

Supporting Statement for Paperwork Reduction Act Submissions
Study of Post-Disaster Outcomes of Renter Households and Rental Housing
U.S. Department of Housing and Urban Development
Community Development Block Grant-Disaster Recovery (CDBG-DR)
(OMB# 2528-NEW)

A. Justification

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

This research is conducted under the authority of the Secretary of the U.S. Department of Housing and Urban Development to undertake programs of research, studies, testing and demonstration related to HUD's mission and programs (12 USC 1701z-1 et seq.).

A growing body of research demonstrates how the increasing severity and frequency of disasters exacerbates existing challenges of housing affordability and stability, especially for renters in disaster-affected states, counties, and cities. While the federal government plays an increasingly central role in recovery, pathways for long-term recovery of renters and affordable rental housing are understudied, leaving policymakers with limited tools for long-term planning.

The Community Development Block Grant-Disaster Recovery (CDBG-DR) grants are one of the most prominent sources of federal funding for post disaster recovery, supplementing assistance programs administered by Federal Emergency Management Agency (FEMA), Small Business Administration (SBA) and other agencies. To date \$96 billion dollars have been allocated through CDBG-DR starting from Hurricanes Andrew and Omar in 1992 through Hurricane Ida and other events in 2021.¹ U.S. Department of Housing and Urban Development (HUD) CDBG-DR funding is appropriated by Congress following major Presidentially declared disasters when Congress deemed other aid and resources were not enough to meet the needs of the impacted community. State or local CDBG-DR grantees develop action plans and aligned budgets to address unmet need in their communities. According to HUD, "housing assistance is typically the most immediate priority of state and local governments and is often the largest budgeted activity. The intent of housing recovery programs is to ensure those whose homes were impacted by the disaster can return to safe and adequate housing or relocate to suitable housing elsewhere."²

To address the gap in understanding recovery outcomes for rental housing and assessing CDBG-DR effectiveness for this population, in summer 2022, HUD issued a NOFO (FR-6600-N-29A) to announce availability of funding for two research projects. The joint goal of the research is to "improve disaster recovery effectiveness for renter households by examining the disaster recovery outcomes of renter households and rental housing stock in places that

¹ CDBG-DR Grant History Report, January 1 2023.

² HUDRD CDBG Disaster Recovery Outcomes of Renter Households NOFO (FR-6600-N-29A) page 7.

received Community Development Block Grant-Disaster Recovery grants (CDBG-DR).”³ Funding for these studies came from the Consolidated Appropriations Act, 2021 (Public Law 116-260, approved December 27, 2020) which provided funding to HUD for research on disaster recovery to support the Department to evaluate the efficacy of its disaster recovery programs. This is aligned with HUD’s FY 2022-2026 Strategic Plan for ensuring everyone has an affordable, healthy place to live.

The scope of the research will focus on the disaster recovery outcomes of renter households and rental housing stock in places awarded CDBG-DR grants, the contributing factors and mechanisms driving recovery outcomes for renter households, and opportunities to improve upon them. The findings of the research will provide recommendations to support Congress, HUD, and State and Local governments in mitigating the loss of affordable rental housing following disasters and facilitating faster and better recovery of renter households.

Urban Institute was awarded a cooperative agreement to pursue one of the research studies made available through the NOFO. Research questions identified by HUD in the RFQ—and the corresponding data collection strategy proposed by The Urban Institute—are provided in Table A1.

This supporting statement requests approval for qualitative research (interviews and focus groups) in three disaster affected communities to provide context and help identify potential additional variables of interest for local quantitative analysis of changes in rental housing changes in renter populations and understand the recovery initiatives and role of CDBG-DR requirements in influencing outcomes. The other data collection strategies are not subject to the Paperwork Reduction Act and are therefore not included as part of this request.

Table A1: RESEARCH QUESTIONS AND DATA COLLECTION STRATEGIES

Research Question	Data Collection Strategy
1. How do rental housing stock, market composition, and dynamics change over the short- and long-term in cities and regions impacted by disasters?	<ul style="list-style-type: none"> National landscape analysis and case study Case studies: local market analysis
2. What changes take place among renter populations in areas impacted by disasters, with regard to population demographics, rental housing cost burdens, financial distress, displacement from affected communities over the short and long-term?	<ul style="list-style-type: none"> National landscape analysis Case studies: local market analysis
3. What efforts have been implemented by Federal and state and local governments to mitigate loss of affordable rental housing stock post-disaster?	<ul style="list-style-type: none"> Case studies: qualitative research Case studies: analysis of CDBG-DR activities
4. How did the relevant requirements for CDBG-DR (affordable rental housing set aside, coordination of Action Plan with local PHAs, and time limits on affordability) help or hinder post-disaster efforts to address the rehabilitation, reconstruction, replacement, and new construction of rental housing affordable to low- and moderate-income households?	<ul style="list-style-type: none"> Case studies: qualitative research Case studies: analysis of CDBG-DR activities
5. What lessons learned can be extracted from the challenges and solutions grantees experienced?	<ul style="list-style-type: none"> Case studies: qualitative research Synthesis of findings

³ HUDRD CDBG Disaster Recovery Outcomes of Renter Households NOFO (FR-6600-N-29A)

--	--

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 research employs a multi-method strategy aimed at providing all of the information necessary to answer HUD’s research questions (Table A1) about the post-disaster rental recovery and the CDBG-DR program.

All of the data collection will be performed by Urban Institute. The qualitative research activities (subject of this ICR request) for this study site includes visits to three case study communities (to be determined) to conduct Interviews with those involved in the recovery process (grantees, city leaders, CDFIs, housing advocates, public housing authorities, local housing organizations, and tenant advocates) as well as focus groups with renters and landlords. All data collection instruments are included in Part C. Urban Institute staff will conduct the site visits as one-time data collection activities. The Urban Institute used the U.S. Department of Labor’s Bureau of Labor Statistics to categorize interview and focus group participants by relevant labor category: federal, state, and local government representatives; professionals and business services representatives; and private sector employees. Each data collection activity is described below in Table A2.

Upon completion, the study will make substantial contributions to the understanding of post-disaster rental housing recovery and the efficacy of the CDBG-DR program in order to improve disaster recovery effectiveness for renter households. Specifically, it will provide data and information about:

- Outcomes of renter households and changes in rental housing dynamics in areas impacted by disasters.
- How disaster recovery programs funded through CDBG-DR impacts renters.
- Lessons learned for future recovery efforts.

The Urban Institute is responsible for the collection and analysis of this information. Urban will report its findings to HUD’s Office of Policy Development and Research, which, in turn, will report this information to Congress, representatives of the affected communities, and the general public.

Table A2: INSTRUMENTS, RESPONDENTS, CONTENT, AND PURPOSE FOR INCLUSION

Instruments	Respondents, Content, Reason for Inclusion
Qualitative interviews with federal, state, and local government representatives Appendices B, I, J	Respondents: CDBG-DR administrators and HUD staff as well as elected and appointed government officials in identified study communities; estimated to be approximately 25. Content: <ul style="list-style-type: none"> • Housing markets • Renter populations • CDBG-DR implementation and management • Disaster risk perceptions

	<p>Reason: The interviews will elicit qualitative data about topics for which there is no available existing data source, including local changes in housing markets and renter populations following disasters; CDBG-DR activities, expenditures, and outcomes; impacts from CDBG-DR requirements; and perceptions of local future disaster risks.</p>
<p>Qualitative interviews with professionals and business services representatives</p> <p>Appendices C, I, J</p>	<p>Respondents: PHA staff and property owners and staff; estimated to be approximately 20.</p> <p>Content:</p> <ul style="list-style-type: none"> • Rental markets • Rental housing dynamics • Disaster impacts on rental markets <p>Reason: The interviews will elicit qualitative data about topics for which there is no available existing data source, including local rental and subsidized housing markets, rental housing costs and rental market dynamics, rental housing quality, access to resources, and changes in rental housing markets and renter populations following disasters.</p>
<p>Qualitative interviews with private sector employees</p> <p>Appendices C, D, E, F, I, J</p>	<p>Respondents: Representatives from CDFIs, private developers, private landlords, advocacy organizations, renters, and other private sector professionals; estimated to be approximately 25.</p> <p>Content:</p> <ul style="list-style-type: none"> • Housing planning and decision-making • Housing redevelopment • Disaster displacement • Housing experiences • Rental markets • Rental housing dynamics • Disaster impacts on rental markets <p>Reason: The interviews will elicit qualitative data about topics for which there is no available existing data source, including decision making; local outcomes of housing redevelopment; personal experiences with displacement, housing quality, cost burden, and financial distress; rental and subsidized housing markets; rental market dynamics; rental housing quality; access to resources; and changes in rental housing markets and renter populations following disasters.</p>
<p>Qualitative focus groups with private sector employees</p> <p>Appendices G, H, K, L, M, N</p>	<p>Respondents: Representatives from CDFIs, private developers, private landlords, advocacy organizations, renters, and other private sector professionals; estimated to be approximately 125.</p> <p>Content:</p> <ul style="list-style-type: none"> • Housing planning and decision-making • Housing redevelopment • Disaster displacement • Housing experiences • Rental markets • Rental housing dynamics • Disaster impacts on rental markets <p>Reason: The focus groups will elicit qualitative data about topics for which there is no available existing data source, including decision making; outcomes of housing redevelopment; personal experiences with displacement, housing quality, cost burden, and financial distress; rental and subsidized housing markets; rental market dynamics; rental housing quality; access to resources; and changes in rental housing markets and</p>

renter populations following disasters.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

Our information collections include in-person interviews and focus groups as part of site visits as well as potential virtual interviews with key informant respondents depending on their location and availability. These qualitative activities require direct person-to-person communication, and using technology would not allow the flexibility the project requires nor capture the depth of qualitative information needed to fully understand how the CDBG-DR program is administered and experienced.

For those that prefer or have scheduling limitations during in-person data collection, interviews may be conducted virtually using common videoconferencing services such as Zoom or Teams. In all cases, respondents will also be provided with a toll-free telephone number as an alternate mode of access. The use of a phone-in option for completion will reduce burden for participants with limited internet access. We will reduce the burden on staff who are interviewed by identifying relevant staff prior to the site visit,

providing advance copies of the interview topics, and recording and preparing transcripts of the interviews (if interviewees agree) to minimize time needed for potential follow up for clarification.

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

There is no existing data source that can readily be analyzed to document the disaster recovery effectiveness for renter households or disaster recovery outcomes of renter households and rental housing stock in places that received Community Development Block Grant-Disaster Recovery grants. HUD and the Urban Institute are not aware of any other national studies of CDBG-DR focused on efficacy of the programs for supporting rental housing recovery.

Interview and focus group contacts may have been asked to participate in other research studies, but the protocols and information requested are unique to this study.

- 5. If the collection of information impacts small businesses or other small entities describe any methods used to minimize burden.**

There are no small businesses that will be asked to participate in the data collection.

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 is a one-time data collection event, with no repetition of data collection planned. Collecting data directly from CDBG-DR grantee representatives and administrators, elected and appointed officials, CDFI representatives, PHA representatives, property developers and managers, and renter populations is the best and only way to reliably assess disaster recovery outcomes of renter households and rental housing stock in places that received CDBG-DR grants. If the proposed activity is not implemented, the government will have to rely on incomplete or limited information to assess current implementation of the program, and to recommend program or policy improvements.

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

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320.6 (Controlling Paperwork Burdens on the Public – General Information Collection Guidelines). There are no special circumstances that would require this information collection to be conducted in a manner that would be inconsistent with OMB guidelines. The following below are “Not Applicable” to this collection:

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

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**
- Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported.
 - Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.

In accordance with the Paperwork Reduction Act of 1995, HUD published a 60-Day Notice of Proposed Information Collection in the *Federal Register* on July 11, 2023. The docket number was FR-7075-N-04, and the notice appeared on pages 44144-44146. The notice provided a 60-day period for public comments, and comments were due by September 11, 2023; no comments were received.

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

Renter and landlord focus group respondents will be offered a \$50 incentive for participation in a 1.5 hour focus group. Such incentives have been shown to substantially enhance cooperation with data-collection efforts and mitigate risks associated with non-response bias. Based on the research team's prior experience with studies of similar populations, \$50 is high enough to support participation, but not so high that it is overly generous or that participants would feel the token of appreciation is excessive or coercive. To prevent the token of appreciation from being coercive, the project team will give participants who show up to the focus group the incentive upon arrival, regardless of whether an individual ultimately chooses to stay and participate.

There are no payments or gifts to other respondents who will be participating during regular working hours in their professional capacity.

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

The information we collect will be kept private to the extent permitted by law. No personally identifiable information (PII) will be requested from program participants. Names will not be linked to comments or responses. Data will be publicly reported in aggregate form only. Urban will obtain Institutional Review Board (IRB) approval for all data collection under this contract.

The Urban Institute developed, and its IRB approved, a confidentiality pledge. All researchers working with the data will read and sign the confidentiality pledge, agreeing to adhere to the data security procedures laid out in the approved IRB submission. The contractor will safeguard all data, and only authorized users will have access to them. Information gathered for this study will be made available only to researchers authorized to work on the study. Information will not be maintained in a paper or electronic system from which data are directly retrieved by an individuals' personal identifiers.

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

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

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

- Prior to collecting data from all respondents, informed consent will be administered. They will be given a clear overview of the study and its goals, the data security plan, the staff confidentiality agreement, and our methods for safeguarding anonymity in our reports and publications. We will stress the voluntary nature of participation and make clear that there are no negative consequences for those who choose not to participate. This information will be provided in an email letter requesting their participation and in the interview or focus group introduction.
- The research team will safeguard the information gathered. Data gathered will be analyzed and discussed exclusively in the aggregate; no published reports using the data will single out any particular respondent. Information identifying particular respondents will be shared only with staff members who have signed Data Confidentiality Pledges and who need the information for research purposes. All such staff members will sign this pledge. Hard-copy materials containing respondent identifying information will be locked up when not in use, and electronic materials with identifying information will be stored on a secure server in password-protected and/or encrypted files, where appropriate.

All respondents included in the study will be informed that information they provide will be used only for the purpose of this research. The information will not be used by HUD for grantee monitoring.

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.

Survey respondents will not be asked about sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. They will, however, be asked questions about their professional and sometimes personal circumstances, such as, household income, and housing experiences related to disasters. As noted above, all respondents will be informed that participation is voluntary and that they can decline to answer any question without consequence, and that their identity will be kept confidential, with answers only reported in the aggregate.

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 chart below; 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.**

Table 1 demonstrates the projected burden hour estimates for one-time phone and in-person interviews or focus groups. These estimates assume the maximum possible number of study participants. The estimates included in Table A2 are based on estimates for the time needs to complete these data collection activities.

Respondents will total 190 interview and focus group participants from federal, state, and local governments, professional and business services, and private sector employees in three case study communities, to be determined. The average estimated response times are 1 hour for interviews and 1.5 hours for focus groups. This results in an estimated total response burden of 250 hours.

To calculate the total annual cost burden to respondents, the Urban Institute used Occupational Employment Statistics from the U.S. Department of Labor's Bureau of Labor Statistics to identify the median hourly wages (as classified by Standard Occupational Classification, SOC, codes) for potentially relevant occupations for interview and focus group participants. Table A3 demonstrates how the burden hours are calculated. The total annual cost burden to respondents is approximately \$8,335.20.

Table A3: RESPONDENT COST BURDEN

Information collection	Number of respondents	Frequency of response	Responses per annum	Burden hour per response	Annual burden hours	Hourly cost per response	Cost
Interviews – Federal, state, and local government	25	1	25	1	25	\$30.85	\$771.25
Interviews – Professionals and business services	20	1	20	1	20	\$39.64	\$792.80
Interviews – Private sector employees	25	1	25	1	25	\$33.03	\$825.75
Focus groups – Private sector employees	120	1	120	1.5	180	\$33.03	\$5,945.40
Total	190	-	-	-	250	-	\$8,335.20

Source: Average hourly and weekly earnings of all employees on private nonfarm payrolls by industry sector, seasonally adjusted. U.S. Bureau of Labor Statistics.

- 13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information (do not include the cost of any hour burden shown in Items 12 and 14).**
- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;**
 - **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

- **generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

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

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

The total cost to the government for this study is \$699,607 over a 3-year period. Federal staff will not have involvement in data collection and there is no annualized cost to the government beyond the contract amount. Included are costs associated with background research, evaluation design, development of data collection instruments, secondary and administrative data collection and analysis not covered by this request, qualitative data collection activities, analysis, and reporting.

The data collection is being carried out under a HUD cooperative agreement with the Urban Institute. The estimated total cost for the qualitative research activities covered under this approval are approximately \$69,559, including \$2,400 for incentive payments, \$15,147 for travel and 366 labor hours for researchers conducting the data collection. The data collection costs are one-time costs based on the competitively bid and awarded cooperative agreement for this study.

- 15. Explain the reasons for any program changes or adjustments reported in Items 13 and 14 of the Supporting Statement.**

This is a new request and does not result from any program changes or adjustments. This submission is a new request for approval; there is no change in burden.

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

Case study finalization will begin immediately following OMB approval, with interviews and focus groups occurring shortly thereafter. During the 16-week data collection period, Urban will conduct outreach and prepare for data collection and then conduct 1-week long site visits to each study community as well as follow up with virtual interviews as needed. At the end of the data collection period, Urban Institute will develop clean note files of all interviews and focus groups to prepare for analysis. Following completion of the document review and qualitative data collection,

Urban will analyze qualitative data to identify within-case- and cross-case findings. Qualitative data will be coded the NVivo qualitative analysis software package using a deductive coding framework developed from the RQs and complemented through inductive coding of emergent themes. From this coding process, Urban will identify key findings and themes that will be integrated with the other analyses.

Data from the national landscape analysis, local market analysis, CDBD-DR analysis and qualitative data collection (the latter being the subject of this request) will be analyzed, integrated, and summarized in a final retrospective report and a policy brief that synthesizes cross-cutting and unique findings and recommends actionable, policy-relevant opportunities to improve renter outcomes in post-disaster contexts.

A project timeline with activities covered in this request is found in table A4.

Table A4: PROJECT TIMELINE

Task	Start Date	End Date
Research Design – Case study sample selection	OMB approval date	3 months after OMB approval
Data Collection – Site visits, interviews, focus groups	3-6 months after OMB approval	12 months after OMB approval
Data Analysis – Qualitative data	1-2 months after start of site visits	6 months after end of site visits
Final Retrospective Reports	6 months after end of data analysis	12 months after end of data analysis

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

The expiration date for OMB approval will be displayed on all forms completed as part of the data collection.

18. Explain each exception to the certification statement identified in item 19.

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