

**Supporting Statement for Paperwork Reduction Act Submissions**  
**Moving to Work, Asset Building Cohort Evaluation**  
**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.**

The Office of Policy Development and Research (PD&R) at the U. S. Department of Housing and Urban Development (HUD) contracted with MEF Associates, with subcontractor Abt Associates, to develop the Research Design and Data Collection and Analysis Plan for an evaluation of the Moving to Work Expansion Asset Building Cohort. As required under the Paperwork Reduction Act, HUD seeks approval from the Office of Management and Budget (OMB) for data collection instruments for the evaluation.

Moving to Work (MTW) is a HUD demonstration that encourages selected PHAs to test ways to increase the cost effectiveness of federal housing programs, encourage greater self-sufficiency of households receiving housing assistance, and increase housing choice for low-income families. MTW designation gives PHAs relief from some regulations and laws that apply to Housing Choice Voucher (HCV) and public housing programs. The Consolidated Appropriations Act of 2016 authorized HUD to award MTW authority to 100 additional PHAs by September 2023, and required that new MTW agencies be selected in cohorts with a specific policy focus.<sup>1</sup> The Asset Building Cohort will test two types of asset building programs for HUD households, rent reporting for credit building and an opt-out savings account program. The ABC has 17 PHAs. Of these 17 PHAs, 9 PHAs will implement an opt-out savings program, six PHAs will implement reporting rent payments to credit agencies, and two PHAs have unique asset building programs. The evaluation of the ABC will include these three components:

- 1) Program Implementation Study
- 2) Impact Studies:
  - a. Rent Reporting for Credit Building Study
    - i. Quantitative study of impact on credit scores
    - ii. Qualitative study of family experiences with rent reporting
  - b. Opt-Out Savings Account Study
    - i. Household survey

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<sup>1</sup> Additional information about the MTW Expansion is available at:  
[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/mtw/expansion](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/expansion).

The Information Collection Request (ICR) for the Evaluation of the Moving to Work Expansion Asset Building Cohort is being submitted to OMB in two phases. The first phase covers data collection during the launch phase of the program. The second phase covers follow-up data collection. The asset building programs are planned to start in October of 2023 and to end in October of 2025. This Supporting Statement requests clearance for the first phase of data collection. A second ICR will be submitted in time for the follow-up data collection anticipated to take place in late 2025 and early 2026. Exhibit A-1 depicts the sequencing of data collection for the Evaluation of the MTW Expansion Asset Building Cohort.

**Exhibit A-1. Sequencing of Data Collection for the Evaluation of the MTW Expansion Asset Building Cohort**

<p><b>Phase 1--Program Launch Phase Data Collection</b>  <b>Estimated Timeframe: January 2024-June 2025</b>  Covered by Current Information Request Described in this Supporting Statement A</p>	<p>Phase 2--Follow-up Data Collection  Estimated Time Frame:  June 2025-January 2027  ICR to be submitted in December 2024 (not included in this ICR)</p>
Program Implementation PHA staff interview guide	Program Implementation PHA staff interview guide-follow up
Program Implementation partner staff interview guide	Program Implementation partner staff interview guide-follow-up
Program Implementation resident interview guide	Program Implementation resident interview guide-follow-up
Rent Reporting Informed Consent Form	Rent Reporting qualitative interview guide round 3
Rent Reporting Baseline Information Form	Rent Reporting qualitative interview guide round 4
Rent Reporting Qualitative Interview Guide Round 1	Opt-out Savings Account Household Survey
Rent Reporting Qualitative Interview Guide Round 2	Opt-out Savings Account Advance Letter and Contact Update

The evaluation of the Asset Building Cohort—supported by this information collection request (ICR)—will help HUD determine if asset building programs of the types studied can be effectively implemented by PHAs and if the programs have the potential to positively impact the well-being of HUD-assisted households. 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.).

The ABC PHAs will implement either a rent reporting for credit building program, an opt-out savings account program, or a PHA-designed credit building program. To enable rigorous

evaluation, households will be randomly assigned to participate in the program or to be in the control group. Households assigned to the opt-out savings account program will be automatically enrolled and then informed that they have access to savings that the PHA is depositing into an escrow account for them, which will be a minimum of \$10 a month for two years. The study sample for rent reporting will be drawn from households who volunteer to have their rental payments reported to credit agencies to build credit. To rigorously study the impact of rent reporting, volunteers will be randomly assigned to a treatment group for whom rental payments are reported or a control group for whom such reporting does not occur. The rent reporting study will include a longitudinal panel of families who will participate in qualitative, in-depth interviews to provide insight into how they understand and experience rent reporting for credit building.

Exhibit A-2 displays the evaluation study components and corresponding research questions.

<b>Exhibit A-2: Study Components and Research Questions</b>	
<b>Study Component</b>	<b>Research Questions</b>
<b>Implementation Study</b>	<ul style="list-style-type: none"> <li>• What services did PHAs plan to deliver, and how were the programs implemented over time?</li> <li>• To what extent did the PHAs succeed in engaging participants in services as intended?</li> <li>• What local factors may have affected the outcomes of treatment and control group members?</li> <li>• Who did and did not participate in the asset building programs?</li> <li>• What did it cost the PHA to set up and run each asset building program?</li> <li>• What lessons did the PHAs learn?</li> <li>• What lessons did participants learn?</li> </ul>
<b>Impact Studies:</b> <b>(1) Rent reporting for credit building</b> <ul style="list-style-type: none"> <li>a. <b>Quantitative study of impact on credit scores</b></li> <li>b. <b>Qualitative study of family experiences with rent reporting</b></li> </ul> <b>(2) Opt-out Savings Account program</b> <ul style="list-style-type: none"> <li>a. <b>Household survey</b></li> </ul>	<ul style="list-style-type: none"> <li>• What is the impact of the opt-out savings program on assisted households' ability to build and maintain an emergency savings fund that helps them avoid material hardships?</li> <li>• What is the impact on ability to use traditional financial products and decrease reliance on high-cost alternative financial products?</li> <li>• What is the impact of the rent reporting program on the credit profiles of assisted households?</li> <li>• How do families understand the rent reporting for credit building program in the context of their financial situations?</li> <li>• How do their understandings of their credit reports and scores change over time and do they believe that</li> </ul>

	participation in the rent reporting program changed their financial situation or financial management?
<b>Rent Reporting Simulation (Optional Task)</b>	<ul style="list-style-type: none"> <li>• How would the credit scores of families who didn't volunteer to participate in the rent reporting program have been affected if they had had their rental payments reported to credit agencies?</li> </ul>

To answer the research questions, the evaluation will collect data from multiple sources, including:

- Administrative Data
  - Credit agency data to measure credit scores
  - HUD administrative data to describe household income and demographics
  - PHA data to enable random selection of households for the study samples
- Program Data
  - Program documents to describe program implementation and outreach to households
  - Program data to describe program implementation, such as how many households participated, how much money was deposited by the PHA into the opt-out savings account, and how much the PHA paid to the partner organizations
- Primary Data
  - Program implementation interviews with PHA staff (n=51)
  - Program implementation interviews with staff of partner organizations (n=12)
  - Program implementation interviews with HUD-assisted residents (n = 10)
  - Baseline information form for Rent Reporting study participants (n= 300)
  - Informed consent form for Rent Reporting study participants (n= 300)
  - Interviews for Rent Reporting Qualitative study round 1 (n = 40)
  - Interview for Rent Reporting Qualitative study round 2 (n=40)

The data collection activities covered under this ICR are expected to begin in January 2024 and continue through June 2025; phase two of the data collection is expected to begin in June 2025 and continue through January 2027.

**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 collection. HUD will learn about the implementation of two types of asset building programs—rent reporting for credit building and opt-savings accounts-- and if these programs make a meaningful difference in the lives of HUD-assisted households. Exhibit A-3 describes the data collection in detail.

## **Interviews with PHA Staff, Partner Organization Staff, and HUD-Assisted Residents**

The research team will interview staff about program implementation at all 17ABC PHAs. At each PHA, researchers will interview 1 to 3 PHA staff involved in the asset building program, such as the Executive Director and the Service Coordinator. Each interview will take approximately 1 hour. The research team will select 4 PHAs for in-depth case studies, including 2 that are implementing an opt-out savings account and 2 that are implementing rent reporting. At these 4 PHAs, researchers will interview PHA staff (1-3) and partner organization staff (1-3). At the 2 that are implementing an opt-out savings program researchers will also interview residents (5). Interviews with partner organization staff and with HUD-assisted residents will take 1 hour.

The research team will use information from the interviews to document program design and implementation. This information will provide answers to research questions listed in Exhibit A-2.

The research team has developed three separate data collection instruments for the PHA interviews:

- Program Implementation PHA staff interview guide
- Program Implementation partner staff interview guide
- Program Implementation PHA resident interview guide

Guides for the follow-up interviews in 2025-2026 will be included in a future PRA submission (see Exhibit A-1).

## **Rent Reporting Informed Consent Form and Baseline Information Form**

Households participating in the rent reporting study will be asked to complete an Informed Consent Form (ICF) and a Baseline Information Form (BIF) prior to random assignment into the treatment or control group. The BIF will provide important information not otherwise available from HUD's administrative data, such as indicators of household financial wellbeing. The ICF will take 15 minutes to complete. The BIF will take 15 minutes to complete.

The research team has developed two data collection instruments for resident enrolment into the rent reporting study:

- Rent Reporting Informed Consent Form
- Rent Reporting Baseline Information Form

## **Rent Reporting Qualitative Interview Guide**

The research team will conduct four rounds of in-depth interviews of PHA residents focused on broader experiences and interactions with banking, credit, and financial institutions. The research team will interview 20 residents each at 2 PHAs implementing rent reporting. The in-depth interviews will take 90 minutes each and the same individuals will be interviewed during each round to create a panel.

The research team has developed data collection instruments for the first two rounds of the rent reporting qualitative interviews with families:

- Rent Reporting Qualitative Interview Guide Round 1
- Rent Reporting Qualitative Interview Guide Round 2

Guides for the third and fourth round of qualitative interviews will be included in a future PRA submission (see Exhibit A-1).

**Exhibit A-3: Justification for Data Collection Activities**

<b>Year / Group and Mode</b>	<b>Respondents, Content, and Justification for Inclusion</b>
<p><b>Program Implementation PHA staff interview guide</b></p>	<p><b>Respondents:</b> Approximately 51 PHA staff interviewees across all 17 PHAs in the Asset Building Cohort.</p> <p><b>Topics:</b></p> <ul style="list-style-type: none"> <li>• How was the service model implemented?</li> <li>• What were PHA experiences during startup of the asset building programs?</li> <li>• What services were delivered?</li> <li>• What, if any, other services were delivered as part of the program?</li> <li>• How did implementation of each service model differ among the PHAs offering it?</li> <li>• How closely did implementation of the programs adhere to the PHAs’ original plans?</li> <li>• What, if any, barriers did PHAs face to implementing the programs as they intended to?</li> <li>• To what extent did the PHAs succeed in engaging participants in services as intended</li> <li>• What strategies were used to encourage engagement?</li> <li>• What lessons did PHAs learn about administrative burdens?</li> <li>• What lessons did PHAs learn about the timing of program activities?</li> <li>• What lessons did PHAs learn about required staffing levels?</li> <li>• How much did it cost the PHA to start up and run the asset building program?</li> <li>• What lessons did PHAs learn about the types of interactions with participants to be prepared for?</li> </ul> <p><b>Justification:</b> The research team will interview PHA staff to understand how they implemented their MTW asset building program. This will allow researchers to determine whether such programs are scalable, what supports PHAs need to successfully implement a program, and what challenges they might face in serving HUD-assisted residents. This information is not accessible through existing records and will allow HUD to evaluate the potential of these approaches to have positive impacts on HUD-assisted families. Information on program implementation will be</p>

Year / Group and Mode	Respondents, Content, and Justification for Inclusion
	valuable for other PHAs considering whether to implement an asset building program.
<p><b>Program Implementation partner staff interview guide</b></p>	<p><b>Respondents:</b> Approximately 12 partner organization staff interviewees across the 4 PHAs (2 opt-out savings sites and 2 rent reporting sites) in the Asset Building Cohort chosen for site visits</p> <p><b>Topics:</b></p> <ul style="list-style-type: none"> <li>• What is the partner’s role in the opt-out saving/rent reporting program?</li> <li>• What has the partner done as part of the program?</li> <li>• What agreements, MOUs, or contracts are in place?</li> <li>• How much did the partner organization charge the PHA (if anything)?</li> <li>• What led the partner to want to be part of the program?</li> <li>• Have partners had any direct interaction with residents, and if so what have those interactions involved?</li> <li>• What challenges have partners faced in their role in the program? What has worked well?</li> </ul> <p><b>Justification:</b> PHAs plan to implement their rent reporting or automatic savings programs in collaboration with banks, credit counselors and other non-profit organizations. Since these partner organizations are implicated in the success and scalability of the studied interventions, researchers need to understand how these relationships are managed and whether they can be replicated elsewhere. This information is not accessible through existing records and will allow HUD to evaluate the potential of public-private partnership in asset building programs for HUD-assisted households.</p>

Year / Group and Mode	Respondents, Content, and Justification for Inclusion
<p><b>Program Implementation PHA resident interview guide</b></p>	<p><b>Respondents:</b> Approximately 10 HUD-assisted residents at 2 PHAs (2 opt-out savings sites )</p> <p><b>Topics:</b></p> <ul style="list-style-type: none"> <li>• To what extent were participants aware of and to what extent did they understand the services available to them?</li> <li>• What motivated their participation?</li> <li>• How did participants perceive the services they received? What difference did they perceive the program(s) made in their lives and on their financial well-being?</li> <li>• Did participant attitudes about financial institutions or credit reporting (e.g., lack of trust in banks, concerns with reporting of information to credit agencies) affect their decisions on whether to engage with program services?</li> <li>• How did different backgrounds among the participants affect their experiences with the program?</li> <li>• What are the financial circumstances and well-being of the households served by the PHAs?</li> <li>• What lessons did participants learn about building savings and about navigating the banking system (Opt-Out Savings Accounts)?</li> <li>• What lessons did participants learn about obstacles to and opportunities for building credit? (Rent Reporting)?</li> </ul> <p><b>Justification:</b> The research team will interview HUD-assisted residents participating in the rent reporting and opt-out savings programs to understand their characteristics and experiences. This will allow researchers to determine whether the programs are properly targeted and what additional support residents may need. This information is not accessible through existing records and will allow HUD to evaluate the potential of asset-building programs for HUD-assisted households.</p>



Year / Group and Mode	Respondents, Content, and Justification for Inclusion
<p><b>Rent Reporting Qualitative interview guide round 1</b></p>	<p><b>Respondents:</b> Approximately 20 HUD-assisted resident interviewees at each of two PHAs (2 rent reporting sites selected for site visits)</p> <p><b>Topics:</b></p> <ul style="list-style-type: none"> <li>• What are the financial circumstances and well-being of the households served by the PHAs?</li> <li>• What motivated their choice to enroll in the study?</li> <li>• How do study participants perceive their financial situations (and credit in particular)? <ul style="list-style-type: none"> <li>○ What is study participants’ current understanding of their credit status?</li> </ul> </li> <li>• What factors do study participants identify as affecting their financial situation and credit scores?</li> <li>• What are study participants’ goals and aspirations that may be affected by their financial situation or credit score? <ul style="list-style-type: none"> <li>○ How have credit and their financial situations affected study participants’ abilities to pursue their goals?</li> </ul> </li> <li>• What types of recent services have study participants received that may help their financial situation? <ul style="list-style-type: none"> <li>○ For treatment group members, the focus will in part be experiences with the rent reporting initiative.</li> </ul> </li> </ul> <p><b>Justification:</b> The research team will interview HUD-assisted residents participating in the rent reporting study to understand their characteristics and experiences. This will allow researchers to determine whether the programs are properly targeted and what additional support they may have to provide participants to generate the desired impacts. It will also provide a better understanding of the context including services already available in these communities and families’ own understanding of credit. This information is not accessible through existing records and will allow HUD to evaluate the potential of asset-building programs to positively impact HUD-assisted households.</p>

Year / Group and Mode	Respondents, Content, and Justification for Inclusion
<p><b>Rent Reporting Qualitative interview guide round 2</b></p>	<p><b>Respondents:</b> Approximately 200 HUD-assisted resident interviewees at each of two PHAs (2 rent reporting sites selected for site visits)</p> <p><b>Topics:</b></p> <ul style="list-style-type: none"> <li>• How do study participants perceive their financial situations (and credit in particular)?</li> <li>• How has this changed since the first interview?</li> <li>• What is study participants’ current understanding of their credit status?</li> <li>• What factors do study participants identify as affecting their financial situation and credit scores? (Deeper probes on factors such as medical or school debt, emergency needs, and discrimination.)</li> <li>• What have study participants’ previous experiences been in interacting with the credit system and formal financial institutions?</li> <li>• What have their experiences with alternative financial services been?</li> <li>• What level of trust do study participants have in formal financial systems?</li> <li>• What have study participants’ previous experiences with savings been? What factors have helped or hindered savings?</li> <li>• What assets and supports exist for participants beyond formal financial services?</li> <li>• Update on how do study participants perceive their financial situations (and credit in particular)?</li> <li>• How do study participants perceive their financial situations as impacting their lives?</li> <li>• What needs do study participants have?</li> </ul> <p><b>Justification:</b> The research team will interview HUD-assisted residents participating in the rent reporting study to understand their characteristics and experiences. This will allow researchers to determine whether the programs are properly targeted and what additional support they may have to provide participants to generate the desired impacts. It will also provide a better understanding of the context including services already available in these communities and families’ own understanding of credit. This information is not accessible through existing records and will allow HUD to evaluate the potential of asset-building programs to positively impact HUD-assisted households.</p>
<p><b>Rent Reporting Informed</b></p>	<p><b>Respondents:</b> Up to 300 residents participating in the rent reporting evaluation</p> <p><b>Topics:</b> This form ensures individuals understand the research, how their data will be</p>

Year / Group and Mode	Respondents, Content, and Justification for Inclusion
<b>Consent Form (ICF)</b>	used, steps taken to protect their privacy, and their rights as research participants  <i>Justification:</i> Informed consent is required to conduct research in compliance with the Common Rule
<b>Rent Reporting Baseline Information Form (BIF)</b>	<i>Respondents:</i> Up to 300 residents participating in the rent reporting evaluation  <i>Topics:</i> financial well-being; previous knowledge about issues related to credit  <i>Justification:</i> The BIF will collect data not present in administrative records that will be used to improve the statistical power of the research to identify the impacts of the rent reporting programs

**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.**

In accordance with the E-Government Act of 2002, information technology has been incorporated into the data collection to reduce respondent burden. Electronic mail will be used, whenever possible, to communicate with PHAs, partner staff or residents to request their participation in interviews.

Some interviews with PHA staff and with PHA-assisted residents will be conducted remotely. With participants' permission, interviewers will audio-record all interviews so that the interviewer can fully focus on conducting the interview without pauses or delays for notetaking. Remote interviews will either take place over the phone or using a secure web conferencing platform, depending on the participants' preferences.

**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.**

This evaluation looks at rent reporting for credit building and opt-out savings account programs among HUD-assisted households. MEF Associates conducted a review of literature on asset building programs at PHAs. No studies of these types of programs at PHAs were identified. In fact, as of this writing, no studies of the impact of rent reporting for credit building among residents of subsidized housing of any type have been published. Existing published studies are simulations and therefore do not capture real-world consequences. No studies were identified that look at opt-out savings account programs at PHAs or among any sample of very low-income

households. HUD is not aware of any studies for which this study represents a duplicate research effort.

The research team also reviewed existing sources of secondary data for PHAs, including HUD administrative data and supplemental data MTW agencies are required to submit to HUD, prior to writing the PHA interview protocols. The interviews are designed to capture information that is not otherwise available in these secondary sources.

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

This research will include interviews of PHA staff and staff in partner organizations (banks, non-profits, etc.) engaged in the implementation of financial empowerment programs as part of the Asset Building Cohort. It is possible some may be small entities as defined by OMB Form 83-I. The project team will minimize the burden for all respondents by providing clear guidance on procedures and by requesting only the information required to achieve the study's objective as part of this data collection. There should be no adverse impact for any organizations whose staff participate in these interviews.

**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.**

If the data collection activities described in this statement are not approved, the evaluation of the Asset Building Cohort would rely only on secondary data sources (such as HUD administrative data) to address the research questions. These secondary sources would not be adequate to answer key research questions about the needs of HUD-assisted households, the impact of asset building programs on participants, the successful implementation of asset building programs to serve HUD-assisted households, the scalability of such programs, and resources PHAs need to be successful in these efforts. The data must be collected as described in the statement to provide the Congressionally mandated rigorous evaluation of the MTW Asset Building Cohort.

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

- **requiring respondents to report information to the agency more than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **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;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

- **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; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320.6 (Controlling Paperwork Burden on the Public – General Information Collection Guidelines). As noted below, there are no special circumstances that require deviation from these guidelines.

- **Requiring respondents to report information to the agency more than quarterly:** Respondents are not required to report information more than quarterly.
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it:** Respondents are not required to prepare a written response as part of this data collection effort.
- **Requiring respondents to submit more than an original and two copies of any document:** Respondents are not required to submit any documents as part of this data collection effort.
- **Requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years:** Respondents are not required to retain records as part of this data collection effort.
- **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:** This data collection does not include any statistical data that is not designed to produce valid and reliable results that can be generalized to the universe of study
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB:** This data collection does not involve the use of any statistical data that would not be reviewed and approved by OMB.
- **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:** This data collection does not involve the use of a pledge of confidentiality that would deviate from statute or regulation, be inconsistent with disclosure and data security policies, or be considered as impeding the sharing of data as appropriate.
- **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:** This data collection does not require respondents to submit proprietary trade secrets or confidential information. Any such information would be kept confidential to the extent permitted by law.

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.**

#### 60-Day Notice

The 60-Day Notice of Proposed Information Collection: Evaluation of the Moving to Work (MTW) Expansion Asset Building Cohort, OMB Control No.: 2528–NEW was published on 07/21/2023. Document Citation: 88 FR 47158. Page: 47158-47160. Agency/Docket Number: Docket No. FR-7075-N-07.

#### Consultation with Experts:

The Evaluation of the Asset Building Cohort was developed by HUD's contractors MEF Associates, with subcontractor Abt Associates, Inc. Key members of the MEF and Abt research team include Co-Principal Investigators Sam Elkin and Dr. Larry Buron; Project Manager Dr. Stephen Nuñez; and Economists Dr. Judy Geyer and Dr. Shawn Moulton. MEF and Abt have also engaged Dr. J. Michael Collins of the University of Wisconsin Madison and Michael Lim of TransUnion as consultants on research design and convened an expert panel to review all materials produce as part of the research design report and data collection and analysis plan.

#### Consultation with Stakeholders:

As part of developing the research design for evaluation of the MTW asset building programs, the research team participated in multiple community of practice meetings with the PHAs in the Asset Building Cohort. The research team members were available to answer questions and to listen to input from PHA staff. PHA staff stated that they have the capacity to participate in the evaluation of their asset building programs.

#### Response to Public Feedback:

The research team did not receive any feedback or comments during the 60-day public notice period. The team was, however, contacted by Prof. Andrew Reamer of George Washington

University, who requested copies of the data collection instruments once finalized. The research team plans to send the finalized instruments included in this package.

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

Individuals that enroll in the rent reporting study and fill out the BIF will receive \$10 and a token of appreciation. Residents will receive \$50 as a token of appreciation for participating in the Program Implementation Resident Interview and \$75 for the Rent Reporting Qualitative Interview. The amount proposed is based on research on tokens of appreciation and the study team's experiences with other federal studies. Research has shown the effectiveness of a token of appreciation in increasing study participation of low-income households, such as HUD-assisted households. Based on previous studies, we believe \$50-\$75 is a reasonable amount to incentivize participation in the interviews without being so high as to be coercive.<sup>2</sup>

PHA staff and partner organization staff will receive no payment for participating in interviews or completing surveys.

**10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

HUD will contract with an independent research team to conduct this research. HUD and the research team will make every effort to maintain the privacy of respondents. 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 will be required to have been trained to protect private information and the study will have 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.

Research reports may name specific PHAs or partner organizations that were included in the study, for example, to highlight a unique practice or program. However, individual PHA staff and partner organization staff who participate in interviews will not be named in reports. Respondents will be informed that they will not be named directly in any publications but may be identifiable based on their affiliation with a specific PHA.

PHA residents who participate in interviews for this study will not be named in any reports. In addition, to lessen the chances that a reader familiar with a particular PHA might identify

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<sup>2</sup> Bridget, Kelly, Marjorie Margolis, Lauren McCormack, Patricia LeBaron, and Dhuly Chowdhury. (2017). What Affects People's Willingness to Participate in Qualitative Research? An Experimental Comparison of Five Incentives. *Field Methods*, 29:4, 333-350

resident respondents, the research team may change or omit details if a respondent is quoted or paraphrased.

All respondents included in the interviews will be asked if they consent to participate. They will also be made aware that the information they provide will be used only for research purposes and that individuals will not be named in reports. This will occur as part of an informed consent process approved by the IRB in accord with HUD's status as signatory to the Common Rule.

**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 for PHA and partner organization staff do not contain any sensitive questions. The data collection instruments for HUD-assisted residents (Program Implementation resident interview guide, Rent Reporting qualitative interview guide round 1, and Rent Reporting qualitative interview guide round 2) will ask questions about potentially sensitive topics including material hardship, experiences with financial institutions, and discrimination.

These items are necessary to understand participants' needs, barriers to building credit and savings, and experiences accessing services through the programs that are the focus of the study. The research team will take steps to minimize the discomfort that such questions may pose. Participants will be alerted to the types of questions that might cause discomfort as part of the informed consent process. Staff will inform respondents that participation is voluntary and that they may refuse to answer individual items or choose to stop the interview at any time, including after the interview has started. Study participants will also be reminded that the study team will keep their responses private. When coordinating the interviews, the research team will identify at least one resource (potentially appropriate program staff) to refer participants to for support if they experience emotional strain.

The study also requires collection of SSNs (from HUD-assisted households only, not from program and partner staff) to facilitate matching to other administrative databases to support the key outcomes of this study. Without matching to these administrative data sources, the study would not be able to measure the key outcomes for households—including changes in credit scores and financial well-being—that are the focus of this study.

**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.

Exhibit A-4 presents the estimated annualized respondent burden for this information collection. The burden estimates include PHA staff interviews, partner organization staff interviews, PHA resident interviews, rent reporting consent and baseline information forms, and rent reporting qualitative interviews rounds 1 and 2.

**Exhibit A-4: Estimated Respondents, Burden Hours, and Costs**

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Program Implementation PHA staff interview guide	51	1	.33	1	17	\$57.60	\$979.20
Program Implementation partner staff interview guide	12	1	.33	1	4	\$42.48	\$169.92
Program Implementation resident interview guide	10	1	.33	1	3.33	\$10.31	\$34.37
Rent Reporting Informed Consent Form	300	1	.33	.25	25	\$11.05	\$276.25
Rent Reporting Baseline Information Form	300	1	.33	.25	25	\$11.05	\$276.25
Rent Reporting Qualitative Interview Guide 1	40	1	.6667	1.5	40	\$11.05	\$442.00
Rent Reporting	40	1	.6667	1.5	40	\$11.05	\$442.00

Qualitative Interview Guide 2							
Total burden annualized over 3-year period.							
<p>The average hourly rate for HUD-assisted households is calculated as follows: (1) For the Program Implementation resident interview guide we averaged the minimum wages of all states with a PHA implementing a Savings Account option, which includes California, Florida, Massachusetts, New Hampshire, Ohio, Oregon, and South Carolina, and calculate the average hourly minimum wage as \$10.31. (2) For the interviews that apply only to PHAs in the rent reporting study, we averaged the minimum wages of all states with a PHA in the rent reporting study, which includes Connecticut, Florida, Idaho, Illinois, Maine, and New Hampshire, and calculate the average hourly minimum wage as \$11.05.</p> <p>The average hourly rate for PHA staff (\$57.60) is based on the average employer costs for State and Local Government employees. (Source: Bureau of Labor Statistics, December 2022 Employer Costs for Employee Compensation)</p> <p>The average hourly rate for partner organization staff (\$42.48) is based on the average employer costs for civilian employees. (Source: Bureau of Labor Statistics, December 2022 Employer Costs for Employee Compensation)</p>							

**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 already reflected on the burden worksheet shown in Items 12 and 14).**

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

This data collection effort involves no recordkeeping or reporting costs for respondents other than the time burden to respond to questions during the interview described in item A.12 above.

**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 data collection will be carried out under a HUD contract with Abt Associates. HUD estimates the costs to the Federal government for collection and analysis of the data collected with the instruments submitted with this PRA package to be approximately \$303,297 per year for three years. The professional labor cost estimates for this information collection include project management staff, data analysts, survey methodologists, qualitative interviewers, and IT support staff. The professional labor includes the labor hours to enroll participants into the study, collect the data, and analyze the data collected for the first phase of the study. The labor cost estimates are based only on data collection and analysis tasks for the first phase of the study (see Exhibit A-1). (Estimates do not include data collection for the second phase of the study, nor do the estimates include study tasks such as revising the Research Design and Data Collection and Analysis Plan, monthly reports, biweekly meetings, writing research reports, and presenting findings.) Exhibit A-5 summarizes the cost breakdown per year. Estimated costs reflect the estimated project budget based on the description of data collection and analysis tasks in the project scope of work and current GSA labor rates, Federal per diem allowances for travel, GSA translation\interpretation contracted prices, and standard practice for compensating respondents for research interviews.

**Exhibit A-5: Estimated Costs Per Year**

<b>Activity</b>	<b>Estimated Cost to Federal Government</b>	<b>Total Labor Hours for Information Collection</b>
Professional labor	\$281,819	1,297
Travel	\$ 10,533	N/A
Translation and Transcription	\$9,278	N/A
Household token of appreciation or other direct costs	\$1,667	N/A
Total	\$303,297	N/A

**15. Explain the reasons for any program changes or adjustments reported in Items 12 and 14 of the Supporting Statement.**

This submission to OMB is a new request for approval.

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

The contracted research team will analyze, tabulate, and report the data collected for the Evaluation of the Moving to Work Asset Building Cohort to HUD. Exhibit A-6 presents an overview of the data collection and analysis schedule. This schedule assumes that data collection begins in October 2023.

**Exhibit A-6: Data Collection Timeline**

<b>Month, Day, Year</b>	<b>Activity</b>
October to Dec. 2023	Obtaining Informed Consent Forms and BIF during Study Enrollment
Spring 2024	First round of PHA Interviews with PHA staff, partner organization staff and PHA residents; First Round of Rent Reporting Qualitative Interviews
Fall 2024	Second round of Rent Reporting Qualitative Interviews
Winter 2026	Follow-up Survey for Households in the Opt-out Savings evaluation*
Spring 2026	Follow--up PHA Interviews with PHA staff, partner organization staff, and PHA residents; third round of Rent Reporting Qualitative Interviews*

\* To be included in a separate PRA Package

**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.**

HUD does not seek approval to avoid displaying the expiration date. 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.**

No exceptions are necessary for this information collection.

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**B. Collections of Information Employing Statistical Methods**