in Appendix B.

This data collection is not intended to be an audit of the grantees in this Demonstration. The research team is responding to grantees’ acknowledgement that PFS can be a heavy lift. Through the process study, individuals have shared directly that they are spending time outside of what

they can bill to the HUD grant. The PFS field is still emerging; right now, it is only known anecdotally that PFS requires a significant time and monetary commitment. This time use study aims to illuminate what is unknown about the costs of each PFS phase. By being specific about the time and associated costs spent by different sites across the PFS phases, the evaluation will inform other communities' understanding of the potential costs involved in using PFS to implement PSH for a re-entry population.

Time use study results have been presented in the Year 3 Evaluation Report, which is currently undergoing HUD clearance and will be made public on HUD's website.

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.

Annual Partnership Survey

The survey will be administered online using Qualtrics survey software. An online survey was determined to be the most cost-effective method of collecting responses from the community of stakeholders. The survey is designed to be completed online accessible through multiple platforms, such as computer, tablet, and smart phone; a PDF version will be available for download for informational purposes only. No respondent or potential respondent has indicated challenges accessing or completing past surveys due to technical barriers.

Stakeholders will be contacted by email and invited to take the survey. This advance mailing will offer information in large font for individuals with visual impairments and notify individuals with disabilities that they may request reasonable accommodations in order to participate in the study. The Section 508-compliant web survey will offer an alternative to the phone survey for individuals with hearing impairments.

The advance mailer will also detail language assistance options for persons with limited English proficiency. The research team will make the survey available in other languages, as needed, for persons with limited English proficiency. Survey language needs will be determined before the survey is administered so that survey translations can be made available to individuals with limited English proficiency (LEP). In prior waves, the research team did not find any need any individuals in the survey population of stakeholders for the initiative. If LEP needs are discovered, translation services will be engaged to make the survey available in other languages, as needed. HUD's Office of Policy Development and Research has a translation services contractor that can help provide translation services if needed.

Time Use Study Data Collection

The first wave of quarterly data collection on time use was conducted via phone interview. When many respondents indicated, they would prefer to respond via email, respondents were offered a

choice in future waves of phone interview or email. Almost all respondents have continued to select the email option.

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.

No other data source, either public or private, has been identified that provides the type of qualitative information available from the proposed field research interviews. Neither is there similar information available at the local level that could be used or modified for use for the purposes described. Thus, the information collection will not duplicate information that is already available.

Annual Partnership Survey

These surveys are conducted annually. Prior to their invitation to participate in the survey, this information on the benefits and challenges to partnership and collaboration in the previous year is not being collected by the evaluation team or, to the team's knowledge, by others.

Time Use Study Data Collection

While HUD will require the PFS grantees to report out annually on grant activities, accomplishments, and financial summaries and draw downs, HUD's reporting will not be sufficient to ascertain the actual time spent on PFS activities, by whom, and at what staff level and organization type.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Annual Partnership Survey

This collection of information will affect all PFS grantees and their partners participating in the surveys including local/state government agencies, non-profits, and financial organizations. Burden on these entities is minimized by providing clear and concise information on the purpose of our data collection via email, and by conducting all the data collection online via Qualtrics, accessible through multiple platforms, such as computer, tablet, and smart phone.

The survey has been designed to minimize respondent burden; the Partnership Survey pre-testing showed it takes respondents about 15 minutes to complete. Pre-testing helped troubleshoot technical issues that were fixed prior to the launch of the first wave of collection.

Time Use Study Data Collection

To reduce the organizational burden of the quarterly data collection, only one person from each organization identified will be contacted to provide hours spent by organization staff.

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 the burden.

HUD and DOJ entered into an innovative interagency collaboration that resulted in the Pay for Success Permanent Supportive Housing Demonstration with \$8.68M awarded to seven grantees in June 2016. If the proposed data were not collected or not collected as frequently, then HUD and DOJ would not be able meet the evaluation objectives: (1) to learn how the PFS model is implemented in diverse settings with different structures, populations, and community contexts and (2) to assess whether PFS is a viable model for scaling supportive housing to improve outcomes for a re-entry population.

Annual Partnership Survey

The Partnership Survey is administered annually, for the duration of the evaluation. There is no other comprehensive source for this information. This component of the evaluation is necessary to understand the impact of collaboration among the participating organizations and how those partnerships change over time. Without the partnership and community change information obtained from this survey, HUD would not know the benefits of funding permanent supportive housing through a PFS framework. Administering this survey less frequently would affect the reliability of the data.

Time Use Study Data Collection

The only current time data on PFS implementation comes from submissions to HUD's DRGR system, for billing purposes. This system does not capture on every Demonstration organization that is part of the PFS planning and implementation work. There is no current source of data concerning time use beyond staff time is billed to the HUD award. This component of the evaluation is necessary to understand the additional time costs of PFS beyond what is covered by DRGR reporting. Without this information, HUD will not know about the additional costs of funding permanent supportive housing through a PFS framework. Collecting information less frequently would reduce the reliability of the data.

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

- Under this ICR, HUD will not conduct any data collection requiring respondents to report information to the agency more often than quarterly;
- Under this ICR, HUD will not conduct any data collection requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

- Under this ICR, HUD will not conduct any data collection requiring respondents to submit more than an original and two copies of any document;
- Under this ICR, HUD will not conduct any data collection requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- Under this ICR, HUD will not conduct any data collection in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- Under this ICR, HUD will not conduct any data collection requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- Under this ICR, HUD will not conduct any data collection that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- Under this ICR, HUD will not conduct any data collection requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

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.

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.**

- a. Federal Register Notice and Comments

In accordance with 5 CFR § 1320.8 (d), a Notice of Proposed Information Collection for publication in the Federal register was prepared to announce the agency’s intention to request an OMB review of supplemental data collection activities for the Rent Reform Demonstration. HUD published a 60-Day Notice of Proposed Information Collection in the Federal Register on 1/25/2021 (Docket No. FR-7041-N-03, pages, 6913 – 6914. The notice provided a 60-day period for public comments, with comments due March 26, 2021. No public comments have been received. <https://www.federalregister.gov/documents/2021/01/25/2021-01463/60-day-notice-of-proposed-information-collection-evaluation-of-the-hud-doj-pay-for-success-permanent>

- b. Consultations Outside of the Agency

During study design, grantees were consulted to obtain feedback on the proposed data collection in order to reduce burden on grantees and increase clarity of instructions.

Partnership Survey

The Partnership Survey tested survey questions that were adapted from other survey efforts. The survey was tested with 8 respondents representing 4 different sites (Lane County, OR; Austin, TX; Alaska; Los Angeles, CA), and 4 different PFS roles (government, service provider, evaluator, TA provider) across sites to ensure clarity of instructions and data elements to be reported. Feedback on formatting and content was solicited from all testers via e-mail and by phone call. Based on tester feedback, changes were made, including: the addition of a progress bar, removal of ambiguity about when the survey is asking about the PFS project or the broader community, and the addition of questions about benefits of data infrastructure and sustainability.

Time Use Interview

Pre-tests of the two previously proposed methods, a text-message-based survey and the email alternative, initially indicated that neither would achieve an acceptable response rate. In response, the Urban Institute proposed to replace that data collection with quarterly interviews of key informants, to be combined with the use of administrative data. After conducting the first wave of quarterly interviews, respondents requested the option to reply via email. The method was adjusted to offer both methods and to-date the email option has been by far the most often selected mode.

The advance mailing will offer information in large font for individuals with visual impairments and notify individuals with disabilities that they may request reasonable accommodations in

order to participate in the study. A Section 508-compliant email-based data collection will be offered an alternative to the phone survey for individuals with hearing impairments.

The advance mailer will also offer language assistance options for persons with limited English proficiency. Language needs will be determined before data is collected, so that translations can be made available to individuals with limited English proficiency (LEP). In prior waves, the research team did not find any such need for individuals requested to participate in the time use study for the initiative. If LEP needs are discovered, translation services will be engaged to make the survey available in other languages, as needed. HUD's Office of Policy Development and Research has a translation services contractor that can help provide translation services if needed.

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

No incentives, or other payments or gifts, will be offered to survey or interview participants.

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

Before beginning any survey or interview, stakeholders will be provided an explanation of the purpose of the evaluation and how their responses will be used. Respondents will be told that their individual responses will be de-identified and will be publicly reported only in the aggregate. Nonetheless, respondents will also be told that unique roles or responses could be potentially identifying, and therefore confidentiality is not being promised.

The information requested under this collection is protected and held private in accordance with 42 U.S.C. 1306, 20 CFR 401 and 402, 5 U.S.C.552 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act of 1974) and OMB Circular No. A-130. A Privacy Impact Assessment was approved by the Department on 11/17//2017.

In addition, the survey research instruments and interview protocols – specifically the Annual Partnership Survey, and the time use email template – were reviewed and approved by the Urban Institute's Institutional Review Board prior to initiating any research, which operates according to the Common Rule on the Protection of Human Subjects found in Title 45 of the Code of Federal Regulations, Part 46 (45 CFR 46). This IRB review has been renewed annually.

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 people from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature have been included.

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.**

Exhibit A-2 shows the projected burden hour estimates for data collection for the partnership survey of key stakeholders and time use interviews with organization staff. These estimates assume the maximum possible number of study participants. The estimates included in Exhibit A-2 are based on estimates for the time needed to complete these data collection activities. The total annual cost burden to respondents is approximately \$5,441.33, which is the sum of \$1,278.29 for the partnership survey and \$4,163.04 for the time use study.

Annual Partnership Survey

The Partnership Survey will be administered annually to approximately 120 people in management or leadership roles in partner organizations participating in the PFS Demonstration.

The survey was pilot tested with 8 respondents to improve the survey instrument, who were asked to record their start and stop times. Respondents reported the web-based Partnership Survey took less than 15 minutes, and Qualtrics showed the average time to be 13 minutes. Therefore, the burden is estimated at 0.25 hours, and the estimated annual burden for the 120 participants is 30 hours per year.

The typical key project partner role is either a management or support role, and we assume average the hourly wage is \$32.28, which is median hourly wages for Social and Community Services Manager (SOC code 11-9151) in the most recent (May 2019) Bureau of Labor Statistics

Occupational Employment Statistics (BLSOES). For 120 responses taking 0.25 hours once per year multiplied by the \$32.28 hourly wage equals \$1,278.29 annually.

Time Use Study Data Collection

Quarterly data collection will be conducted four times per year, from approximately 36 respondents in supervisory or administrative positions in partner organization participating in the PFS Demonstration. Estimate of the burden is based on 1 hour to respond to the emailed request or to complete an interview, and the estimated annual burden for the time use study is 144 hours.

We estimate their cost per response assuming a wage of \$28.91, the BLSOES median hourly wage of for First-Line Supervisors of Office and Administrative Support Workers (SOC cod 43-1011). For 36 respondents taking one hour 4 times per year multiplied by the hourly wage of \$28.91 equals \$4,163.04 annually.

Exhibit A-2: Estimated Hour and Cost Burden of Information Collection.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Annual Partnership Survey	120	1	120	0.33	39.60	32.28	\$1,278.29
Time Use Study Data Collection	36	4	144	1	144	28.91	\$4,163.04
Total	156				183.60		\$5,441.33

(Source for wage data: Bureau of Labor Statistics, Occupational Employment Statistics, May 2019. https://www.bls.gov/oes/current/oes_stru.htm)

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

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for**

collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;

- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There are no additional total annual cost burdens to respondents or record-keepers beyond the labor cost of burden-hours described in item 12 above.

14. Provide estimates of annualized costs 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 these data collection efforts the Evaluation of the Pay for Success Permanent Supportive Housing Demonstration totals \$64,852 over the 12-month period following the expiration of the current OMB approval. The cost of the data collection to the Federal government is based on contractor's labor hours to perform data collection and analysis activities including outreach to participants, conduct surveys and interviews, and data analysis. The data collection costs are based on the contractor's labor hours in its contract proposal for this study.

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

This is a revision of a currently approved collection OMB 2528-0319.

16. For collections 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.

The data collected will be analyzed, tabulated, and reported to HUD by the evaluation contractor, The Urban Institute.

Partnership Survey

Partnership survey items will be combined into indices after examination of the alpha coefficient of reliability before tabulation.

Under prior OMB approval, the Urban Institute conducted the Partnership Survey annually, from January 2018 through March 2021. Results were included in the Year 2 Evaluation Report, which is publicly available, and in the Year 3 Evaluation Report, which is currently undergoing HUD clearance and will be made publicly available.

Results for the proposed survey will be presented in the final Evaluation Report.

Time Use Study Data Collection

The quarterly time use data collection will be conducted from the time of this renewal through January 2022. If the study is extended data collection will continue through its conclusion. Its results will be combined with information from actual grant spending from DRGR to describe overall time spent on the project.

Under prior OMB approval, the Urban Institute included time use findings in two annual reports and in briefings to HUD and DOJ project leadership. Time use results were included in the Year 3 Evaluation Report, which is currently undergoing HUD clearance and will be made publicly available.

Results from the currently proposed data collection will be presented in the final Evaluation Report and in a final briefing to HUD and DOJ project leadership.

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

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

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

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