

**Supporting Statement Part, A for Paperwork Reduction Act Submission**  
**Rent Reform Demonstration: 6-Year Follow-Up**  
**OMB Control # 2528-0306**

**Part A. Justification**

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

This is revision of a currently approved collection. This research is conducted under the authority of the Secretary of the U.S. Department of Housing and Urban Development (HUD) to undertake programs of research, studies, testing and demonstration related to HUD's mission and programs as deemed to be necessary and appropriate (12 USC 1701z-1 et seq.).

This supporting statement provides information on the ongoing data collection activities associated with the Rent Reform Demonstration, commissioned by the HUD. The rent policy being tested as part of this demonstration was developed by a design team, which includes: MDRC and its subcontractors at the Urban Institute, Quadel Consulting, the Bronner Group, and independent and academic consultants; HUD; and participating housing agencies. MDRC is leading the evaluation effort.

The evaluation will document the progress of a group of housing voucher holders, drawn from current residents, and the impact of the alternative rent system on the families as well as the administrative burden on Public Housing Agencies (PHAs). Three PHAs continue to participate in the long-term evaluation<sup>1</sup>: (1) Lexington Housing Authority (LHA), Lexington, Kentucky; (2) Louisville Metro Housing Authority (LMHA), Louisville, Kentucky; (3) San Antonio Housing Authority (SAHA), San Antonio, Texas.

Data for this evaluation will be gathered through a variety of methods, including administrative records, interviews, direct observation, and analysis of financial documents and administrative records. This information request focuses on the Rent Reform Demonstrations' data collection efforts for the 6-Year Follow-Up Study, the final phase of this multi-year evaluation. The data collection activities, which build on similar activities conducted during earlier phases of the evaluation, include: 1) interviews with PHA staff to understand new rent policy implementation and experiences, 2) interviews with study participants to understand their experiences with the new rent policy, and 3) housing agency cost data.

### **Background and Policy Context**

Since the passage of the Brooke Amendment in 1969, rents in subsidized housing have been directly tied to income. A variety of stakeholders have advocated reform of the rent system,

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<sup>1</sup> A fourth PHA, the District of Columbia Housing Authority (DCHA), stopped operating the new rent policy in Q4/2019.

some emphasizing its adverse impacts on beneficiaries (and eligible non-beneficiaries) and others emphasizing its impacts on PHAs and their finances. Rent reform has been elusive, however, because moving to a new system involves some fundamental tradeoffs around which agreement has been hard to achieve. For example, simplifying the rent structure may make it more difficult to ensure that tenants with the greatest need receive the most assistance. At the same time, offering deep subsidies for an unlimited term makes it difficult to serve equally needy families on waiting lists -- given a fixed appropriation level. Also, the advantages of standards and protections built into a common federal approach must be weighed against the benefits of allowing local agencies to set rent rules based on local conditions. And finding the right balance in the mission of housing assistance between a strict focus on providing decent affordable housing versus other objectives, such as family self-sufficiency, is another source of tension among stakeholders.

In September 2012, HUD commissioned a national evaluation of alternatives to the current rent structure for households receiving vouchers from Moving-to-Work (MTW) PHAs, *which have the statutory authority to change rent rules*. While the current income-based system protects most tenants against excessively burdensome rents (in general, the portion of rent that the voucher holder is responsible for is 30 percent of the household's adjusted income), it may also encourage underreporting of income and a reduction in work effort leading to lower earned income.

The key goals considered in the design of the alternative policy include: 1) increasing work effort and earnings for voucher families, 2) simplifying administration of vouchers, and 3) cost-neutrality for Moving-to-Work housing authorities via administrative efficiencies or restructuring (simplification) – all while sustaining the voucher program's important role in reducing homelessness and serving more families with housing assistance.

### **Key Features of the Alternative Rent Model**

The MDRC team has consulted extensively with HUD program and research staff, advocacy organizations, (MTW) PHAs, and consulting organizations that support the activities of PHAs. Following on this process, an alternative rent model is taking the shape of a framework with several fundamental features while leaving some room for PHA discretion in adapting those features to local conditions.

The alternative rent policy will apply only to Housing Choice Voucher (HCV) recipients and include the following key features:

- **Simplifying the calculation of the household's total tenant payment (TTP) and subsidy amount by:**
  - (a) Eliminating deductions and allowances,
  - (b) Changing the percent of income that a household pays for its share, from 30 percent of *adjusted income* to 28 percent of *gross income*,
  - (c) Ignoring a household's income from assets when the total value of its assets is \$25,000 or less, and

(d) Simplifying the policy for determining utility allowances.

- **Using *retrospective* income in setting a household’s TTP and housing subsidy** (to discourage intentional reductions in income)
- **Establishing a minimum TTP of at least \$50 and requiring that all households pay a minimum amount of rent directly to the landlord**, to mirror the landlord-tenant relationship in the non-subsidized rental market
- **Conducting income recertifications triennially rather than annually**, so that earnings gains do not increase TTP for three years (thus creating a strong work incentive by eliminating, for an extended period, the implicit housing-subsidy-related “tax” on increased earnings)
- **Limiting household-requested interim recertifications to a maximum of one per year**, to protect households when their income drops while limiting the burden to the housing agency
- **Establishing a suitable hardship policy** that identifies a standard set of hardship conditions and remedies to protect households from excessive rent burdens.

To increase the likelihood that the alternative rent policy encourages tenants to increase their work efforts, it will be important to inform them clearly and periodically of the implicit incentives associated with not having to report any earnings gains for three years. They must also understand the safeguards in place to protect them from excessive rent burdens if their incomes fall. The MDRC team, as part of its technical assistance role, will help housing authorities develop appropriate materials and strategies for communicating these incentives and safeguards.

#### *Local variations allowed*

As previously indicated, the housing agencies that are participating in the demonstration helped to develop and support this common framework. However, they also saw a need for some local adaptations of the model in response to local considerations. For example, the need to set the minimum TTP at different levels. The process for determining hardship remedies (although not the conditions defining a hardship or the remedies themselves) may also vary. The design team attempted to strike an effective balance between the extent of standardization that would be required in a national policy and the need to permit some local flexibility that may also be reasonable to include within a national policy.

#### *Eligibility*

The alternative rent policy will apply only to HCV recipients. Eligible sample members will include voucher holders with vouchers that are administered under the (MTW) demonstration. Non-MTW Vouchers (i.e., Veterans Assisted Special Housing, Moderate

Rehabilitation, and Shelter Plus Care), Enhanced Vouchers, and Project-Based Vouchers are excluded from the study. Households that have ported out are excluded. Additionally, the study is focused on work-able populations and will not include elderly households, disabled households, households that will become elderly during the course of the long-term study, or households where at least one member does not have legal status in the U.S. Households receiving a childcare deduction at the time of random assignment will also be excluded from the study. Households currently participating in the PHA's Family Self-Sufficiency, homeownership programs, or any of the PHA's special programs with partner agencies will not be included in the study. Lastly, households who have 0 HAP at the time of random assignment will not be included in the study.

### **Evaluation design and components**

The demonstration will use a randomized controlled experiment to compare the current rent subsidy policy for HCV to an alternative rent policy. Four MTW PHAs will participate in the study. The demonstration is being guided by a comprehensive research agenda structured around three study components: impacts, implementation processes, and cost analysis.

In order to evaluate the impacts of the alternative rent policy, all households that meet the eligibility requirements for the demonstration are being randomly assigned to either a new policy group or an existing rent policy group (i.e., the control group). Households will not have an opportunity to switch their assignment from one rent policy group to the other. This approach is consistent with the MTW Demonstration's policy of authorizing PHAs to implement and test innovative rent policies to try to help voucher holders become self-sufficient and to reduce administrative costs. When MTW PHAs that are not part of the Rent Reform Demonstration have implemented their own rent reforms, they have not been expected to limit these new policies to tenants who volunteer for them.

A research design that includes the broader eligible population fits the compelling need for HUD and Congress to understand the effectiveness of the new rent policy for the full eligible population, not just for a subset of volunteers recruited for a special demonstration project. For a variety of reasons, volunteers may not adequately represent the full eligible population. The new rent policy itself offers all tenants the possibility of becoming economically better off, while also including a number of safeguards intended to help prevent them from becoming economically worse off. (All tenants will be given an opportunity to withdraw from having their personally identifiable data shared with the researchers if they wish that it not be disclosed.)

The evaluation plan includes an exception for one of its sites, the LMHA. Households in this PHA that are randomly assigned to the new policy will be given the option to opt out of the new rent policy group in addition to withdrawing from having their data disclosed to the researchers. HUD agreed to this exception to be responsive to concerns raised by LMHA and the local community.

The study examines the effects of the alternative policy from two perspectives: that of the housing agencies and that of the voucher holders. It draws on agency administrative records

(housing, TANF/SNAP, homelessness), wage records from the National Database of New Hires (NDNH), baseline and follow-up surveys, and field research.

**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 primary goal of the project is to test the effects of an alternative rent policy on voucher holders and housing authorities that issue them. HUD authorized the evaluation of the Rent Reform options following the Office of Policy Development and Research statement of policy objectives and initiatives for 2011 (“2011 report”)

([http://hud.gov/offices/cfo/reports/2011/cjs/Research\\_and\\_Technology\\_2011.pdf](http://hud.gov/offices/cfo/reports/2011/cjs/Research_and_Technology_2011.pdf)).

Under Title V of the Housing and Urban Development Act of 1970, as amended, the Secretary is authorized and directed to conduct demonstration projects, evaluations, and research that relate to the mission of the Department. The policy objectives for 2011 set forth the Office’s proposal to support the government-wide initiative to strengthen program evaluation by underwriting rigorous evaluations of three demonstrations, including the Rent Reform option demonstration (2011 report). The Office’s proposed support would supplement funding from the Transformation Initiative.

The report referenced the approval by the Office of Management and Budget of specific evaluation proposals for 2011, which included the study of Rent Reform options. Further, it underscored HUD’s commitment to “strong, independent evaluations that can inform policy and program management decisions” (2011 report, page 0-12).

As described in previous OMB submissions for this study, the Rent Reform Demonstration was designed to test, and “systematically observe,” methods for creating incentives, and removing related disincentives, for tenants to increase their earnings (2011 report, page 0-13).

To date, the evaluation team has produced three formal reports, a fourth is going through HUD Departmental clearance, and a final report will be published at the end of this evaluation. Published reports include:

Riccio, James, Nandita Verma, and Victoria Deitch. 2019. *The Rent Reform Demonstration: Interim Findings on Implementation, Work, and Other Outcomes*. New York: MDRC.

Riccio, James, and Victoria Deitch. 2019. *The Rent Reform Demonstration: Early Effects on Employment and Housing Subsidies*. New York: MDRC.

Riccio, James, Victoria Deitch, and Nandita Verma. 2017. *Reducing Work Disincentives in the Housing Choice Voucher Program: Rent Reform Demonstration Baseline Report*. New York: MDRC.

**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.**

Wherever possible, advanced technology will be used in data collection efforts to reduce burden on study participants and on site staff. As it pertains to the 6-Year Follow-Up Study, where relevant person-level data has been identified as available through an accessible, centralized, and computerized source, that source is being pursued. For example, MDRC has developed a schedule with HUD to request records from the NDNH database to analyze study participants' longer-term employment and earnings. While program implementation data collection relies on evaluation staff efforts on-site, we have sought, wherever possible, to minimize overlap between questions we include in implementation research protocols and information that is available through PHA data and other administrative records.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

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

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1) describe any methods used to minimize burden.**

We do not anticipate that this study will burden small businesses.

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

This evaluation represents an important opportunity for the Federal government to build a body of knowledge about the implementation and the effects of an alternative rent policy. This is consistent with the Administration's strong focus on evidence-based policymaking. If this study is not conducted and the longer-term follow-up data not collected, analyzed, reported, and disseminated, Federal and local program or policy decisions will not be informed by robust and high-quality evidence upon which to base critical decisions regarding future rent policy.

**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 (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.**

a. Federal Register Notice and Comments

In accordance with 5 CFR § 1320.8 (d), a Notice of Proposed Information Collection for publication in the Federal register was prepared to announce the agency’s intention to request an OMB review of supplemental data collection activities for the Rent Reform Demonstration. HUD published a 60-Day Notice of Proposed Information Collection in the Federal Register on 12/18/2020 (Docket No. FR-7029-N-11, pages, 82498 - 82499). The notice provided a 60-day period for public comments, with comments due February 16, 2021. No public comments have been received.

b. Consultations Outside of the Agency

During study design, we have sought the input of nationally recognized experts on public housing and Section 8 housing support, including Professors John Goering (City University of New York) and Ingrid Gould-Ellen (New York University).

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

As a token of appreciation, the research team is offering a \$30 incentive to study participants who participate in a scheduled interview for the implementation research (up to 20 study participants per site, for a total of 60). Small incentives were also offered to respondents who participated in earlier rounds of implementation research interviews (for example, Task Orders 1 and 2) or the follow-up survey, conducted by Decisions Information Systems.

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

For the full evaluation, strong protections have been implemented to maintain the privacy of tenants in all study sites, to the extent permitted by law. At study enrollment in 2015-2016, participants were provided an information sheet (see appendix), which indicated that: members of the research team would follow strict rules to protect all of the data; that no data would be disclosed to outside parties; and all personally identifiable data on sample members would be destroyed or returned to their respective agency upon the conclusion of the study. The same Information Sheet also informed study participants that they could withdraw from having their personally identifiable data shared with MDRC or its research partners. Tenants were notified about this opportunity as part of the normal certification processes, both at study enrollment and subsequent triennial recertification. This process was approved by MDRC's IRB and by HUD (also approved by OMB). Tenants may withdraw from data disclosure by contacting MDRC.

As previously described, MDRC will collect data on each household from HUD 50058 forms prior to random assignment and for the duration of the study. NDNH are being obtained through HUD to track participants' employment and training. MDRC has agreements with state and local agencies to collect public assistance and homelessness data. In all circumstances, MDRC will protect the confidentiality of the data it collects through its regular high-security safeguards and practices. All tenants will be informed that any personal information they provide or allow access to for the study will be used only for this purpose. Individuals will not be identified in prepared reports. All research staff working on the project have been trained to protect private information and have signed a pledge stating that they will keep all information gathered private to the extent permissible by law. All papers that contain study participant names or other identifying information will be kept in locked areas and any computer documents containing identifying information will be protected with a password.

The interview guides used for the evaluation also assure respondents that their information will not be disclosed.



- 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.**

As with similar data collection efforts completed as part of the Rent Reform demonstration, the qualitative data collection will focus on staff and participant experiences with the alternative and current rent policies. Questions of a sensitive nature are not included in the interview protocols, but respondents will also be informed prior to their interview with MDRC staff that they may refuse to answer any question and that their responses will be used in the aggregate (and that individuals will not be identified by name).

- 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 projected burden estimates for data collection for PHA staff and participants is outlined in Exhibit A-1 below. These estimates assume the maximum possible number of study participants. The estimates are based on MDRC's experience with previous rounds of data collection for the Rent Reform demonstration and other random assignment studies involving similar populations and data collection. The total annual cost burden to respondents is approximately \$2,311.70.

**Exhibit A-1: Estimated Hour and Cost Burden of Information Collection**

<b>Information Collection</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Responses Per Annum</b>	<b>Burden Hour Per Response</b>	<b>Annual Burden Hours</b>	<b>Hourly Cost Per Response</b>	<b>Annual Cost</b>
Study Participant Interviews	60	1	60	1.5	90	\$7.25	\$652.50
PHA Supervisor Interviews	9	1	9	1.5	14	\$42.17	\$590.38
PHA Specialist Staff Interviews	15	1	15	1.5	23	\$25.64	\$589.72
Cost Study Data Collection Activities with PHA staff	9	1	9	2	18	\$28.50	\$513.00
<b>TOTAL</b>	<b>93</b>				<b>145</b>		<b>\$2,345.60</b>

The annual estimated cost burden to study participants is \$652.50, based on the estimated hourly wage at the expected prevailing minimum wage, which is \$7.25 per hour in Kentucky and Texas and the expectation that 50 percent of the participants will be employed at the time of the field research. For 60 respondents taking 1.5 hours to complete the survey, the total cost would be \$652.50.

The annual estimated cost burden is \$590.38 for the 9 PHA Supervisor interviews (about 90 minutes each), using the median hourly wage for Social and Community Service Managers for Local Government of \$42.17. The annual estimated cost burden is \$598.72 for 15 PHA Specialist staff interviews (about 90 minutes each), using the median hourly wage for Community Social Service Specialist for Local Government of \$25.64. This cost burden is estimated using the median hourly wages of selected occupations (Community and Social Service Specialist and Manager), classified by Standard Occupational Classification (SOC) codes, from the Occupational Employment Statistics of the U.S. Department of Labor’s Bureau of Labor Statistics, accessed online July 16, 2021 at [http://www.bls.gov/oes/current/oes\\_stru.htm](http://www.bls.gov/oes/current/oes_stru.htm).

The annual estimated cost burden for the Cost Study data collection with 9 staff is \$513.00. This data collection assumes 2 managers and 1 specialist will be interviewed per site. The weighted average of the hourly wage for this respondent is \$28.50.

Other costs, if any, incurred by the housing agency will be estimated in the cost study portion of the study (it is not known, but is in fact a study outcome of interest).

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.**

At the start of the demonstration, the alternative rent policy implementation required the PHAs to modify their existing data systems to capture the newly implemented rent rules. HUD provided each housing agency \$150,000 to offset the one-time software modification costs, which annualized over the 6-year demonstration are \$25,000 per year.

This data collection effort involves no additional recordkeeping 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 the qualitative study, the subject of this application, is \$202,211. This cost includes labor hours for site visits, qualitative data collection, coding, and processing and analysis of data for the final deliverable. The cost of the data collection is based on the contractor's budget for the work, which is based on the cost of the previous qualitative study conducted at an earlier phase in the demonstration.

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

This submission reflects the data needs of the Rent Reform Demonstration’s 6-Year Follow-Up study (contract no: 86614619C0009), particularly its qualitative data collection. This submission is a revision of a currently approved collection.

**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 6-Year Follow-Up evaluation covers the period from 9/30/19 – 3/31/24. The qualitative data collection, the subject of this submission, is slated for the period from October 2021 to March 2022. Over a 4- to 5-month period, the MDRC team will schedule and conduct staff and participant interviews.

The analyses proposed for the 6-Year Follow-Up evaluation will build on the analytic methods used in earlier phases of the Rent Reform Demonstration. Once the qualitative interviews are completed, the research team will code the responses and analyze key observations and takeaways from staff and participant interviews. The team will also examine the same data to distill site-specific and cross-site themes. These findings, along with other quantitative data analyzed for this longer-term study, will feature in the final report for this project, due to HUD 9/6/2023. MDRC will submit two drafts of the report before finalizing the report for HUD’s editing and publication process (see Exhibit A-2). The report is expected to be published by the end of the contract, March 31, 2024.

**Exhibit A-2 Report Schedule for the Rent Reform Demonstration’s 6-Year Follow-Up Study**

Final Report	
1 <sup>st</sup> Draft	5/3/2023
2 <sup>nd</sup> Draft	6/28/2023
Final due to HUD	9/6/2023

**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 any 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.