

Supporting Statement for Paperwork Reduction Act Submission, Part A
Rental Assistance Demonstration (RAD) Choice Mobility and Long-term Affordability
Evaluation
(OMB Number 2528-New)

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 ICR is a new request. The Rental Assistance Demonstration (RAD) was authorized under the Consolidated and Further Continuing Appropriations Act of 2012 to enable Public Housing Agencies (PHAs) to convert public housing into project-based Section 8 housing. Conversion addresses projects' short-term capital needs and preserves their long-term physical and financial viability, while other program requirements protect resident rights. The program can also offer tenant-based vouchers under the choice mobility option to residents after they have lived in the converted property for a period of time.

Participation in RAD is voluntary for PHAs. Before applying for RAD, the PHA must set initial goals for the conversion and identify potential and available resources for meeting those goals. Planning begins with identifying projects to be converted. PHAs need to communicate with residents regarding the intended conversion before applying under RAD and must hold at least two resident meetings. The PHA prepares and submits the RAD application to HUD's Office of Recapitalization, which reviews it and works with the PHA to obtain initial approval through a Commitment to enter into a Housing Assistance Payment (CHAP) contract. After several weeks or months, during which the PHA secures financing commitments and finalizes its conversion plans, HUD issues a RAD Conversion Commitment (RCC). After receiving HUD's final approval, the RAD transaction can go to closing, where all legal documents are executed, and the conversion goes into effect. Units that convert under RAD are removed from the public housing program.

After closing, converted properties replace their conventional public housing support (funded through Section 9 of the U.S. Housing Act of 1937) with an assisted housing subsidy (funded through Section 8 of the U.S. Housing Act of 1937). The Section 8 contract is project-based, long-term, and subject to the requirement that it be renewed. In addition, at the choice of the PHA, the Section 8 contract can be either PBV, which is administered by HUD's Office of Public and Indian Housing (PIH), or PBRA, which is administered by HUD's Office of Multifamily Housing.

By leveraging their projects' PBV or PBRA subsidies after conversion, PHAs can finance debt and access other external funds, which could include grants and private-sector equity investment as well as Low-Income Housing Tax Credits (LIHTCs) and other tax credits or incentives. PHAs can then use those funds, in conjunction with internal PHA resources and other external sources in the form of grants, "soft loans," and deferred fees, to recapitalize, rehabilitate, or replace projects. Some properties use RAD to reposition themselves onto a new regulatory platform and

to fund replacement reserves for future rehabilitation costs. Other projects use RAD to pay for upfront construction expenses to rehabilitate existing buildings or, in the case of new construction, to demolish dilapidated structures and build new ones in their place. In some circumstances, the PHA can transfer the Section 8 contract to a different property, which is known as a Transfer of Assistance (TOA).

The RAD program includes significant protections and mobility rights for public housing residents. These protections were put in place during the design of the RAD program to ensure that current residents benefit from the RAD conversion. As part of these protections, RAD requires that PHAs adhere to specific guidelines regarding communication with residents and any disruptions in tenants' ability to occupy their unit during the RAD conversion and associated construction or rehabilitation. Tenants retain almost all their rights as public housing residents and retain access to their affordable unit. For instance, they cannot be rescreened; they will continue to pay no more than 30 percent of their adjusted income for rent; they retain their grievance and organizing rights, as well as access to supportive programs given to public housing residents; and in RAD conversions that involve any displacement of residents, those residents have a "right to return," either to the same unit or to an equivalent or larger unit in the replacement building.

Finally, residents have a right under RAD called choice mobility: All properties that convert assistance must provide residents the choice of moving with continuing tenant-based rental assistance using a Housing Choice Voucher (HCV) within an established time after conversion, which is 1 year if the project converts to PBV and 2 years if the project converts to PBRA. Choice mobility does not mean that a voucher will be received immediately upon request; rather, the household is placed at the top of the housing authority's HCV waiting list and will receive a voucher when one becomes available. There are, however, a limited number of good-cause exceptions for PHAs with insufficient vouchers to support this housing option.

This Paperwork Reduction Act (PRA) submission includes the instrumentation required for use under the RAD evaluation. This study follows-up previous work that HUD funded to understand the impacts of RAD. In this study, HUD is focusing on choice mobility, long-term preservation, asset management, and PHA's organizational changes. These topics grow out of the previous evaluation of RAD, which found tenants to be unaware of but interested in choice mobility, while PHAs seemed ambivalent about it. The current study probes the implementation and impact of this program in greater depth. The previous study also found that RAD improved the financial performance of converted properties, but these findings were limited by the small number of projects that were studied and the short time for measuring long-term impacts. The current study returns to this issue with a larger study population and a longer perspective. The previous study discovered a wide gap in the amount of information available for assessing PBV versus PBRA conversions. The current study focuses on how well these two project types are being monitored and overseen compared with industry best practices. Finally, the current study uses a qualitative study to assess how participation in RAD is affecting PHA's organization, functions, structure, staffing, and resources.

Data are collected under Title 12, U.S.C. Sec. 1701Z-1 and 2.

2. 1Indicate 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 through this study will be used by HUD to evaluate: 1) the implementation and impact of the choice mobility option; 2) the impact of RAD on long-term preservation and the financial viability of converted properties; 3) the adequacy of asset management for RAD conversions under Project-Based Vouchers (PBVs) and Project-Based Rental Assistance (PBRA); and 4) effect of RAD on PHA's organization, functions, structure, staffing, and resources. The study has four major components:

- a. **Choice Mobility Option.** The goal of this study is to evaluate the implementation of the RAD choice mobility option and its impact on property outcomes, tenant outcomes, and the voucher program. The choice mobility option gives residents in RAD conversions the right to request a voucher and receive rental assistance to lease a housing unit in the private housing market. The main data sources for this study are HUD administrative data, public use data on neighborhoods and local housing market conditions, and survey responses from RAD PHAs, RAD property owners, and residents. The choice mobility option study will use primarily descriptive statistics, frequency counts and percentage distributions and test survey results on key questions using t-tests or ANOVA to highlight significant differences, both for one-way tabulations and cross tabulations for comparisons of interest.
- b. **Long-Term Preservation and Financial Viability.** The goal of this study is to evaluate the effectiveness of PHAs at preserving RAD conversions over the long run and sustaining their financial viability, which are the principal objectives of RAD. The study defines long-term preservation as the ability of a property to meet its capital needs over a 20-year period; it defines financial viability as the ability of a property to meet its current and near-term obligations. The main data sources for this study are HUD administrative data, public use data on neighborhoods and local housing market conditions, property financial statements, and survey responses from RAD PHAs and RAD property owners. The long-term preservation and financial viability study compares financial measures before and after (difference-in-difference) the conversion for the following pairwise groups: RAD vs. public housing; RAD PBRA vs. non-RAD PBRA (with and without FHA insurance); and RAD PBV vs. non-RAD PBV.
- c. **Asset Management.** The goal of this study is to describe and assess how well HUD, PHAs, and other parties manage affordable housing assets for both RAD PBV and RAD PBRA conversions. The study conceives of asset management as a process to enhance the financial performance of converted properties and preserve their use as long-term affordable housing. The study design uses current state/future state gap analysis, along the lines of a business process improvement methodology. The study uses literature review and interviews with real estate practitioners to define asset management best practices and survey responses from RAD PHAs and RAD property owners to assess current asset management practices. The analysis compares current practices with the best practices drawn from the documentary literature and experts.

- d. **PHA Organizational Change.** The goal of this study is to understand the effect of RAD on PHA organization and operations, including staffing, structure, management practices, and fiscal impacts. The main data sources for this study are HUD administrative data, PHA documents, and in-person interviews with a sample of RAD PHAs. The study will use a qualitative framework analysis approach that includes the development of a descriptive framework, development of a codebook, identification of emerging themes, and interpretation of results.

Information Collection in This ICR

HUD is seeking onetime approval for the administration of the five instruments within this Information Collection Request (ICR), including:

- a. Census of RAD PHAs (Appendix A).
- b. Survey of RAD non-PHA property owners (Appendix B).
- c. Survey of a sample of choice mobility residents (Appendix C).
- d. Survey of a sample of non-choice mobility residents (Appendix D).
- e. Qualitative interviews with a sample of PHAs (Appendix E).

All of the data collection in this ICR will be performed by Econometrica and its subcontractor Urban Institute and SSRS. Each data collection activity is described below, followed by a summary table presenting the justification for each data collection instrument.

Census of RAD PHAs. The web-based census of approximately 500 participating PHAs with RAD conversions will collect data about the implementation of the choice mobility option and RAD PBV and PBRA financial and asset management information. The census will provide comprehensive information about the first three research components (choice mobility, long-term preservation and financial viability, and asset management). By systematically reaching out to all parties involved in RAD, the team will be able to gather information about the program. The analysis of this information will fulfil the purpose of the ICR to evaluate key aspects of RAD. The recruitment email and census of RAD PHAs are submitted as Appendix A.

Survey of RAD non-PHA property owners. The information collection is a web-based survey of approximately 350 non-PHA project owners/operators to gather information about the implementation of the choice mobility option, PBV financial condition, and PBV and PBRA asset management. The survey will provide more detail and a more complete picture of PBV and PBRA asset management and the use of choice mobility and impact on properties after conversion under RAD. The recruitment email and survey of RAD non-PHA property owners are submitted as Appendix B.

Survey of a sample of choice mobility residents. The information collection is a web-based and paper survey of a sample of residents who used the choice mobility option according to HUD administrative data. The survey will provide information about former RAD residents' experience using the choice mobility option, the reasons for moving, and satisfaction with the unit, property, and neighborhood. This is a survey of approximately 1,180 respondents. The

recruitment materials, informed consent, and survey of choice mobility residents are submitted as Appendix C.

Survey of a sample of non-choice mobility residents. The information collection is a web-based and paper survey of a sample of residents who live in a RAD property, are eligible for the choice mobility option but have not moved out from the RAD property and have not used the choice mobility option. The survey will provide information about RAD residents’ knowledge of the choice mobility option, the reasons for not moving, and satisfaction with the unit, property, and neighborhood. This sample of residents will serve as a comparison group for the survey of the residents who used the choice mobility option. This is vital for a statistically valid analysis. It will provide insight as to the reasons for any different outcomes for the two groups. This data collection is linked to the survey of choice mobility residents. This is a survey of approximately 420 respondents. The recruitment materials, informed consent, and survey of non-choice mobility residents are submitted as Appendix D.

Qualitative Interviews with a sample of PHAs. The fifth information collection is a series of interviews with PHA staff that are expected to be conducted in-person during site visits at approximately 25 PHAs. If travel restrictions due to the pandemic have not been lifted, the study will conduct virtual site-visits and video or telephone interviews. The interviews will provide qualitative data about changes in PHA organization and operations, staffing, structure, management practices, and fiscal impacts as a result of the RAD conversions. The recruitment letter and interview guides of qualitative interviews with PHAs are submitted as Appendix E.

The findings from the evaluation will be presented in interim and final reports to the Office of Policy Development and Research (PD&R). PD&R disseminates studies and publications through their Web site at www.huduser.org. HUD publication policies and procedures comply with all applicable Information Quality Guidelines.¹

Table 1 summarizes the need for each of the of information collections and each of the separate data collection instruments.

Table 1. Justification of Data Collection Instruments

Instruments	Respondents, Content, and Reason for Inclusion
Census of RAD PHA (Appendix A)	<p>Respondents: PHA Executive Director and other relevant staff at approximately 500 RAD PHAs</p> <p>Content:</p> <ul style="list-style-type: none"> • Background and RAD Property Information • Financial Information • Implementation of Choice Mobility • Asset Management <p>Reason: The census of RAD PHA will obtain RAD property ownership and financial information that is unavailable in HUD systems and critical to assess the long-term preservation and financial viability of RAD properties. The census will also collect information to assess the implementation and impact of the choice mobility option on residents, properties, and the voucher program. The census will ask about the availability of vouchers for choice mobility, choice mobility requests,</p>

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Instruments	Respondents, Content, and Reason for Inclusion
<p>Survey of RAD Non-PHA Property Owner (Appendix B)</p>	<p>waitlist management, choice mobility lease-up, and outreach and communication. Finally, the census will ask about asset management oversight and activities to determine the quality of asset management of RAD properties owned by the PHA.</p> <p>Respondents: Non-PHA owners of RAD properties, estimated to be approximately 350.</p> <p>Content:</p> <ul style="list-style-type: none"> • Implementation of Choice Mobility • Background and RAD Property Information • Asset Management • Financial Information <p>Reason: The survey will obtain project financial information for RAD properties that are not primarily owned and operated by PHAs. The survey will collect information to assess the role of property owners on the implementation of the choice mobility option and the impact of the option on properties' turnover and maintenance. Finally, the survey will ask about asset management oversight and activities to determine the quality of asset management of RAD properties that are not primarily owned and operated by PHAs.</p>
<p>Survey of choice mobility residents (Appendix C)</p>	<p>Respondents: RAD residents who have used the choice mobility option; sample of approximately 1,180 residents.</p> <p>Content:</p> <ul style="list-style-type: none"> • Background • Communications About Using a Voucher to Move • Using the Voucher to Move • Neighborhood Quality • Housing Quality and Property Maintenance • Housing Costs • Employment • Health • Resident Characteristics and Household Composition <p>Reason: The survey will obtain information about resident experience with choice mobility option and the reasons for moving. The survey will capture perceptions of neighborhood quality, housing cost and quality, and satisfaction with property maintenance to understand if choice mobility option is used to move to better units, properties, and neighborhoods. Finally, the survey will ask about employment and health status and resident and household characteristics that could affect the ability to use the choice mobility option and move.</p>
<p>Survey of non-choice mobility residents (Appendix D)</p>	<p>Respondents: RAD residents who are eligible but have not used the choice mobility option; sample of approximately 420 residents.</p> <p>Content:</p> <ul style="list-style-type: none"> • Background • Neighborhood Quality • Housing Quality and Property Maintenance • Housing Costs • Employment • Health • Resident Characteristics and Household Composition • Decision to Request a Voucher to Move • Not Requesting the Voucher to Move • Requesting the Voucher to Move

Instruments	Respondents, Content, and Reason for Inclusion
	<p>Reason: The survey will capture perceptions of neighborhood quality, housing cost and quality, and satisfaction with property maintenance to understand if choice mobility option was not used to move because residents are satisfied with their RAD units, properties, and neighborhoods. The survey will ask about employment and health status and resident and household characteristics that could affect the ability to use the choice mobility option and move. Finally, the survey will ask whether residents did/did not request a voucher and the reasons for requesting/not requesting a voucher under the choice mobility option.</p>
<p>Qualitative interviews with PHAs (Appendix E)</p>	<p>Respondents: Representative group of 25 PHAs with RAD conversions.</p> <p>Content:</p> <ul style="list-style-type: none"> • Types of ownership structure • Organizational changes • Changes in functions and staffing • Changes in operating costs • Effect on administrative fees <p>Reason: The interviews are expected to be conducted with PHA executive directors, staff dedicated to RAD projects, finance or budget directors, asset managers, and/or directors of public housing and voucher programs. The interviews will provide qualitative data to understand how the different types of ownership structures may impact the organization of the PHA. Different activities, such as new construction or rehabilitation, may require organizational adjustments. Adjustments may also be affected by the previous experience of PHAs with these types of activities. PHAs may change their property management practices or outsource them, which could have a direct impact on organizational responsibilities. If not all the properties have been converted under RAD, we are interested in examining how the PHA handles that organizationally.</p>

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.

Our information collections include (1) in-person/virtual interviews as part of site visits, (2) web-based censuses and surveys of PHA staff, owners and managers of RAD properties, and residents, and (3) telephone surveys of non-respondents to the web-based survey. If travel restrictions are in place or if travel is otherwise deemed inadvisable due to Covid-19, concerns about the adequacy of testing, social unrest, or other reasons, interviews will be conducted virtually using common videoconferencing services, such as Zoom or Teams. In all cases, respondents will also be provided a toll-free telephone number as an alternate mode of access. Web-based surveys are now widely used in social science research, through which the recipients have the ability to complete the survey online at their convenience. The web-based survey instrument contains instructions, help screens, definitions, automated skip patterns, and other aids that guide respondents through the survey and reduce respondent burden.

We will conduct the census of RAD PHAs using a web-based data collection instrument that we will invite PHA staff from PHAs with RAD conversions to complete. A web-based instrument will also be used for the census of all property owners/managers involved with our sample of PHAs with RAD conversions identified in the prior surveys/censuses.

We will also use a web-based instrument to conduct a survey of a sample of residents of RAD-converted developments who used choice mobility and a survey of a sample of residents who were eligible to use choice mobility but remained in their RAD-converted developments.

Additional key features include:

- Secure data entry.
- User login save/review and submit capabilities.
- Navigation to access different sections.
- Navigation to access different screens sequentially or non-sequentially.
- Interactive features to address questions.

We will launch the survey via an integrated system capable of sending personalized email cover letters, tracking which of the respondents have not completed the survey, and sending out reminders. The survey will be administered by SSRS, a survey research firm. The responses will be shared with Econometrica team members only. One hundred percent of the data gathered through the Web survey will be collected electronically.

Using a web-based system for most of the data collection efforts will reduce the burden on the respondents by reducing the time involved to complete and submit the information. Burden will also be reduced for all data requests by sharing some of the questions ahead of time and allowing participants to prepare for in-person or telephone interviews.

The use of a phone-in option for completion of the resident survey will reduce the burden represented by a web survey for residents without a data plan or with data caps.

For the interviews with PHA staff about the impact of RAD on PHA organization, we will reduce the burden on staff who are interviewed by identifying relevant staff prior to the site visit, providing advance copies of the interview protocols, and recording and preparing transcripts of the interviews (if interviewees agree).

All information will be protected and held confidentially.

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.

There is no existing data source that can readily be analyzed to document the program impact as required under the program’s authorizing statute, namely (1) the preservation and improvement of former public housing units, (2) the amount of private capital leveraged as a result of such conversions, and (3) the effect of conversion on residents. All available data from HUD administrative sources and RAD applications will be incorporated into the analysis file by the research team.

The proposed surveys and censuses are specific to the RAD evaluation. Residents may have been asked to participate in the prior RAD evaluation but the information being requested for this project is different and also at a different point in time. It is unique to this study. Additional contact information requested is not reliably available from other sources, such as the PHA.

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.

Small businesses or other small entities are not part of the target population of this information collection effort. The information collection is limited to RAD program participants, other public housing developments that are similar to the program participants chosen for comparison, PHA representatives, PHA partners, owners and managers of RAD properties, and residents who will be asked to complete a survey.

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.

Collecting data directly from PHA staff, development owners, and residents is the best and only way to reliably evaluate the impact of the RAD program in the topic areas covered by this study. HUD’s ability to obtain this information is vital for reporting the impact of the program on residents as well as for assessing long-term financial viability, asset management, and effect on PHAs.

This is a onetime data collection effort, and an inability to collect this data will render HUD unable to assess the overall impact of the RAD program.

7. 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 1320.6 (Controlling Paperwork Burdens on the Public – General Information Collection Guidelines). There are no special circumstances that would require this information collection to be conducted in a manner that would be inconsistent with OMB guidelines. The following below are “**Not Applicable**” to this collection:

- requiring respondents to report information to the agency more than quarterly – “**Not Applicable**”;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it – “**Not Applicable**”;
- requiring respondents to submit more than an original and two copies of any document – “**Not Applicable**”;
- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years – “**Not Applicable**”;
- in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study – “**Not Applicable**”;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB – “**Not Applicable**”;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use – “**Not Applicable**”; or
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law – “**Not Applicable**”.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

- **Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported.**
- **Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.**

In accordance with the Paperwork Reduction Act of 1995, HUD published a 60-Day Notice of Proposed Information Collection in the *Federal Register* on June 9, 2020. The docket number was **FR-7029-N-05**, and the notice appeared on pages 35328-35329. The notice provided a 60-day period for public comments, and comments were due by August 10, 2020. HUD received a request from Mr. Jim Armstrong, who works with the Public Housing Authorities Directors Association (PHADA), to obtain the draft survey instruments. HUD submitted the draft survey instruments to Mr. Armstrong on 7/9/2020. On 8/7/2020, HUD received comments from Mr. David Weber, a policy analysis at PHADA. HUD submitted a response to Mr. David Weber addressing his comments on 2/24/2021.

The RAD Choice Mobility and Long-term Affordability Evaluation was developed and is being implemented with the assistance of Econometrica Inc, The Urban Institute, and SSRS, the study’s prime and sub-contractors, respectively. In addition, the research includes an outside Technical Expert Panel (TEP), consisting of eight professionals with knowledge and experience of a range of relevant disciplines, including the asset management of affordable housing, data systems used in asset management, public housing authority programs and practices, including the HCV program, the choice mobility option, financial performance metrics for public and assisted housing, real estate management, survey methods, research design, and statistical analysis. See the table below for the members of the TEP. These professionals reviewed and commented on the research design and met in a working group in January 2020, where they provided input on the proposed data collection, including the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, and the data elements to be collected.

Table 2. TEP Members

Area of Expertise	Name	Title and Affiliation
Real Estate Asset Management	Peter Desjardins	Vice President of Asset Management, Volunteers of America
	Jenny Netzer	Chief Executive Officer, TCAM- MRI
Choice Mobility Option	Amy Ginger	Deputy Director of Operations, Department of Housing and Community Development, Fairfax County
	Megan Haberle	Deputy Director of Poverty & Race Research Action Council (PRRAC)
Financial Performance of Affordable Housing Properties	Michael Petro	Vice President of Finance, Nan McKay & Associates
	Dustin Read, J.D., Ph.D.	Associate Professor of Real Estate, Virginia Tech University
Quasi-experimental research design methods	Michael Brick, Ph.D.	Senior Vice President, Statistical Sciences & Research, Westat
Survey research methods	Steve Bell, Ph.D.	Vice President. Economist, Westat

Econometrica and the Urban Institute conducted virtual interviews at nine sites with PHA staff, property managers, and residents. These interviews informed the development of survey instruments by confirming the availability of data and collecting information on context to ensure questions are relevant.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

There are no payments or gifts to respondents of the census of RAD PHA, the survey of RAD property owners, and the qualitative interviews with PHAs.

The study design involves offering a combination of unconditional and post-survey incentives to respondents of the two resident surveys, who are currently or were at one time living in RAD developments. These types of incentive are shown to improve response rates.

The letter inviting residents to take the survey will include a small unconditional pre-incentive of \$5. Those who complete the survey will then receive a \$45 incentive. Those who do not respond to the initial letter will receive two reminders and, finally, a hard copy of the survey to fill. If the response rate is below 80 percent following the letter reminder, a sample of non-responders will be selected for attempted contact by phone. Those who complete the survey by phone will receive the \$45 incentive, plus an additional \$10 incentive.

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

HUD's contractor, Econometrica, provides written assurances of confidentiality to all survey respondents. Econometrica has established stringent procedures and safeguards for securing and protecting against inappropriate disclosure or release of confidential information that will be collected during this evaluation. Where opinions are elicited from individuals, the confidentiality agreement stands; the data that Econometrica provides to HUD will be purged of information that would enable the Department to identify a specific individual, including a PHA official, offering personal and confidential opinions. This will not apply to the bulk of information that is collected, but only to that information that is of a personal and confidential nature as indicated on the survey.

All respondents included in the study will be informed that information they provide will be used only for the purpose of this research. The information will not be used by HUD for grantee monitoring. All Econometrica team members that will have access to these data will sign "Assurances of Confidentiality" pledges.

The statutory authority related to HUD's ability to conduct research through a contract with Econometrica is summarized below:

- a. Section 3(b) of the Department of Housing and Urban Development Act, as amended, 42 U.S.C. 3532, authorizes the Secretary to "conduct continuing comprehensive studies, and make available findings, with respect to the problems of housing and urban development."
- b. Section 7(r)(1) of the Department of Housing and Urban Development Act, as amended, 42 U.S.C. 3535, provides that appropriated funds "shall be available to the Secretary for evaluating and monitoring of all such programs . . . and collecting and maintaining data for such purposes." Subsection (r)(4)(a) of the act further provides that the Secretary "may provide for evaluation and monitoring under this subsection and collecting and maintaining data for such purposes directly or by grants, contracts, or interagency agreements."
- c. Section 502(g) of title V of the Housing and Urban Development Act of 1970, as amended, 12 USC 1701z-2 (g), authorizes the Secretary "to request and receive such information or data as he deems appropriate from private individuals and organizations, and from public agencies." It further provides that "[a]ny such information or data shall be used only for the purposes for which it is supplied, and no publication shall be made by the Secretary whereby the information or data furnished by any particular person or establishment can be identified, except with the consent of such person or establishment."

Prior to beginning data collection, HUD will revise the System of Records Notice (SORN) no. PD&R/RRE.01, “Rental Assistance Demonstration (RAD) Program Evaluation Data Files,” approved on 02/23/2015. This SORN was established for the prior evaluation of the RAD program.

Each contact person selected to respond to the web survey will be given a link to access and complete the survey. For the Web survey respondents and the interviewees, Econometrica will provide a clear overview of the study’s purpose, reasons why it would be in the interest of the program to respond, an assurance as to the legitimacy of the survey, and the name of a person the respondent can contact directly if the respondent has questions.

All research protocols have been reviewed and approved by Urban Institute’s internal Institutional Review Board (IRB). The Urban Institute maintains an Institutional Review Board (IRB) to ensure that research practices and procedures effectively protect the rights and welfare of human subjects, consistent with the requirements set forth in Title 45, Part 46, of the *Code of Federal Regulations* (45 CFR 46). The Urban Institute’s policy is that all research involving human subjects must adhere to the following principles, among others:

- Risks to human subjects from research must be reasonable in relation to anticipated benefits and must be minimized to the extent possible.
- Human subjects must be fully and accurately informed of the nature of the research in which they will be involved, whether their participation is mandatory or voluntary, any consequences of non-participation, any risks associated with their participation, and how the research will be used.
- Adequate provision must be made to protect the privacy of human subjects and to maintain the confidentiality of data that are collected, where promised and as appropriate.

In accordance with these policies, the full research team will maintain the following procedures:

- Prior to collecting data from all respondents, **informed consent** will be administered. They will be given a clear overview of the study and its goals, the data security plan, the staff confidentiality agreement, and our methods for safeguarding anonymity in our reports and publications. We will stress the voluntary nature of participation and make clear that there are no negative consequences for those who choose not to participate. For residents, this information will be provided in letter requesting their participation and in the survey introduction. For PHA and property owner/operator respondents, the information will be provided in the invitation emails and in the survey introduction.
- The research team will safeguard the information gathered. Data gathered from the census of residents will be analyzed and discussed exclusively in the aggregate; no published reports using the data will single out any particular residents. Information identifying particular respondents will be shared only with staff members who have signed Data Confidentiality Pledges and who need the information for research purposes. All such staff members will sign this pledge. Hard-copy materials containing respondent identifying information will be locked up when not in use, and electronic materials with

identifying information will be stored on a secure server in password-protected and/or encrypted files, where appropriate.

We will make arrangements for HUD to transfer administrative data on residents through Secure File Transfer Protocol (SFTP) or another secure method. All raw and summarized data will be securely stored per HUD protocol, including proper password protection and encryption, as required, for files containing PII. We will also ensure that all data and summary files are de-identified before transfer to HUD.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The two resident surveys include questions on household rent and utility payments, as well as employment and for residents' general assessment of their own health.

It is necessary to ask for information about rent and utility payments to help the research team understand the impact of choice mobility on residents' direct living costs, i.e., rent and utility payments. Specifically, the research seeks to understand whether households who use a choice mobility voucher to move, end up paying more, the same or less for rent and utilities and whether they have difficulty paying their utility bills.

The surveys ask about employment and health because these factors affect households' willingness and motivation to move or stay. The research seeks to understand whether households use choice mobility vouchers to improve their health or employment prospects, or whether they choose to remain in their existing unit to preserve current health or employment relations. Health and employment information will be used along with other information as explanatory variables to understand why some households use choice mobility vouchers and other households do not.

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.

Burden Hours: Table 3 demonstrates how the burden hours are calculated.

Table 3. Response Burden Table

Information Collection	Number of Respondents	Frequency of Response	Responses per Annum	Burden Hour per Response	Annual Burden Hours	Hourly Cost per Response	Annual Cost
Census of RAD PHA	400	1	400	0.75	300.00	\$34.46	\$10,338.00
Survey of RAD non-PHA Property Owners	228	1	228	0.33	75.24	\$34.46	\$2,592.77
Survey of choice mobility residents	708	1	708	0.33	233.64	\$28.62	\$6,686.78
Survey of non-choice mobility residents	231	1	231	0.33	76.23	\$28.62	\$2,181.70
Interview of PHA staff on organizational changes	250	1	250	1.5	375.00	\$34.46	\$12,922.50
Total	1,817	N/A	1,817	N/A	1,060.11	N/A	\$34,721.75

Source: Table B-3. Average hourly and weekly earnings of all employees on private nonfarm payrolls by industry sector, seasonally adjusted. U.S. Bureau of Labor Statistics. March 2020(P) for all private sector (\$28.62) and professional and business services (\$34.46). <https://www.bls.gov/news.release/empsit.t19.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.**

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 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.

This data collection for the RAD Choice Mobility and Long-term Affordability Evaluation is being carried out under a HUD contract with Econometrica and its subcontractors, the Urban Institute and SSRS. The estimated cost to the Federal government for this data collection totals \$583,290.

The cost of the data collection to the Federal government is based on: (i) 900 contractor's labor hours to develop and complete surveys and interviews for the study; (ii) 3,285 contractor's labor hours to maintain survey website, contact non-respondents, and answer questions; and (iii) \$52,080 in incentives to respondents of the surveys to choice mobility residents and to non-choice mobility residents.

The data collection costs are one-time costs based on the competitively bid and awarded contract 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 ICR is a new request and does not result from any program changes or adjustments.

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 results of the evaluation covered by this ICR will be documented in a second interim report and a final report to HUD, the latter of which is currently scheduled to be delivered in November 2021. In this report, Econometrica will provide summary aggregated data documenting study findings. HUD plans to publish the findings of the evaluation on their Web site, located at www.huduser.org, at the conclusion of the study.

Data will be collected and stored in Microsoft Excel files. Data analysis will be primarily conducted using SAS or Stata.

Table 4 provides a timeline for the data collection for the three study components.

Table 4. Data Collection and Reporting Timeline

Task	Start Date	End Date
Census of RAD PHAs	OMB approval date	3 months after OMB approval
Second interim report	After completing Census RAD PHAs	2 months after start date
Survey of RAD non-PHA Property Owners	2 months after completing RAD PHA survey	2.5 months after start of survey
Survey of choice mobility residents	2 months after completing RAD PHA survey	2.5 months after start of survey
Survey of non-choice mobility residents	2 months after completing RAD PHA survey	2.5 months after start of survey
PHA organizational change site visits	OMB approval date	9 months after OMB approval
PHA organizational change report	After initial site visit	3 months after final site visit
Final report	After completing survey of RAD non-PHA property owners and residents	3 months after start date

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 created for the RAD evaluation 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).