Family Options 12 Year Study: Tracking and Reengagement Data Collection

Supporting Statement for Paperwork Reduction Act Submission Part A

January 7, 2022

Family Options 12 Year Study: Tracking and Re-engagement Data Collection

Background

The U.S. Department of Housing and Urban Development (HUD) has invested considerable resources into strategies to address family homelessness. Senate Report 109-109 for the FY 2006 Transportation, Treasury, Judiciary, HUD, and Related Agencies Appropriations bill directed the Department to focus its energies on families who experience homelessness and to "undertake research to ascertain the impact of various service and housing interventions in ending homelessness for families." In 2008, HUD launched the *Family Options Study*, a multi-site experiment designed to test the impacts of different housing and service interventions on families who experience homelessness, in five key domains: housing stability, family preservation, adult well-being, child well-being, and self-sufficiency. The study, conducted by Abt Associates and its partner Vanderbilt University, compared the effect of three active interventions—long-term housing subsidy, community-based rapid re-housing, and project-based transitional housing—to one another and to the usual care available in the study communities.

From September 2010 through January 2012, 2,282 families (with 5,397 children) across 12 communities enrolled in the Family Options Study after spending at least 7 days in emergency shelter. At the time of enrollment families provided their consent to participate in the study and completed a baseline survey (OMB #2528-0259, Expiration Date: 05/31/2013). The study randomized these 2,282 families to one of four interventions distinguished by the type and duration of housing assistance and supportive services. The research team tracked the families for over three years and administered two separate follow-up surveys to families during that time period under the same OMB control number; a 20-month followup survey (OMB #2528-0259, Expiration Date: 3/31/2015) and a 37-month followup survey (OMB #2528-0259, Expiration Date: 3/31/2017).

Both the design and the scale of the study provided a strong basis for conclusions about the relative impacts of the interventions over time, and the outcomes measured during the followup data collection yielded powerful evidence regarding the positive impact of providing a non-time-limited housing subsidy to a family experiencing homelessness. It is possible, though, that some effects of the various interventions might change over time or take longer to emerge, particularly for child well-being. In 2017, several years after the 37-month data collection had been completed, HUD launched a tracking effort to re-establish contact with the study sample, update the contact information for all participants, collect additional information on key outcomes of interest, and, ultimately, assess the feasibility of future research efforts (OMB #2528-0259, Expiration Date: 8/31/2020). The success of that tracking effort motivated HUD to pursue a new wave of primary data collection with the study families approximately 12 years after random assignment.

The Information Collection Request (ICR) for the 12-year data collection for the Family Options Study will be submitted to OMB in two phases. This first ICR seeks approval for the materials associated with the first phase of data collection—the Tracking and Reengagement Data Collection phase. In this phase, HUD is seeking approval from OMB to reuse the tracking materials and the Family Options Study Information Release Form that were administered during the tracking effort HUD launched in 2017. A second, subsequent ICR will be submitted to OMB in the future and will include the 12-year survey instruments and the informed consent materials to be administered to the study families (see Exhibit A.).

Exhibit A-1: Information Collection Timeline and Contents

Tracking and Re-engagement Phase

Information collection anticipated April 2022 – September 2022

- Welcome Back Newsletter and Participant Contact Update Form
- 12 Year Tracking Survey
- Information Release Survey

12-Year Study Data Collection Phase

Information collection anticipated October 2022 – September 2023

- Adult Head of Household 12 Year Survey
- Child Survey (Ages 10-17)
- Web-based Survey of now Adult Children (Ages 18+)
- 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.

HUD plans to conduct 12-year study data collection with the families who enrolled in the Family Options Study between 2010 and 2012. Through this effort, the original sample of families will be located, administered informed consent, and administered a short survey. This Information Collection Request, the tracking and reengagement data collection, serves as the first of two requests to be submitted to OMB related to this long-term data collection effort. A copy of the relevant section of law authorizing the Department to undertake "such programs of research, studies, testing, and demonstration relating to the mission and programs of the Department" (12 USC 1701z-1 et seq.) is included as Appendix E.

The tracking and reengagement effort will have three components:

While the initial study sample included 2,282 families, 41 families have a head of household that is confirmed deceased. Thus, the current sample for the 12-year study is 2,241 families.

Welcome Back Newsletter and Participant Contact Update Form

To reengage the study participants, the study team will mail a "Welcome Back" Newsletter (Appendix A) to thank households for their continued cooperation with the Family Options Study, highlight key study accomplishments since the point of last contact, explain the upcoming data collection activities, and offer them an opportunity to update their contact information Newsletters will be mailed to the most current address available for each study family in the current sample database six months prior to fielding the 12-Year study survey.

Along with the Welcome Back/Reengagement Newsletter, we will include a Participant Update Contact Form. We have used this contact update form in prior rounds of data collections. It will allow participants to update their contact information as well as the information for up to two secondary contacts, defined as people who will always know how to reach the participant. We will also request contact information for up to four adult children, to facilitate recruitment, informed consent and survey administration with adult children of study families. The adult child survey instrument will be submitted in the second information collection.

12 Year Tracking Survey

Local interviewers, a critical component to our research effort, will attempt a brief, 15minute tracking survey (see Appendix B) with the adult head of household four months prior to conducting the 12-Year survey. Interviewers will explain that HUD is planning to conduct a 12-year survey and we will be calling them in the near future to administer that survey. Interviewers will address any questions that the families have and then administer the tracking survey to update the respondent's contact information (address, phone number(s), email address), collect contact information for secondary contacts for the head of household, and collect contact information for adult children of the family. We will use the most recent phone number available for each study family.

The 12 year tracking survey also collects data on a small number of key outcome measures to supplement the information collected through the prior follow-up data collection. The tracking survey seeks to capture data on three key outcomes, based on the same items collected in previous surveys:

1. Housing Stability

- a. Current housing status
- b. Homelessness and doubling up in the past 6 months
- c. Participation in homeless and housing assistance programs in the past six months

2. Self Sufficiency

a. Current employment status

b. Length of time since last employed

3. Family Preservation

- a. Current family composition
- b. Status of family members present at previous survey
- c. Contact information for now adult children (new)

The tracking survey will be translated into Spanish.

Information Release Form

Study participants completed a participation agreement at the time of random assignment, providing their informed consent to participate in all aspects of the research studyfollow-up surveys and administrative data collection. As part of the 37- and 78-month follow-up data collection period, the research team also obtained consent to release personally identifiable data collected through the study to HUD. Not all study participants were interviewed during those prior data collection efforts, so there are still families who have not yet provided consent to release their PII to HUD.

Under this information collection request, HUD seeks approval to collect information release forms for study participants who have not yet signed one. Seeking an information release form for those families now positions HUD for continued collection of administrative data to measure the long-term outcomes of study participants. (The Information Release Form is found in Appendix D.)

This information collection request is being submitted as a reinstatement with minor changes of a previously approved collection (OMB #2528-0259) and contains the participant Welcome Back Newsletter and Contact Update Form and the 12 Year Tracking Survey, and the Information Release Form as the instruments for review and approval under this request (included as Appendix A, B, and C). A version of these forms were approved by OMB prior to the tracking effort HUD conducted in 2017 (OMB #2528-0259, Expiration Date: 8/31/2020, ICR Reference Number 201609-2528-001).

HUD contracted with Abt Associates in September 2021 for the administration of the tracking and reengagement data collection. This research is conducted under the authority of the HUD Secretary to undertake programs of research, studies, testing and demonstration related to the mission and programs of HUD (12 USC 1701z-1 et seq.).

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 information collected for this study will be used by the research team to reengage with the families who are part of the Family Options Study and to ensure that updated contact information for each household is obtained. This information collection will support a successful implementation of the planned 12-year study survey of study families. The research team collected contact information for each sample member at baseline and at the time of each subsequent round of data collection, most recently during the administration of the 78-month tracking survey. This new round of data collection will begin by mailing a welcome back/reengagement Newsletter and the Participant Contact Update Form, followed by the administration of the telephone Tracking Survey. The objective for both activities is gathering updated contact information. The newsletter will be followed by the Tracking Survey. The team will use this contact information to locate each sample member to facilitate the 12-Year survey data collection.

The primary beneficiary of the planned tracking and reengagement efforts will be HUD. HUD will use the information from the tracking activities to prepare for the 12-year survey with study families. Other federal and non-federal researchers working with the Family Options Study data will also benefit, as the additional data collected under the long-term data collection effort will be appended to the existing Family Options Study dataset currently stored at the U.S. Census Bureau.

HUD, policy makers at all levels of government, and local homeless service providers have benefitted greatly from the data collected for this study under earlier data collection efforts included under OMB Approval Number: 2528-0259. The study data collected to date were used in the following reports, all of which can be found on the study webpage located at https://www.huduser.gov/portal/family options study.html:

- Interim Report published in March 2012 (Daniel Gubits et al., *Interim Report*, *Family* Options Study (Washington, DC: U.S. Department of Housing and Urban Development, March 2013).
- The Family Options Study: Short-Term Impacts of Housing and Services Interventions for Homeless Families (Gubits et al., 2015), presents findings from the 20-month impact analysis;
- The Family Options Study: Three-Year Impacts of Housing and Services Interventions for Homeless Families (Gubits et al., 2016) presents findings from the 37-month impact analysis;
- Family Options Study: Long-Term Tracking Project (McInnis et al., 2020), presents the results of a 6-month effort to assess the quality of the study sample contact information and limited descriptive data on the sample;
- A series of research briefs on special topics sponsored by the Department of Health and **Human Services:**

- A public use dataset (available on www.huduser.gov) and a restricted access dataset (available through the U.S. Census Bureau); and
- A series of academic papers published in peer-reviewed journals.
- 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.

Improved information technology will be used in support of this information collection in the following ways:

- to store all information on sample locating and re-engagement efforts in an electronic record of contact: and
- to append all data collected to the evaluation database.

Outreach and engagement to study families will be conducted using the currently available contact information for study families, including mailings to physical addresses, telephone calls, and e-mails sent to those sample households who provided an e-mail address to the research team previously. Offering multiple options for families to respond to study outreach (paper, phone, online) gives families flexibility to respond in a manner most comfortable for them, which may lead to better response and more up to date contact information. All updated contact information for study participants will be entered into a master evaluation database. This master evaluation database contains historical contact information for all study participants. Interviewers will use this history of participant contact information to locate study participants and update existing information and add new contacts as needed.

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 Family Options Study is the largest experimental study of interventions serving homeless families that has been conducted to date. The study sample provides a unique opportunity to examine the effects of the interventions and to explore family dynamics and well-being over time. Accurate locating information will be crucial to achieving a high survey response rate to the 12-year survey. By the time the long-term data collection begins (anticipated in October 2022), approximately 4.5 years will have passed since the last contract with study participants.

Information about the study participants' current contact information is not available through any other source, though the research team will seek to reduce the burden on respondents by also reviewing HUD data systems to gather location information for any study families that are currently receiving HUD housing assistance, as well as consulting other proprietary databases that may provide contact information for the study sample.

The research team will avoid duplication by using a centrally maintained database to electronically store the contact information for the sample. The research team will use this database to verify and correct previously provided contact information throughout the reengagement and tracking phase of the study.

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.

Respondents for this data collection include families who voluntarily enrolled in the study, not business entities. There is no expected burden on 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.

Under the previously approved information collections, the research team maintained frequent contact with study participants—attempting to contact families on a quarterly basis. The last contact with the study families occurred during the 78-month tracking survey data collection between October 2017 and March 2018. Thus, a key challenge for the 12-year data collection will be locating study participants and renewing contact with them after an extended period of time with no contact.

Accurate locating information is crucial to achieving a high response rate to the 12-year survey, and therefore, it is imperative to attempt to locate families as soon as possible to minimize the length of time elapsed since the last contact with them. Immediately upon receiving approval from OMB, the research team will launch the tracking and reengagement activities. Failure to complete the reengagement and tracking activities that will enable the research team to acquire updated contact information for the study sample will greatly increase the risk of a low response rate to the subsequent 12-year survey.

- 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 5 CFR 1320.8 (Paperwork Reduction Act of 1995), HUD published a 60-Day Notice of Proposed Information Collection in the Federal Register on January 11, 2021 (Docket No. FR-7041-N-01, pages 1993-1994). The notice provided a 60-day period for public comments, and comments were due March 12, 2021. No comments were received. (See Appendix D for a copy of the Federal Register Notice.)

The *Family Options Study* research design was developed and has been implemented with the assistance of Abt Associates Inc., the prime contractor. Several subcontractors and consultants have collaborated with the Abt team to develop the study design, including Dr. Marybeth Shinn of Vanderbilt University. Key members of the Abt team for the 12 Year study are:

- Ms. Michelle Wood and Dr. Daniel Gubits (Co-Principal Investigators)
- Ms. Lauren Dunton (Project Director)
- Dr. Scott Brown (Director of Analysis)
- Dr. Jill Khadduri and Dr. Laura Peck (Co-Project Quality Advisors)
- Ms. Debi McInnis and Ms. Brenda Rodriguez (Directors of Survey Data Collection)
- Mr. Doug Walton and Dr. Samuel Dastrup (Administrative Data Task Leads)
- Mr. Tom McCall (Data Files Task Lead)

HUD has collaborated on the design of the evaluation with the research team throughout all phases of the study to date. The purpose of such consultation is to ensure the technical soundness and usefulness of the data collection instruments in carrying out the aims of the evaluation.

The period of data collection for the reengagement and tracking efforts is six months.

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

Incentive payments have been a powerful tool for maintaining low attrition rates in longitudinal studies, and in the Family Options Study in particular. By the time that the participant engagement and tracking begins (anticipated Spring 2022) it will have been approximately 4.5 years since the participants were last contacted by the research team. Given the substantial time since last contact and the burden of continued participation in the study, we propose offering incentives to participating households to help minimize non-response bias and to offset the costs of participation. Given the importance of launching the followup survey effort with high-quality and comprehensive contact information for study participants, we are proposing the following incentive structure for the tracking and reengagement effort:

- Study households will receive a \$15 incentive payment if they return a completed *Family Options Study Participant Contact Update Form*;
- Study households will receive \$20 for participating in the *Tracking Survey* and confirming or updating their contact information; and

Over the past decade, the use of incentive payments for the Family Options Study helped to ensure a high response rate to the prior data collection efforts to facilitate unbiased impact estimates to analyze the effects of the interventions studied.

Three factors helped to determine the incentive amounts for each round of data collection:

- 1. Respondent burden, both at the time of the interview and over the life of the study;
- 2. Costs associated with participating in the interview at that time; and
- 3. Other studies of comparable populations and burden.

The *Family Options Study* panel is small (2,241 families) and avoiding attrition is essential to the success of the study. Accurate and comprehensive contact information for the full study sample will be critical to achieving a high response rate during the 12-year study data collection, therefore we believe it is crucial to take every possible step to minimize panel attrition over the study follow-up period. Ensuring minimal attrition is the core justification for an incentive system for the tracking and reengagement activities. The challenges associated with maintaining the study are further complicated by the housing instability likely in this study population.

Our experience with this study population shows that it does respond positively to incentive payments. Previous research has shown that sample members with certain socio-economic

characteristics are significantly more likely to become survey respondents when incentive payments are offered. In particular, sample members with low incomes and/or low educational attainment have proven responsive to incentives, as have minority group members. These characteristics are expected to be heavily represented in this study panel (Duffer et al. 1994); Educational Testing Service (1991).

Based on our prior experience with this study sample, the previously approved incentive structure for and the additional considerations and prior research experience cited here, we believe that that the use of incentives will improve substantially the probability of participant reengagement.

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

HUD entered into a contract with an independent research team, Abt Associates to conduct this research effort. Because of the nature of the information collected from and about study participants, strict confidentiality procedures will be followed for this evaluation. Prior to beginning the data collections included in this submission, the study protocols and materials will be reviewed in detail by Abt Associates' Institutional Review Board (IRB) and Abt Associates Cybersecurity team.

The information requested under this collection is protected and held confidential in accordance with 5 U.S.C. § 552a (Privacy Act of 1974) and OMB Circular No. A-130. A Privacy Impact Assessment completed for the Family Options Study data files is on file with HUD, and a System of Records Notice (SORN) was published in the Federal Register in October 2010 (FR-5386-N-10), and subsequently amended at the time of the 37-month data collection and published in the Federal Register in February 2014 (FR-5763-N-02). HUD is currently reviewing the existing SORN to assess the need updates that may be required in support of the 12-year data collection.

All research staff working on the project have been trained to protect private information and the study has a Data Security Plan governing the storage and use of the data collected through the study. Individuals will not be cited as sources of information in prepared reports. All respondents included in the study will be informed that their participation in the data collection is voluntary and the information they provide will be used only for statistical purposes only.

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.

The Family Options Study participant contact update form does not contain any sensitive questions. The Family Options Study tracking survey does contain some questions that participants may consider sensitive, such as questions about experiences with homelessness or changes in family composition. Study participants will be reminded that their participation in the study is fully voluntary, and that they can choose not to answer any questions or stop the interview at any time.

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 tracking and reengagement effort is anticipated to last roughly six months. The tracking and reengagement effort includes the administration of the participant contact update form, the tracking survey, and the information release form. The target respondent group for this information collection are the 2,241 families that comprise the sample for the Family Options Study, therefore, this information collection will affect 2,241 individuals—one individual representing each family. Completion of the Participant Contact Update Form and Information Release Form is expected to take on average, five minutes, or 0.08 hours per respondent. The 12 Year Tracking Survey is expected to take 15 minutes, or 0.25 hours per respondent. Estimates

are based on prior experience administering these forms. The Participant Contact Update Form, the 12 Year Tracking Survey and the Information Release Form will be completed a single time by each family (see Exhibit A-2). The sample size for the Information Release Form is 1,272 individuals, not 2,241 individuals, which is the sample size for the other instruments. The sample size for Information Release Form is smaller because we only need to collect the information release from those who did not complete this form at one of the prior interviews.

The estimated total annual burden of this information collection is 841 hours. The estimated total annual cost for this information collection is \$8,536.15. The estimated total annual cost is calculated by multiplying the total number of respondent hours (179) by \$10.15. The amount of \$10.15 was calculated using the minimum hourly wage (\$7.25) plus an assumed 40 percent for fringe benefits (see Exhibit A-1).

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

Annualized Burden Table								
Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Cost	
Welcome Back Newsletter and Participant Contact Update Form	2,241	1	1	.08	179	\$10.15	\$1,819.69	
12 Year Tracking Survey	2,241	1	1	.25	560	\$10.15	\$5,686.54	
Information Release Form	1,272	1	1	.08	102	\$10.15	\$1,032.86	
Total	5,754				841		\$8,539.09	

- 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 complete the Participant Contact Update Form as described in item 12 above. There is no known 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 tracking and reengagement data collection effort will be carried out under a HUD Contract with Abt Associates. HUD estimates the total cost to the Federal government for this tracking and reengagement data collection effort to be approximately \$724,200 (see Exhibit A-3). This total cost can be broken down into two components: 1) professional labor, to carry out the tracking and reengagement effort (\$685,000), and 2) incentive fees associated with each of the three opportunities for participants to update their contact information (\$39,200).

The professional labor includes the labor hours required to implement the two components of the tracking and reengagement effort: 1) mailing the Welcome Back Newsletter/ the Participant Contact Update Form; and 2) administering the 12 Year Tracking Survey to study households. The labor hours also include time to process the responses to these two efforts to reengage and update the contact information provided by participants. HUD anticipates that the total labor cost for this activity will be \$685,000. This includes the cost related to salaries of Abt employees, hours for subcontracted interviewers, and operational expenses such as developing the web-based data collection system, translation costs, and mailing and shipping costs.

The total incentive fees anticipated to be paid are based on the expected response rate and the value of the monetary incentive to be offered for each outreach effort. We expect roughly 50 percent of all households will respond to the initial Welcome Back Newsletter and Contact Update Form and receive the \$15 incentive fee for an anticipated cost of \$16,800. We expect roughly 50 percent of all households will participate in the Tracking Survey and receive the \$20 incentive fee for an anticipated cost of \$22,400.

Exhibit A-3: Estimated Annual Cost to the Federal Government

Activity	Estimated Cost to Federal Government	Total Labor Hours for Information Collection	
Professional Labor	\$685,000	8,431	
Incentive Fees	\$39,200	N/A	
Total	\$724,200	8,431 hours	

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

This information collection request is being submitted as a reinstatement with minor changes of a previously approved collection (OMB #2528-0259) and contains the participant Welcome Back Newsletter and Contact Update Form and the 12 Year Tracking Survey, and the Information Release Form as the instruments for review and approval under this request (included as Appendix A, B, and C). A version of these forms were approved by OMB prior to the tracking effort HUD conducted in 2017 (OMB #2528-0259, Expiration Date: 8/31/2020, ICR Reference Number 201609-2528-001). There are three updates of note since the approval provided by OMB in 2017. First, the sample size has decreased modestly. While the initial study sample included 2,282 families, the tracking survey administered in 2017 identified 41 families with a head of household that was confirmed deceased. Thus, the current sample for the 12-year study is 2,241 families. Second, the Welcome Back Newsletter and Contact Update Form has been modified to add a place for households to provide contact information for any children who have aged into adulthood since the study began in 2008. Finally, the 12 Year Tracking Survey has been modified slightly to remove references to programs funded under the Homelessness

Prevention and Rapid Re-housing Program (HPRP) which was active in 2017, but has since expired.

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.

The information collected under this ICR will not be published. The sole purpose of this information collection is to conduct outreach to the families enrolled in the Family Options Study, and to confirm/update their current contact information. A second, subsequent ICR will be submitted to OMB in the future and will include the 12-year study survey instruments and the informed consent materials to be administered to the study families. The results of this second phase data collection will result in a publicly available published report.

The proposed timeline for the tracking and reengagement effort is as follows:

- Mailing the Welcome Back Newsletter and the Participant Update Contact Form to study households (April 2022)
- Executing the 12 Year Tracking Survey (June 2022)
- Pending OMB Approval of Phase 2 ICR: 12-Year Study Survey administration (October 2022 – October 2023)

If the timeline for the 12-year study adheres to the schedule above, a final report would be expected in Fall 2024.

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

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

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

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

References

- Duffer, Allen P. et al., Effects of Incentive Payments on Response Rates and Field Costs in a Pretest of a National CAPI Survey, (Research Triangle Institute, May 1994).
- Gubits, Daniel et al., *Interim Report*, *Family Options Study*, Washington, DC: U.S. Department of Housing and Urban Development, March 2013. http://www.huduser.org/portal/publications/homeless/hud 503 FOS interim report.html
- Gubits, Daniel, Marybeth Shinn, Stephen Bell, Michelle Wood, Samuel Dastrup, Claudia D. Solari, Scott R. Brown, Steven Brown, Lauren Dunton, Winston Lin, Debi McInnis, Jason Rodriguez, Galen Savidge, and Brooke E. Spellman. 2015. Family Options Study: Short-Term Impacts of Housing and Services Interventions for Homeless Families. Washington, DC: Government Printing Office U.S. Department of Housing and Urban Development.
- Gubits, Daniel, Marybeth Shinn, Michelle Wood, Stephen Bell, Samuel Dastrup, Claudia D. Solari, Scott R. Brown, Debi McInnis, Tom McCall, and Utsav Kattel. 2016. Family *Options Study: Three-Year Impacts of Housing and Services Interventions for Homeless* Families. Washington, DC: Government Printing Office U.S. Department of Housing and Urban Development.
- McInnis, Debi, Daniel Gubits, Brenda Rodriguez, Scott Brown, and Michelle Wood. 2020. Family Options Study: Long-Term Tracking Project. Washington, DC: Government Printing Office U.S. Department of Housing and Urban Development. Washington, DC: Government Printing Office U.S. Department of Housing and Urban Development.
- National Adult Literacy Survey Addendum to Clearance Package, Volume II: Analyses of the *NALS Field Test* (Educational Testing Service, September 1991), pp. 2-3.