

**Evaluation of the Eviction Protection Grant Program
Part A Supporting Statement for Paperwork Reduction Act Submission**

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 the Eviction Protection Grant Program. The overall purpose of the Eviction Protection Grant Program is to support experienced legal service providers, not limited to legal service corporations, in providing legal assistance at no cost to low-income tenants at risk of or subject to eviction. In 2021, HUD selected 10 grantees for the first round of awards, and in FY 2022, HUD selected 11 additional grantees for the second round of awards. HUD's evaluation of the Eviction Protection Grant Program will include data collection from the first two rounds of 21 grantees and 21 subrecipients that are helping to administer the program, as well as program participants.

The Eviction Protection Grant Program was established to achieve the following four program objectives:

1. Distribute federal financial support to nonprofit and government entities to provide legal assistance at no cost to low-income renters facing eviction or at risk of eviction in areas with high rates of evictions or risk of evictions.
2. Provide eviction protection services to historically underserved populations, including people of color, persons with limited English proficiency, and persons with disabilities.
3. Ensure a proportionate distribution of funding amounts for rural areas, including Tribal lands.
4. Build the evidence base for the activities most effective at preventing evictions or mitigating negative consequences that result from evictions.

Funding for HUD's FY 2021 Eviction Protection Grant Program is provided by the Consolidated Appropriations Act, 2021, Division L, Title II - HUD Appropriations Act, 2021, provision on legal services regarding evictions (Pub. L. No. 116-260, approved December 27, 2020).

In addition, grantees are required to participate in research with HUD's Office of Policy Development and Research (PD&R). The notice of funding opportunity (NOFO) stated that "participation in HUD-Sponsored Program Evaluation" applies as one of the Administrative, National and Department Policy Requirements and Terms for HUD Financial Assistance Award (see page 35 of **Appendix A**). Similarly, Section 11.2 of the Program Requirements in the Grant Terms and Conditions states that "the Grantee shall cooperate fully with any research or evaluation sponsored by HUD or another government agency associated with this grant program, including preservation of project data and records and compiling requested information in formats provided by the researchers, evaluators, or HUD" (see page 17 of **Appendix B**).

Overview of Evaluation and Data Collection Request

HUD has contracted with 2M Research for the evaluation of the Eviction Protection Grant Program. A copy of the relevant section of law authorizing the Department to undertake “such programs of research, studies, testing, and demonstration relating to the mission and programs of the Department” (12 USC 1701z-1 et seq.) is included as **Appendix C**.

The evaluation of the Eviction Protection Grant Program will be conducted using a mixed-methods and multi-phase approach designed to understand how grantees implemented this new program and to assess the effectiveness of the grant program in supporting low-income families at risk of or facing eviction through the provision of legal assistance at no-cost to eligible households. The evaluation is comprised of an implementation analysis utilizing qualitative and quantitative data to understand how the Eviction Protection Grant Program reduces or prevents eviction among program participants. The evaluation will comprehensively document the implementation of the Eviction Protection Grant Program, including a review and collection of data to understand successes and challenges to program implementation, the characteristics of grantees and other stakeholders, the types of client services provided, how grantees work with other social service providers, and program outcomes.

Over the course of the evaluation, HUD plans to conduct two rounds of primary data collection, which is the subject of this information collection request. The first round of primary data collection will take place early in the grant period and be focused on assessing program rollout, program take-up, and program implementation. The second round of primary data collection will take place later in the grant period and will focus on the overall experience of grantees, subrecipients, and program participants with the Eviction Protection Grant Program. Each round of data collection will include semi-structured interviews with staff from each of the 21 grantees and 21 subrecipients, as well as data collection from program participants to understand their perspectives on the program. HUD intends to conduct focus groups with program participants, but if that is not feasible, HUD will conduct individual online interviews with a small number of program participants.

In the first round of data collection, HUD plans to conduct a total of 42 semi-structured interviews, one with each of the grantees and one with each selected subrecipient. These interviews will include approximately 126 grantee and subrecipient staff (an average of three staff per interview). In the second round of data collection, HUD again plans to conduct 42 semi-structured interviews, one with each of the grantees and one with each selected subrecipient. This round of interviews will also include approximately 126 grantee and subrecipient staff (an average of three staff per interview). Across both rounds of data collection, HUD will attempt to facilitate a total of 21 focus groups with participants, one focus group for each of the 21 grant programs. Each focus group will include no more than 5 participants each, for a total of 105 program participants. As mentioned above, HUD acknowledges that it may be difficult to implement focus groups at every grantee site and has identified individual online interviews as an alternate approach to capture participant experiences with the program if focus groups are infeasible. HUD expects to conduct interviews with approximately 42 program participants.

In total, over the course of both rounds of data collection, HUD plans to conduct 84 grantee and subrecipient interviews, 21 focus groups with 105 program participants, and 42 online interviews with program participants.

Exhibit A | Summary of Qualitative Data Collection

Stakeholder Role	Number of Semi-Structured Interviews	Number of Focus Groups
Round 1 of Primary Data Collection		
Grantees/Subrecipients	42	
Program Participants	20	10
Round 2 of Primary Data Collection		
Grantees/Subrecipients	42	
Program Participants	22	11

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

- 1) Round 1 interviews with grantees and subrecipients (see protocol in **Appendix G.1**)
- 2) Round 2 interviews with grantees and subrecipients (see protocol in **Appendix G.2**)
- 3) Focus groups with program participants (see protocol in **Appendix G.3**)
- 4) Interviews with program participants (see protocol in **Appendix G.4**)

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.

This is a new data collection. HUD will use the information collected to understand successes and challenges to program implementation, the characteristics of grantees and other stakeholders, the types of client services provided, how grantees work with other social service providers, and program outcomes. HUD anticipates that the information will be synthesized in the interim and final reports, which may be published and made publicly available. HUD intends to use the information to understand program implementation, highlight best practices, and develop policy or programmatic recommendations, which may be implemented in future iterations of this program or similar programs. 2M Research, the evaluation contractor, will carry out the data collection, data analysis, and report writing on HUD’s behalf.

Grantee interviews: Qualitative data from grantee staff interviews will be synthesized in the interim and final reports and will be used to describe how the grant program was intended to be implemented, how it was actually implemented, grantees’ perception of the extent to which the program is achieving the desired outcomes, implementation successes and challenges, suggested improvements to the program design and delivery, characteristics of participants served, program outreach, and service provision.

Subrecipient interviews: Qualitative data from subrecipient staff interviews will be synthesized in the interim and final reports and will be used in the same manner as data from grantee

interviews.

Program participant focus groups: Qualitative data from the program participant focus groups will be included in the interim and final reports and will be used to capture important insights regarding the program participants' experiences with the program, their perspectives on the services offered, and the usefulness of the program.

Program participant interviews: Qualitative data from the program participant interviews will also be captured in the interim and final reports and will be used in the same manner as data from the program participant focus groups.

Below are details on the recruitment strategy for program participants.

Recruitment of Program Participants: 2M plans to collect information from five program participants per grantee. 2M will provide grantees with electronic materials advertising the opportunity for interested program participants to contact 2M directly to participate in the focus group on a voluntary basis (see Recruitment Flyer included in **Appendix D**). 2M will emphasize the \$50 gift card incentive for participation. Additionally, 2M will provide the grantee point of contact with informed consent forms to be administered to interested program participants. If signed by the program participant, the informed consent form would allow the grantee to share the program participant's contact information with 2M so that 2M can recruit them for focus groups. The informed consent for sharing participant information is included in **Appendix E**.

To ensure that recruitment reaches people with disabilities and those with limited English proficiency, 2M will make reasonable efforts to distribute materials in languages specified by grantees as significant among their beneficiary population. HUD's Office of Policy Development and Research has a translation services contract that may be used to translate written materials into other languages. 2M will ensure that all written materials distributed to participants meet accessibility requirements covered by Section 508 of the Rehabilitation Act and include information about the right to request reasonable accommodation and the process for doing so. 2M encourages prospective participants who require reasonable accommodations to contact the research team.

If 2M is unable to recruit at least two participants for a grantee, 2M will seek assistance from grantee or subrecipient staff to identify and provide contact information for alternate participants to the extent that the grantee or subrecipient has the organizational capacity to support this recruitment effort. Additionally, once the prospective participants have been identified and contacted, 2M will collaborate with pertinent staff to find alternate respondents if participants are unresponsive or unavailable (during the data collection period) and conduct additional outreach efforts for participant self-selection.

If interested program participants express hesitancy in participating in a focus group, 2M will provide them with alternate options like one-on-one interviewing without being recorded while emphasizing confidentiality (e.g., interviews will be anonymous, and names will not be shared in reports). If the number of program participants for any grantee is less than three, 2M will

schedule a 45-minute one-on-one interview with the two individual participants (instead of the focus group).

The focus group protocol and one-on-one interview guide will remain the same for both rounds.

2M will utilize Microsoft Teams to conduct focus groups and one-on-one interviews virtually and will provide the participants with a call-in phone number if they do not have access to a computer.

- **Protocol for Focus Group Recruitment:** 2M will conduct outreach to all program participants who contact 2M directly or for whom 2M receives contact information from the grantee, and will make reasonable efforts to use a means and language of communication most appropriate for the selected participant depending on language proficiency and disability status. 2M is capable of conducting Spanish-language interviews and focus groups. Respondents will be provided with up to five possible times and dates for the focus group, after which they will be asked to select all possible 90-minute slots for which they are available to participate. 2M will provide additional time slots if the initial five slots do not work for at least three participants. The focus groups will be scheduled according to respondent availability. Informed consent will be administered at the outset of the focus group, with verbal consent requested from each respondent and maintained as part of the session recording. Respondents will also be provided with an informed consent statement (see informed consent for participation in **Appendix F**) prior to attending the interview via email or other accessible means of delivery. For those who do not provide us with their email address, 2M will read the informed consent during the interview and record their response.
- **Protocol for One-on-one Interview Recruitment:** 2M anticipates focus groups will include five participants. If fewer than three program participants from a given grantee/subrecipient are interested in participating in a focus group, 2M will instead conduct a 45-minute individual interview with those program participants who are interested in participating. Informed consent (see informed consent for participation in **Appendix F**) to participate will be administered at the outset of the interview, with verbal consent requested from the individual respondent and maintained as part of the interview recording. Respondents will also be provided with an informed consent statement prior to attending the interview via email or other accessible means of delivery. For those who do not provide us with their email address, 2M will read the informed consent during the interview and record their response.

2M plans to conduct two rounds of data collection and envisions that this effort will last up to two months for each round.

- Round 1 of data collection is expected to occur between October and November 2023.
- Round 2 of data collection is expected to occur between March and April 2024.

Once the data collection phase is complete, 2M will then clean the transcriptions for use in a multistep coding process to conduct a rigorous qualitative analysis of the interview data. The data analysis will be summarized in and publicly disseminated through the interim and final reports.

- 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.**

2M is not planning to administer any electronic data collection. Interviews and focus groups will be conducted remotely via a secure videoconference platform (e.g., Microsoft Teams) or over the telephone as requested by the participant to reduce burden. If any language interpretation services are available, including ASL services, the availability of such services will be communicated to all potential participants during outreach and again during the informed consent process. 2M will review all available data prior to starting data collection to ensure that the interviews conducted are focused and nonduplicative to already available information. The use of recording during interviews and focus groups, with the respondent's permission, will further reduce the need to follow-up with and burden the respondent.

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

The Eviction Protection Grant Program is a new HUD program, and there have not been studies on or evaluations of this program to date.

Before conducting interviews with grantee and subrecipient staff, 2M will review all available information for each grantee and subrecipient through the documents and spreadsheets submitted by the grantees to reduce respondent burden. 2M will pre-populate the interview guides with information collected through a review of these documents to minimize the respondent burden on program staff.

- 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.**

This data collection will not have a significant economic impact on a substantial number of small entities. Methods used to minimize burden will apply to all respondents.

- 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.**

Without this data collection effort, HUD will be unable to evaluate the implementation of the Eviction Protection Grant Program and understand the program's role in helping low-income individuals and families avoid eviction or minimize the damage caused by eviction. This is a critical policy question for HUD, as outlined in HUD's Learning Agenda FY 2022–2026. The data collection covered by this information collection request (ICR) is essential for answering the research questions regarding Eviction Protection Grant Program implementation and providing context to interpreting any administrative data analysis.

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 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”**

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 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 3 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 12, 2023 (FR-7075-N-03, pages 22063-22064). The notice provided a 60-day period for public comments. Comments are due June 12, 2023.

The evaluation was developed and is being implemented by 2M Research under contract to HUD. Key members of the 2M team include Principal Investigator Dr. Hiren Nisar; Quantitative Lead Dr. Arpita Chakravorty; and Qualitative Lead Dr. Emily Brimsek. The 2M staff are supported by two subject matter experts, Carl Gershenson from Eviction Lab at the Princeton University and Mark Melton from the Dallas Eviction Advocacy Center.

Staff from HUD's Office of Policy Development and Research (PD&R) have collaborated with 2M on the study design and data collection plan. In addition, the study design includes the establishment of an Expert Panel to provide guidance to 2M at key points throughout the research effort. Members of the Expert Panel include experts in the field of eviction prevention, attorneys with experience in providing legal services to individuals facing eviction, and persons with lived experience. The Expert Panel has provided input into the study design, data collection plan, and data collection instruments.

Additionally, 2M will submit the data collection materials to an IRB for approval. Of particular note, the data collection instruments for program participants will be sent for review and approval prior to use.

The study's data collection period is 2 months for each round. Throughout the data collection period, 2M will submit Monthly Data Collection Disposition Reports to keep HUD apprised of data collection activities.

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

Program participants who take part in focus groups or interviews will receive remuneration for their time in the form of an incentive payment in the form of a \$50 gift card.

10. 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.

All 2M 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.

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 data collection instruments do not contain any questions that collect personally identifying information. 2M may ask program participants to discuss their eviction-related experiences, which could be considered of a sensitive or private nature. However, 2M plans to remind the program participants that none of the questions are mandatory, participants may skip any questions that they do not want to answer, and participants may stop their participation at any time. 2M is currently working with an IRB to approve the final data collection materials for program participants to ensure that any questions that are deemed to be necessary and sensitive are presented in an appropriate manner.

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 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 83-1.**
- **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.**

Each round of data collection will include semi-structured interviews with staff from each of the 21 grantees and 21 subrecipients, as well as data collection from program participants to understand their perspectives on the program. HUD intends to conduct focus groups with program participants, but if that is not feasible, HUD will conduct individual online interviews with a small number of program participants.

In the first round of data collection, HUD plans to conduct 42 semi-structured interviews, which will include 126 grantee and subrecipient staff (an average of three staff per interview). In the second round of data collection, HUD again plans to conduct 42 semi-structured interviews, which will include 126 grantee and subrecipient staff (an average of three staff per interview). Across both rounds of data collection, HUD will facilitate 21 focus groups with 105 program

participants (5 program participants per focus group), and individual online interviews with 42 program participants. Hour burdens are detailed in **Exhibit B**.

Respondents (i.e. affected public): Staff from the 21 grantees of HUD’s Eviction Protection Grant Program, staff from the 21 grant subrecipients, and a sample of program participants.

Estimated Number of Respondents: 273 unique respondents (126 grantee and subrecipient staff, and 147 program participants).

Frequency of Response: Once for grantee and subrecipient staff in the first round of data collection; once for grantee and subrecipient staff in the second round; once for program participants.

Average Hours per Response: Semi-structured interviews with grantee and subrecipient staff are expected to last an average of 1 hour in the first round of data collection. Semi-structured interviews with grantee and subrecipient staff are expected to last an average of 1 hour in the second round of data collection. Focus groups with program participants are expected to last 90 minutes. Individual online interviews with program participants are expected to last 45 minutes. Informed consent for the program participants to provide contact information is expected to take 10 minutes. Informed consent for the program participants to participate in the study is expected to take 5 minutes.

Total Estimated Burdens: 477.75 hours

Exhibit B | Annualized Burden Table

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Cost
Round 1: Interview with Grantee/Subrecipient Staff	126	1	126	1	126	\$77.42	\$9,754.92
Round 2: Interview with Grantee/Subrecipient Staff	126	1	126	1	126	\$77.42	\$9,754.92
Focus Group with Program Participants	105	1	105	1.5	157.5	\$41.86	\$6,592.95
Interview with Program Participants	42	1	42	0.75	31.5	\$41.86	\$1,318.59
Informed Consent to Provide Contact Information	147	1	147	0.17	24.99	\$41.86	\$1,025.57
Informed Consent to Participate in the Study	147	1	147	0.08	11.76	\$41.86	\$512.79
Total					477.75		\$28,959.74

The total estimated annual cost for this information collection is \$28,959.74. The total estimated annual cost is the total annual burden hours multiplied by the hourly cost per respondent. To estimate the hourly cost per respondent, 2M used the average hourly compensation (wages and benefits) of civilian workers for program participants and of private workers who are in management, business, and financial occupations for Grantee and Subrecipient Staff, according to the U.S. Bureau of Labor Statistics’ Employer Costs for Employee Compensation Survey from September 2022 (<https://www.bls.gov/news.release/pdf/ecec.pdf>).

There is a maximum of 273 respondents, an estimated annualized hour burden of 477.75 hours, and an average annualized cost of \$28,959.74.

13. Provide an estimate for the total annual cost burden to respondents or record keepers 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.

14. 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.

HUD estimates the costs of this data collection to the Federal government to be approximately \$551,567 for the two rounds of data collection and analysis in professional services.¹ The

¹ This covers all the qualitative data collection and analysis tasks for the entire project, including developing, administering, and analysis of interviews and focus groups. It also includes the incentives for the program

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 C** summarizes the cost breakdown.

Exhibit C | Estimated Cost Breakdown

Activity	Estimated Cost to Federal Government	Total Labor Hours For Information Collection
Data Collection	\$ 335,841.00	2,218 hours
Data Analysis	\$ 208,376.00	1,371 hours
Incentives	\$ 7,350.00	-
TOTAL	\$ 551,567.00	3,589 hours

15. 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.

16. 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 in the interim and final briefings and the interim and final reports. The interim and final reports are expected to be published. **Exhibit D** presents an overview of the project schedule for these deliverables.

Exhibit D | Estimated Schedule

Deliverable	Due Date
Data collection	Round 1: Oct-Nov 23 Round 2: March-April 24
BRIEFINGS	
Draft interim briefing materials	11-Dec-23
Interim briefing	3-Jan-24
Draft final briefing materials	16-Sep-24
Final briefing	14-Oct-24
REPORTS	
Draft interim report	4-Dec-23
Final interim report	2-Feb-24
Draft final report	9-Sep-24
Final report	9-Dec-24

participants.

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.

Not applicable. All data collection instruments will prominently display the expiration date for OMB approval.

18. Explain each exception to the certification statement identified in Item 19, “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).