**Supporting Statement for Paperwork Reduction Act Submission**

**Evaluation of Public Housing Agencies (PHA) Coronavirus Aid, Relief, and Economic Security (CARES) Act Waivers: PHA Interviews Data Collection**

**OMB Control # 2528-XXX**

**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 U.S. Department of Housing and Urban Development (HUD)’s Office of Policy Development and Research (PD&R) is undertaking an evaluation of waivers authorized under the 2020 Coronavirus Aid, Relief, and Economic Security (CARES) Act. The purpose of this study is to understand how Public Housing Authorities (PHAs) implemented the waivers the utility of these waivers on PHA operations and assisted households. The insights from PHAs will inform future policy and program implications related to the PHA waivers and related flexibilities. HUD contracted with 2M Research for this evaluation. This research is conducted under the authority of the HUD Secretary to undertake programs of research, studies, testing, and demonstration related to the mission and programs of HUD (12 USC 1701z-1 et seq.).

**Background: CARES Act Waivers**

Signed into law on March 27, 2020, the CARES Act gave HUD broad authority to temporarily waive statutes and regulations for PHA programs. This law intended to help PHAs and residents mitigate challenges related to the COVID-19 Pandemic by allowing for administrative flexibilities to encourage the continuity of critical PHA operations and the support of PHA residents and tenants. Examples of pandemic related challenges experienced by PHAs and assisted households included difficulties with maintaining in-person inspections while communities were asked to limit in-person encounters to reduce the spread of COVID-19, or challenges enforcing income-based PHA requirements due to changes in income or employment due to the pandemic.

In response to HUD’s new authority granted from the recent enactment of the CARES Act, HUD’s Office of Public and Indian Housing (PIH) issued its first of four CARES Act Waivers notices on April 10, 2020, directing PHAs “to utilize any and all waivers and alternative requirements as necessary to keep Public Housing and HCV programs operational to the extent practicable…and to expand housing assistance opportunities, including to families on waiting lists…”[[1]](#footnote-3) The notices offered PHAs an extensive list of over 80 waivers that included regulatory and statutory flexibilities for housing inspections, income requirements, wait lists, and other administrative requirements. The notice also allowed PHAs to immediately implement any of the select waivers at their own discretion, without the standard HUD review and approval process that is typically required when PHAs request regulatory waivers.[[2]](#footnote-4) PHAs were not required to implement waivers, and most waivers offered as part of the CARES Act expired by December 31, 2021.

**Overview of Study and Data Collection Request**

The Evaluation of PHA CARES Act Waivers is a mixed-methods and multi-phase study to understand how PHAs implemented CARES Act waivers during the pandemic as well as to gather and analyze feedback from PHAs on the utility of these waivers on their general operations and assisted households. The insights from PHAs will inform future policy and program implications related to the PHA waivers. 2M will conduct semi-structured interviews with PHA staff and stakeholders from a purposive sample of 50 PHAs. This includes three interviews of three stakeholders from 45 PHAs that adopted waivers offered by the CARES Act (a total of 135 interviews with 135 respondents), and one group interview with two stakeholders from five PHAs that did not adopt any waivers offered by the CARES Act (a total of 5 interviews with 10 respondents). 2M plans to conduct a total of 140 interviews across 145 respondents. This data collection effort is expected to last five months.

This study has four research objectives related to the implementation, outcomes, trends, and policy implications of the CARES Act waivers offered to PHAs. For the *implementation component*, the study will examine how the waivers were authorized and the process for utilizing the waivers across PHAs and assisted households. For *outcomes*, the study will bring a better understanding of the successes, challenges, and changes resulting from these waivers. For *trends and characteristics*, the study will identify the types of waivers that were utilized (or not utilized) by PHAs and describe the general activities and functions of these PHAs. For the *future policy and program implications*, the study will explore how the discontinuance of waivers offered by the CARES Act may impact PHAs and assisted households, as well as options for HUD to continue or provide similar flexibilities that were offered by the CARES Act.

The study will begin with a review of existing HUD documents, reports, and related articles to inform PHA data collection instruments as well as provide 2M with more background information on the authorization and implementation of waivers. In addition, the study will also review the online CARES Act Waiver Report Tool (CAWRT) which PHAs were requested to complete in December 2021. The CAWRT data will provide the study team with information on the trends and characteristics about how PHAs chose to implement (or not to implement) the waivers. In addition to the findings from the Document Review, 2M will utilize the CAWRT survey data to determine the types of waivers adopted by the PHAs as well as quantify the utilization of each type of waiver along related categories such as PHA size, region, program type, and Moving to Work (MTW) status. The CAWRT data will also help 2M to select a purposive sample of 50 PHAs.

In the next phase of the study, we will conduct semi-structured interviews with PHA leadership, PHA staff, and members of Resident Advisory Board from a sample of PHA sites that adopted waivers to understand the successes, challenges, and changes resulting from these waivers. We will also conduct semi-structured interviews with PHA leadership and staff and members of Resident Advisory Board from a sample of PHAs that did not adopt any waivers to understand their reasons for taking this course of action.

2M will also explore other relevant sources of HUD’s administrative data to provide additional insights into how the waivers offered by the CARES Act impacted PHA operations.

This submission requests OMB approval for the following data collection activities:

1. **Semi-structured interviews**
	1. Interviews with leadership at PHAs that adopted waivers (see protocol in Appendix A)
	2. Interviews with operations staff at PHAs that adopted waivers (see protocol in Appendix B)
	3. Interviews with members of the resident advisory board at PHAs that adopted waivers (see protocol in Appendix C)
	4. Interviews with leadership and operations staff at PHAs that declined to adopt waivers (see protocol in Appendix D)
2. **Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, please indicate the actual use the agency has made of the information received from the current collection.**

This is a new data collection. HUD will use the information collected to learn about the implementation, outcomes, trends, and policy implications of the 2020 CARES Act waivers offered to PHAs. 2M Research, the evaluation contractor, will carry out the data collection efforts and analysis on HUD’s behalf.

**Description of Data Collection Activities**

2M plans to conduct interviews with stakeholders from 50 PHAs, this includes 45 PHAs that adopted waivers and with 5 PHAs that did not adopt any waivers. We envision the first interview to involve someone in a leadership position from selected PHAs. This point of contact will also help to recruit other relevant stakeholders from the PHAs such as PHA residents and tenants outreach staff, members of Resident Advisory Boards, or other stakeholders that were involved or impacted by the implementation of PHA waivers. We envision this data collection effort to last up to five months. Data collection is expected to occur after OMB clearance between September 2023 and February 2024. Each interview will be recorded and transcribed. Once the data collection phase is complete, the study team will then clean the transcriptions for use in a multistep coding process to conduct a rigorous qualitative analysis of the interview data. These efforts will ultimately allow us to address the research questions listed in Exhibit A.

Exhibit A | Study Design Mapping of Research Questions to Associated Research Activities

|  |  |  |  |
| --- | --- | --- | --- |
| **Research Questions (RQs)** | **Document Review** | **PHA Interviews** | **Quantitative Data** |
| **CAWRT Survey Data** | **HUD Administrative Data** |
| **Approach** | **Review of HUD/published reports and articles** | * **PHA selection**
* **Instrument development**
* **Data collection and analysis**
 | **Data extraction, cleaning, and analysis** | **Data extraction, cleaning,and analysis** |
| **Implementation** |
| RQ1. What pre-existing programs or initiatives led to or influenced the authorization and implementation of PHA waivers offered by the CARES Act? | **ü** | **ü** |  |  |
| RQ2. Prior to the CARES Act, what kind of waivers and flexibilities were available to PHAs? | **ü** | **ü** |  | **ü** |
| RQ3. What was the process for implementing and utilizing the waivers offered by the CARES Act? | **ü** | **ü** |  |  |
| RQ4. What HUD guidance and support were available for PHAs for implementing waivers offered by the CARES Act, and how were the guidance and support provided? | **ü** | **ü** |  |  |
| RQ5. How did the authorization of the CARES Act change how PHAs implemented waivers? | **ü** | **ü** |  |  |
| RQ6. How did PHAs and HUD track the implementation of waivers? | **ü** | **ü** |  |  |
| **Outcomes** |
| RQ7. Based on available evidence, how (if at all) did waivers authorized by the CARES Act benefit assisted households? |  | **ü** |  | **ü** |
| RQ8. Based on available evidence, how (if at all) did the waivers authorized by the CARES Act negatively affect assisted households?  |  | **ü** |  | **ü** |
| RQ9. How did waivers authorized by the CARES Act affect service delivery models and general PHA operations? |  | **ü** |  | **ü** |
| a. How did these waivers affect quality of services and operations? |  | **ü** |  | **ü** |
| b. How did these waivers affect PHA workload? |  | **ü** |  | **ü** |
| RQ10. How did waivers offered by the CARES Act change PHA reporting of administrative data? How did related changes (if any) affect program and performance monitoring? |  | **ü** |  | **ü** |
| RQ11. How did additional PHA funding offered by the CARES Act (such as increased operating subsidies for Public Housing and increased administrative fees for HCV) affect how PHA adopted or implemented waivers? |  | **ü** |  |  |
| RQ12. How did the expiration of waivers authorized by the CARES Act affect PHAs and assisted households?  |  | **ü** |  |  |
| RQ13. How did the removal of HUD’s review and approval process for waivers authorized by the CARES Act affect PHAs? What were the related challenges and benefits? |  | **ü** |  |  |
| RQ14. How did HUD efforts to continue some of the flexibilities offered by the CARES Act (e.g., the expedited regulatory waivers) affect PHAs and assisted households? |  | **ü** |  |  |
| **Trends and Characteristics** |
| RQ15. Which waivers offered by the CARES Act were the least and most adopted and why did PHAs tend to utilize some of these waivers more than others? |  | **ü** | **ü** |  |
| RQ16. What are the characteristics of PHAs that utilized waivers offered by the CARES Act and those that did not utilize these waivers? |   |   | **ü** |  |
| RQ17. How did MTW PHAs utilize waivers compared to non-MTW PHAs? |   |  | **ü** |  |
| RQ18. Why did some PHAs decline the utilization of all waivers offered by the CARES Act, and what were the characteristics of these PHAs? |   | **ü** | **ü** |  |
| **Policy and Program Implications** |
| RQ19. Which waivers would PHAs like to consider continuing through regulatory and statutory changes? |  | **ü** |  |  |
| RQ19.a. What are the reasons for wanting to continue waivers? How would continuing the waivers benefit PHA operations or assisted households? How would discontinuing the waivers harm PHA operations or assisted households? |  | **ü** |  |  |
| RQ19.b. What modifications (if any) would PHAs want to make to the waivers offered by the CARES Act if continued? |  | **ü** |  |  |
| RQ19.c Are there any waivers PHAs would want discontinued through regulatory and statutory changes? If so, which ones and why? |  | **ü** |  |  |
| RQ20. How can HUD improve PHA flexibilities (e.g., waivers offered by the CARES Act) that do not require new legislation or congressional authorization? |  | **ü** |  |  |
| RQ21. How can HUD improve regulatory waivers offered to PHAs? Are expedited regulatory waivers a good continuation or alternative to the waivers offered by the CARES Act? |  | **ü** |  |  |

**Exhibit B** details the sections of the Master Interview Guide.

**Exhibit B | Sections Comprising the Semi-Structured Master Interview Guide**

|  |  |
| --- | --- |
| 1.  | Respondent Background  |
| 2.  | Context affecting the implementation of PHA waivers offered by the CARES Act |
| 3.  | Process for the implementation of PHA waivers offered by the CARES Act  |
| 4.  | Perceived outcomes associated with the implementation of PHA waivers offered by the CARES Act on PHAs and assisted households |
| 5. | Challenges associated with the implementation of waivers offered by the CARES Act |
| 6. | Recommendations for improvement, expansion, and sustainability of PHA flexibilities |

**Justification for Data Collection Instruments**

Qualitative data from PHA interviews will be used to comprehensively examine, document, and understand how PHAs used the waivers to maintain operations and support residents and tenants throughout the pandemic. Additionally, 2M will examine the outcomes, trends, and characteristics of the PHA waivers and explore program implications after the expiration of these waivers. Findings from our interviews will offer implications for ongoing and future PHA waiver policies.

**Key Study Deliverables**

The evaluation will result in the development of a Document Review Memo and a Final Comprehensive Report.

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 to adopt this means of collection. Please also describe any consideration for using information technology to reduce respondent burden.**

2M will conduct interviews remotely via a secure videoconference platform (e.g., Microsoft Teams) or over the telephone. Use of laptops will allow interviewers to quickly record data and continue with the interview without extended pauses or delays for note-taking purposes (and will also ensure a back-up record of responses). The interviewers will request permission from respondents before recording the interview. All recorded interviews will be transcribed for accuracy. This recording and transcription will be stored on SharePoint and will only be available to the study team. We will upload the transcription to NVivo, a qualitative data analysis software, for coding and analysis using a multistage process.

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 above in Item 2.**

HUD is currently unaware of any other studies for which this study represents a duplicate research effort. The study team will undertake a careful process to review all existing HUD and available research documents to ensure that the current ICR is not a duplication of effort.

Before conducting interviews with stakeholders, the study team will try to reduce respondent burden by reviewing all available information for each PHA, which will mainly include the review of CAWRT survey data and HUD program documents. The team will then tailor the interview guides with information collected through the online CAWRT surveys and a review of HUD documents to minimize the respondent burden on stakeholders.

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

This data collection does not affect small businesses. Some of the PHAs in the study may qualify as small entities depending on the size of their jurisdictions. The methods used to reduce respondent burden for all PHAs would also apply to these PHAs.

1. **Describe the consequence(s) 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.**

Without this data collection effort, HUD will be unable to evaluate the implementation and impact of CARES Act waivers on PHA operations and assisted households. The data collection covered by this information collection request (ICR) is essential for addressing the study’s research questions regarding PHA CARES Act waiver implementation, impact on PHA operations and assisted households, and for providing context for interpreting any administrative data analysis. If this data collection is not conducted, HUD would be unable to adequately answer the study’s key research questions or improve the provision of similar waivers or flexibilities to PHAs in the future.

1. **Explain any special circumstances that would cause an information collection effort to be conducted in any of the following ways:**

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 conditions 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 the request – “**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**”
* requiring a request 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**”
* requiring a request that includes a pledge of confidentiality that is not supported by authority established in statute or regulation (and 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**”
* requiring respondents to submit proprietary trade secrets or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information’s confidentiality to the fullest extent permitted by law – “**Not Applicable**”
1. **If applicable, please provide a copy and identify the date and page number of publication in the Federal Register of the agency’s notice as 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 on 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 three years (even if the collection of information activity is the same as in prior periods). There may be circumstances that may 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 Evaluation of PHA CARES Act Waivers. HUD published a 60-Day Notice of Proposed Information Collection in the Federal Register on April 3, 2023, (Docket No. FR-7075-N-02, pages: 19661-19663). The notice provided a 60-day period for public comments. Comments are due June 2, 2023.

The evaluation was developed and is being implemented by 2M Research, HUD’s contractor, and subcontractor, the National Association of Housing and Redevelopment Officials (NAHRO). Key members of the 2M team include Principal Investigator Dr. Hiren Nisar; Project Manager Dr. Dennis Okyere; Qualitative Lead Dr. Emily Brimsek; and NAHRO Subject Matter Experts Eric Oberdorfer and Tushar Gurjal. Staff from HUD’s Office of Policy Development and Research (PD&R) and Office of Public and Indian Housing (PIH) have collaborated with the 2M study team on the study design and data collection plan.

The study’s data collection period is five months. Throughout the data collection period, the 2M team will submit Monthly Data Collection Disposition Reports to keep HUD apprised of data collection activities.

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

There will be no payments or gifts to respondents.

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

HUD has entered a contract with an independent research team, 2M Research, to conduct this research effort. HUD and 2M Research will make every effort to maintain the privacy of respondents to the fullest 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. All respondents included in the study will be informed that their participation in the data collection is voluntary and that the information they provide will be used for research purposes only.

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 any questions of a sensitive or private nature.

1. **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 than10) 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 for approval 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.**
* **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.**

2M will conduct interviews with stakeholders from the 50 selected PHAs, a total of 140 interviews across 145 respondents. We envision the first interview to involve someone in a leadership position from selected PHAs. This point of contact will also help to recruit other relevant stakeholders from the PHAs such as PHA staff (either outreach staff or other staff that were involved in the implementation of PHA waivers) and members from Resident Advisory Boards. These interviews will take approximately one hour to complete. The hour burden is detailed in **Exhibit C**.

**Exhibit C | Annualized Burden Table**

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| --- |
| **Annualized Burden Table[[3]](#footnote-5)** |
| **Information Collection** | **Number of Respondents** | **Frequency of Response** | **Responses Per Annum** | **Burden Hour Per Response** | **Annual Burden Hours** | **Hourly Cost Per Response** | **Cost** |
| **PHAs that Adopted a Waiver** |
| Interview of PHA Leadership | 45 | 1 | 45 | 1.0 | 45.0 | $77.58 | $3,491.10 |
| Interview of PHA Operations Staff | 45 | 1 | 45 | 1.0 | 45.0 | $29.89 | $1,345.05 |
| Interview of Members of Residents Advisory Board | 45 | 1 | 45 | 1.0 | 45.0 | $59.78 | $2,690.10 |
| **PHAs that did not Adopted a Waiver** |
| Interview of PHA Leadership and Staff (combined) | 10 | 1 | 10 | 1.0 | 10.0 | $53.74[[4]](#footnote-6) | $537.40 |
| **Total**  | **145** |  |  |  | **145.0** |  | **$8,063.65** |

The total estimated annual cost for this information collection is $8,063.65. The total estimated annual cost is the total number of respondent hours per type multiplied by the hourly cost per respondent. To estimate the hourly cost per respondent, 2M used the average hourly compensation (wages and benefits) for private workers in Service-Providing Industry according to the U.S. Bureau of Labor Statistics’ Employer Costs for Employee Compensation Survey from June 2022 (<https://www.bls.gov/news.release/pdf/ecec.pdf>).

There is a maximum of 145 respondents, an estimated annualized hour burden of 145 hours, and an average annualized cost of $8,063.65.

1. **Provide an estimate for 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 and 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 collections 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.

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

The current effort is being carried out under a HUD Contract with 2M Research. HUD estimates the costs to the Federal government for these data collection and analysis efforts to be approximately $499,981 for two years in professional services.[[5]](#footnote-7) The professional labor cost estimates for this information collection include project management staff, survey methodologists, interviewers, IT support staff, and data analysis and reporting staff. **Exhibit D** summarizes the cost breakdown.

**Exhibit D | Estimated Cost Breakdown**

|  |  |  |
| --- | --- | --- |
| **Activity** | **Estimated Cost to Federal Government** | **Total Labor Hours For Information Collection** |
| Professional Labor | $ 499,981.00 | 3,476 hours |

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

This submission to OMB is an initial submission and does not involve any program changes or adjustments.

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

The data collected for the study will be analyzed, tabulated, and reported to HUD by 2M Research. **Exhibit E** presents an overview of the time schedule for the entire project. This schedule assumes that data collection begins after OMB clearance in September 2023.

**Exhibit E | Project Schedule/Timeline**

| **Task/Del Num** | **Deliverable** | **Due Date** | **HUD Response** |
| --- | --- | --- | --- |
|  | *Contract Start Date* | 30-Sep-22 |   |
| 1/A001 | *Draft slide deck for Opening Meeting* | 7-Oct-22 | 3 days |
| 1/A002 | *Final slide deck for Opening Meeting* | 14-Oct-22 | NA |
| 1/A003 | *Draft Management and Work Plan* | 28-Oct-22 | 2 weeks |
| 1/A004 | *Final Management and Work Plan* | 21-Nov-22 | 2 weeks |
| 1/A005 | *Monthly Progress Reports (MPR)* | By 25th of every month | 3 days |
| 2/A006 | *Draft Research Design, Data Collection, and Analysis Plan* | 12-Dec-22 | 2 weeks |
| 2/A007 | *Final Research Design, Data Collection and Analysis Plan* | 2-Jan-23 | 2 weeks |
| 3/A008 | *Draft OMB Clearance Package* | 9-Jan 23 | 2 weeks |
| 3/A009 | *Final OMB Clearance Package* | 30-Jan-23 | 2 weeks |
| 4/A010 | *Document Review Memo* | 1-Aug-23 | 2 weeks |
| 5/A011 | *Monthly Data Collection Disposition Reports* | By 15th of every month  | 3 days |
| 5/A012 | *Data Extract Memo* | 31-Mar-23 | 2 weeks |
| 6/A013 | *Final Comprehensive Report Outline* | 29-Sept-23 | 2 weeks |
| 6/A014 | *Draft Final Comprehensive Report* | 14-June-24 | 2 weeks |
| 6/A015 | *Revised Final Comprehensive Report* | 12-July-24 | 2 weeks |
| 7/A016 | *Briefing on the Final Comprehensive Report* | July 2024 | 2 weeks |
| 8/A017 | *Data Files and Accompanying Data Documentation* | 19-July-24 | 2 weeks |

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

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

1. **Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.**

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

1. HUD PIH CARES Act Waiver notices: [PIH 2020-05](https://www.hud.gov/sites/dfiles/OCHCO/documents/2020-05pihn.pdf), [PIH 2020-13,](https://www.hud.gov/sites/dfiles/OCHCO/documents/2020-13pihn.pdf) [PIH 2020-33](https://www.hud.gov/sites/dfiles/PIH/documents/PIH2020-33.pdf), and [PIH 2021-14.](https://www.hud.gov/sites/dfiles/PIH/documents/PIH2021-14.pdf) [↑](#footnote-ref-3)
2. Per 24 CFR 5.110, HUD is authorized to grant *regulatory* waivers to PHAs at any time (including before and after the authorization of the CARES Act). HUD cannot grant *statutory* waivers to PHAs, unless authorized by Congress (such as the authorization given to HUD as part of the CARES Act). [↑](#footnote-ref-4)
3. To estimate the hourly cost per respondent, the research team used the average hourly compensation (wages and benefits) for private workers in Service-Providing Industry according to Table 4 on page 8 in the Bureau of Labor Statistics’ Employer Costs for Employee Compensation Survey from September 2022 (<https://www.bls.gov/news.release/pdf/ecec.pdf>). The hourly cost for PHA leadership was assumed to be those who are in Management, business, and financial occupations. The hourly cost for PHA staff was assumed to be those in Office and administrative support occupations. The hourly cost for members of Resident Advisory Boards was assumed to be those in Professional and related occupations. [↑](#footnote-ref-5)
4. The average hourly cost per response for the combined interviews of PHA Leadership and Staff was calculated as the average for the hourly rate for PHA Leadership ($77.58) and PHA Staff ($29.89) [($77.58+$29.89)/2]. [↑](#footnote-ref-6)
5. This covers all the tasks for the entire project, including developing, administering, and analysis of interview data. [↑](#footnote-ref-7)