**Supporting Statement for Paperwork Reduction Act Submission**

EnVision Centers Implementation Evaluation

OMB Control # 2528-XXXX

**A. Justification**

1. **Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The Fiscal Year 2019 budget for the U.S. Department of Housing and Urban Development (HUD) included funding to implement an evaluation of the EnVision Centers initiative. These funds will be used to conduct a qualitative implementation evaluation of EnVision Centers to establish foundational knowledge of a new and rapidly growing initiative. Through an Inter-Agency Agreement (IAA), the Library of Congress’ Federal Research Division will administer the evaluation on behalf of HUD. This research is conducted under the authority of the Secretary of the U.S. Department of Housing and Urban Development to undertake programs of research, studies, testing, and demonstration related to HUD’s mission and programs (12 USC 1701z-1 et seq.).

***Purpose and Overview of the Study***

EnVision Centers are a new and rapidly growing initiative that create a critical need to gain in-depth knowledge of local implementation efforts across multiple sites. This knowledge will help guide the development of the initiative while establishing a framework for future program monitoring and evaluation efforts. To meet this need, the study will conduct a qualitative implementation evaluation of a diverse selection of at least 18 EnVision Centers from the first four cohorts of designations. All data collected as part of this PRA submission will be administered through qualitative, semi-structured interviews with local stakeholders and program participants from each of the selected sites. Data collected from interviews will later be synthesized into site specific case studies of each selected EnVision Center. A preliminary and final comprehensive report[[1]](#footnote-1) will include a rigorous literature review to seek best practices from similar collocated services programs, a document review to complement data collected from interviews and site visits, and integrated analysis from the site-specific case studies (summarizing best practices, early planning, partnerships, data collection, service coordination, experiences of program participants offered services, and other key characteristics of the initiative to date).

***Program Background***

EnVision Centers are a collocated services model intended to help persons achieve self-sufficiency through accessible and integrated services that are centralized within brick-and-mortar hubs. Target populations for EnVision Centers are intended to be prioritized in the following order: 1) persons who receive public housing assistance; 2) persons who live in low-income communities; and 3) “all Americans who want expanded opportunities.” The model is structured by four key pillars that serve as a basis for core service areas intended to help participants achieve self-sufficiency: economic empowerment, educational advancement, health and wellness, and character and leadership.

In place of direct funding, HUD’s support includes guidance for implementing an EnVision Center and helping communities connect and leverage partnerships across a range of entities, such as: local industries, non-profits, local and federal government agencies, philanthropic, and faith-based organizations. These partnerships are intended to provide communities with resources for implementing and operating an EnVision Center. The absence of direct federal funding and the initiative’s place-based model gives communities broad discretion in implementing and operating an EnVision Center based on local priorities, needs, and resources of the community.

In June 2018, HUD designated the first 18 EnVision Centers and has since rapidly expanded the initiative with a total of over 90 designated EnVision Centers to date.

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

This is a new collection. All data as part of this OMB request will be collected using qualitative, semi-structured interviews from local stakeholders and participants of EnVision Centers from the first four designated cohorts. The Federal Research Division (FRD) at the Library of Congress will collect all data for this study on behalf of HUD. HUD will use the information collected to learn about the implementation efforts of EnVision Centers, including: early planning, new partnerships and leveraged resources, participant level data collection, and service coordination. This study will help HUD develop the initiative and establish a foundation for future evaluation efforts.

***Description of Data Collection Activities***

Data collection for this evaluation will be structured within three core components as follows:

Site Visits

Researchers intend to visit each selected site to observe the layout of the EnVision Center, the neighborhood or area that surrounds the center, and how services are provided. Researchers will make detailed notes of their observations, to be used in tandem with data gathered from interviews (as described in the subsequent component below). Site visits will include brief tours of the center, informal discussions with local stakeholders, and sitting in on related community and program meetings as possible (with permission from local stakeholders). All site visits will be voluntary, based on the discretion of local site leadership. **Due to the ongoing COVID-19 pandemic, site visits may be canceled due to health risks and related concerns.**

Interviews

All data collection as part of this submission request will be from qualitative, semi-structured interviews with local stakeholders and participants.The evaluation team will select four groups of interviewees for the interviews: local leadership, frontline staff, program participants, and partners. Leadership will include community executives (from entities such as Public Housing Authorities, local government, and non-profits) who were involved with early planning efforts that led community efforts to seek EnVision Center designation, and persons involved with managing the daily operations of the center. Front line staff will include onsite service coordinators, intake workers, case managers, and staff involved directly with connecting participants to services at the EnVision Center. Program participants will include persons who were offered or have received services or assistance at the EnVision Center. Partners will be representatives from organizations (such as service providers, faith-based entities, or philanthropic organizations) that provide services and resources for the EnVision Center. Due to the pandemic and related Center for Disease Control (CDC) social distancing measures, all interviews will initially take place virtually or by phone. If researchers are able to perform site visits, in-person interviews may occur to with local stakeholders who were not available for the phone/virtual interviews. Questions asked during the follow-up interviews will be referenced from the same interview guide used for the initial remote interviews. All interviews will be voluntary.

Literature & Document Review

A rigorous literature and document review will complement the data gathered from the site visits and interviews. The literature review will seek available literature from existing collocated services programs that may offer best practices and insights. The document review will collect data from available program documents and reports, to include Action Plans and Quarterly Progress Reports. The Action Plans and Quarterly Progress Reports have already received OMB approval, and are therefore not part of this submission request.

***Research Questions***

Interviews and site visits will be based on the research questions in Exhibit A-1 below. An interview guide for each interview group is attached to this submission as a separate document.

**EXIBIT A-1. RESEARCH QUESTIONS TO BE ADDRESSED IN INTERVIEWS**

| Research Questions | Sub-Questions |
| --- | --- |
| *How and why did communities apply to become an EnVision Center?* | * What was the process to be considered as an EnVision Center designee? * What guidance was available before and during the designation process? * What were the motivations and expectations of the community before applying? |
| *How was the EnVision Center location established? What are the physical characteristics of an EnVision Center?* | * Where in the community is the EnVision Center located? How did the community determine the location of the EnVision Center? * What resources were used to construct or renovate the location of the EnVision Center? * What is the layout of an EnVision Center? * Is the EnVision Center located within shared or dedicated space? |
| *What is the organizational structure of an EnVision Center?* | * Who leads the daily operations of the EnVision Center? What is the management structure? * What are the roles of key, frontline staff at the EnVision Center? * Who are the main entities that lead the EnVision Center and how does this influence services and the populations served? |
| *What are the services and partnerships of the EnVision Center?* | * How have services changed since the designation of the EnVision Center? * What new services are available since designation of the EnVision Center? * How are services integrated for participants? * How have partnerships changed since designation of the EnVision Center? |
| *How is data collected and reported at the EnVision Center?* | * How does the EnVision Center perform intake and collect data from participants? * How does the EnVision Center track data and measure performance? * How does the EnVision Center store and report data? |
| *Who are the program participants, and how have they benefited from the designation of an EnVision Center?* | * What populations does the EnVision Center serve? * What are the unique needs of program participants within each community? * How do program participants access the EnVision Center? * What is the perspective and experience of program participants who have sought services at an EnVision Center? |
| *How has the COVID-19 pandemic changed implementation efforts?* | * How did local restrictions affect services offered by the EnVision Center? * How did EnVision Centers assist with pandemic relief efforts? * Did the EnVision Center continue to meet its original goals? How did goals change? |

1. **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.**

Interviews will initially be conducted remotely via a secure videoconference platform (such as WebEx) or over the phone. Remote interviews will reduce safety and social distancing burdens due to the pandemic. Interviewers will record responses using a voice recording device and by typing responses in Microsoft Word using a laptop. The interviewers will first request permission from interviewees to record the interview before proceeding with interview questions.

Interview responses will be directly uploaded to NVivo, a qualitative data analysis software for coding and analysis.

1. **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.**

Due to the recent designations and implementation of EnVision Centers, there are no known studies with which this study would duplicate. An early reconnaissance effort was conducted by HUD to establish research questions and a framework for this study. This effort involved interviews with stakeholders from a small number of EnVision Centers which will not be included in this study.

Conducting interviews using a semi-structured interviewing format will allow interviewers to adjust in real-time based on received answers, ensuring respondents are not asked redundant questions that do not pertain to their work.

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

1. **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.**

EnVision Centers vary in size, some with limited staff and resources. To minimize the burden on these centers, initial interviews will be conducted remotely which will minimize both staff burdens and burdens related to the pandemic. If site visits are conducted (contingent on the status of the pandemic), in-person interviews will take place at a location most convenient for the interviewee, virtually, or by phone. When possible, group interviews will be conducted to minimize the number of interviews and related burden of interviewees. Interviewees will be given information pertaining to the kinds of questions in advance to allow for preparation and to understand what information will be asked.

1. **Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The interviews are a one-time data collection event, with no repetition of data collection planned. Without this data collection effort, HUD will be unable to fully understand how EnVision Centers are implemented across the first four cohorts of designations as limited data is currently available. This data collection is therefore critical for program development and for building a foundation for future evaluation efforts (such as establishing metrics, monitoring program performance, or evaluating the impact of the initiative once sufficient data is available). Further, without this data collection, HUD would not be able to adequately answer the study’s key research questions or respond to the congressional request to evaluate this initiative.

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

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), a Notice of Proposed Information Collection for publication in the Federal Register has been prepared to announce the agency’s intention to request an OMB review of data collection activities for the Implementation Evaluation of EnVision Centers. HUD published a 60-Day Notice of Proposed Information Collection in the Federal Register on November 17, 2020 (Docket No. FR-7029-N-10, page 73292). The notice provided a 60-day period for public comments, and comments are due January 19, 2021.

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

No payment or gift will be offered to respondents as part of this study.

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

HUD has entered into an interagency agreement with an independent research team, Library of Congress’ Federal Research Division, to conduct this research effort. HUD and the research team will make every effort to maintain the privacy of respondents, to the extent permitted by law. The information requested under this collection is protected and held confidential in accordance with 42 U.S.C. 1306, 20 CFR 401 and 402, 5 U.S.C.552 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act of 1974) and OMB Circular No. A-130.

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. Personally Identifiable Information (PII) such as respondent addresses or social security numbers will not be collected for this study. 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 research purposes.

1. **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 data collection instruments do not contain sensitive information.

**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 demonstrates the projected burden hour estimates for interviews with EnVision Center leadership, staff, partners, and program participants. The total annual cost burden to respondents is approximately $5,372.10

All interviews (for all four interview groups) are anticipated to last about one hour. Interviews with leadership will include approximately 5 interviewees from each site (a total of 90 interviewees across all sites), at an hourly rate of $35.05 and an estimated total cost of $3,154.50 across all sites. Interviews with front line staff will include approximately 3 interviewees from each site (a total of 54 interviewees across all sites), at an hourly rate of $17.39 and an estimated total cost of $939.06 across all sites. Interviews with program participants will include approximately 5 interviewees from each site (a total of 90 interviewees across all sites), at an hourly rate of $7.25 and an estimated total cost of $652.50 across all sites. Interviews with local partners will include approximately 2 interviewees from each site (a total of 36 interviewees across all sites), at an hourly rate of $17.39 and an estimated total cost of $626.04 across all sites.

**exibit a-2: estimated Hour and Cost Burden of Information Collection (entire length of study)**

| ***Information Collection*** | ***Number of Respondents*** | ***Frequency of Response*** | ***Responses per Annum*** | ***Burden Hour Per Response*** | ***Annual Burden Hours*** | ***Hourly Cost per Response[[2]](#footnote-2)*** | ***Cost*** |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Qualitative Interviews –Leadership | 90 | 1 | 90 | 1 | 90 | $35.05 | $3,154.50 |
| Qualitative Interviews – Front Line Staff | 54 | 1 | 54 | 1 | 54 | $17.39 | $939.06 |
| Qualitative Interviews –Participants | 90 | 1 | 90 | 1 | 90 | $7.25 | $652.50 |
| Qualitative Interviews –Partners | 36 | 1 | 36 | 1 | 36 | $17.39 | $626.04 |
| **Total** | **270** |  |  |  | **270** |  | **$5,372.10** |

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

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

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

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

The estimated cost to the federal government for this evaluation and participant data collection totals $299,470. The data collection costs are one-time costs.

**EXIBIT A-3: TOTAL COSTS TO FEDERAL GOVERNMENT**

|  |  |
| --- | --- |
| **Task** | **Cost** |
| Preliminary Research | $94,680 |
| Site Visits and Interviews (data collection) | $157,190 |
| Report Creation | $47,600 |
| **Total:** | **$299,470** |

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

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

**16. For collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Exhibit A-4 shows the report schedule for this project. Dates may need to be adjusted due to the COVID-19 public health emergency and related data collection delays.

**exibit a-4: estimated project timeline**

Estimated Project Timeline

|  |  |  |
| --- | --- | --- |
| **Task** | **Description** | **Timeframe (after OMB approval)** |
| Site visits | Interviews with center leadership, frontline staff, partners, and participants as available. | April 2021- September 2022 |
| Follow-up phone/email interviews | Phone and email interviews to resolve any questions from initial interview or provide more information as needed. | January 2022-September 2022 |
| Reports | Drafting of case studies, preliminary report, and final comprehensive report. | March 2021 to -September 2022 |

**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.

1. A comprehensive report is contingent on in-person site visits. If site visits are canceled due to the pandemic, the preliminary report will serve as the final report for this study. [↑](#footnote-ref-1)
2. Hourly costs for leadership, front line staff, and partners based on the Occupational Employment Statistics: <https://www.bls.gov/oes/current/naics4_624200.htm#21-0000> . Hourly cost for participants based on the Federal Minimum Wage: <https://www.dol.gov/general/topic/wages/minimumwage>. [↑](#footnote-ref-2)