

**Supporting Statement for Paperwork Reduction Act Submissions
(Stepped and Tiered Rent Demonstration Evaluation)
(OMB# 2528-0339)**

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.**

Section 239 of the Fiscal Year 2016 Appropriations Act, P.L. 114-113 (2016 MTW Expansion Statute), authorizes HUD to expand the Moving to Work (MTW) demonstration program from the current size of 39 Public Housing Agencies (PHAs) to an additional 100 agencies over a period of 7 years. The Statute directs HUD to add new MTW PHAs in cohorts, with each cohort testing a specific policy change so that HUD can conduct a rigorous evaluation of that policy's effects. 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 H

The second cohort of MTW Expansion PHAs is testing alternative ways of setting rents in the public housing and housing choice voucher programs. The traditional rent policy (the Brooke rent) typically sets each household's rent at 30 percent of their adjusted monthly income. This rent policy is administratively complex and burdensome for PHAs and assisted households. The Brooke rent is hypothesized to be a disincentive for households to increase their earnings, as \$100 dollars of increased income would result in \$30 of increased rent.

In this project—the Stepped and Tiered Rent Demonstration (STRD)—PHAs are implementing alternative rents that might be easier to administer and might incentivize assisted households to increase their earnings. Five PHAs are implementing a stepped rent, under which a household's rent will increase modestly each year regardless of their income. Five PHAs are implementing a tiered rent, under which households are assigned to income-based tiers and rents are set based on the tier. Both policies enable households to increase their income without causing an immediate rent increase. Both policies include hardship provisions to prevent high rent burdens. And both policies include less frequent income reexaminations, to reduce the amount of PHA staff time required to administer the program.

The STRD is being implemented as a randomized controlled trial (RCT); eligible households (limited to non-elderly, non-disabled households) are being randomly assigned to the new rent policy, or to remain on the traditional rent policy. This design is the gold standard for program evaluation and will enable HUD to conclude whether the new rent policies caused any differences observed between the two groups over time. HUD's evaluation is expected to last 6 years.

HUD has contracted with MDRC to carry out the first phase of HUD's evaluation, to launch the STRD and lay the foundation for a long-term evaluation. HUD has also allocated resources to support software modifications required by the PHAs to implement the STRD Demonstration.

This revision of a current, approved information collection proposes to expand on already-approved qualitative interviews with PHA staff with a second round of these interviews, which are necessary for the evaluation. The field research data collection guides for the interviews with PHA staff responsible for implementing the new rent policies are included as Attachments A and B. Each of the interview guides includes slightly different questions, reflecting the different roles played by different staff in the implementation of the rent policies. These interview guides include: Housing Specialist and Property Manager Interview Guide (Attachment A), PHA Managers / Supervisors / Policy Informants Interview Guide (Attachment B). These interviews, to occur in the second year of new policy implementation, will help HUD and MDRC to determine whether each PHA is implementing the new policies with fidelity to the study design, how the policies are implemented and staffed in practice, and qualitatively assess how households respond to PHA communications. The interviews will also provide important information about how the new rent policies affect PHA administrative burden.

This revision of a current, approved information collection request includes the following data collection instruments and attachments:

- Attachment A: Housing Specialist and Property Manager Interview Guide
- Attachment B: PHA Managers/Supervisors/Policy Informants Interview Guide

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 revision of a current, approved information collection; the previous request (which may be found here: https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202204-2528-001) includes 8 instruments that are approved and unchanged by this revision. Those previously approved instruments include four interview guides for PHA staff in different roles; those interviews have been completed and the information collected is being used for reports on study implementation. This proposed revision will add two additional interview guides for PHA staff, to learn about their experience after concluding the launch of the new rent policies.

The information is being used by HUD, HUD's contractor MDRC, and any other HUD contractor that may be tasked with supporting the long-term evaluation of the STRD. The information will be used to continue to assess PHA implementation of the new policies via a second round of qualitative staff interviews. Information that is still being gathered from the current, approved collection is being used to enroll and randomly assign households into the study, to conduct descriptive analyses of the research sample enrolled into the randomized controlled trial, and to assess the implementation of the new rent policies.

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

Wherever possible, advanced technology will be used in data collection efforts to reduce burden on study participants and on site staff. For the interviews with PHA staff, the research team will first seek to conduct data collection in person, recording the interviews for later transcription and analysis. The research team will seek to collect certain information via phone or secure electronic videoconference software (e.g., Zoom for Government), if PHA staff are unavailable for in-person interviews.

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.**

HUD's evaluation of the STRD will rely heavily on existing administrative data, including: data from HUD's Inventory Management System/Public and Indian Housing Information Center (IMS/PIC), PHA 50058 data, the National Directory of New Hires (NDNH), local Continuum of Care (CoC), and state TANF and SNAP data. Qualitative information can only be obtained directly from PHA staff through semi-structured interviews, as proposed in this information collection. These interviews will, for example, help MDRC assess whether each PHA has implemented the new rent policies correctly with fidelity to the RCT design.

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

This information collection will not affect small businesses. It will only affect PHA staff and individual recipients of HUD housing assistance.

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.**

The STRD data collection aims to collect information only as frequently as needed to achieve the aims of the study. Eliminating any proposed data collection items would compromise the evaluation's ability to address key research questions and monitor the implementation of the rent rules. Semi-structured interviews will be conducted with program staff at one point during 2024 or 2025. These interviews will be critical to understand the implementation of each new rent policy and its context.

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

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR § 1320 (Controlling Paperwork Burdens on the Public). There are no special circumstances that require deviation from these guidelines. The following below are **“Not Applicable”** to this collection:

- requiring respondents to report information to the agency more than quarterly – **“Not Applicable”**;
 - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it – **“Not Applicable”**;
 - requiring respondents to submit more than an original and two copies of any document – **“Not Applicable”**;
 - requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years – **“Not Applicable”**;
 - in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study – **“Not Applicable”**;
 - requiring the use of a statistical data classification that has not been reviewed and approved by OMB – **“Not Applicable”**;
 - that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use – **“Not Applicable”**; or
 - requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law – **“Not Applicable”**.
8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**
- **Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported.**
 - **Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.**

In accordance with 5 CFR 1320.8 (Paperwork Reduction Act of 1995), HUD published a 60-Day Notice of Proposed Information Collection in the Federal Register on March 12, 2024 (Docket No. FR-7090-N-04, pages 17862-17864) related to the data collection activities for the Moving to Work Stepped and Tiered Rent Demonstration Evaluation. The notice provided a 60-day period for

public comments, and comments were due May 13, 2024. No comments were received. (See Appendix C for a copy of the Federal Register Notice.)

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

For PHA staff interviews, staff will be asked to participate in data collection as part of each PHA's overall effort to implement the STRD and support the evaluation. Because interview participation represents a minimal burden and will be both voluntary and connected to each respondent's day-to-day job responsibilities, no compensation will be offered.

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.

Because of the nature of the information collected from and about study participants, strict confidentiality procedures will be followed for this evaluation. The information requested under this collection is protected and held confidential in accordance with 5 U.S.C. § 552a (Privacy Act of 1974). As required by 5 U.S.C. 552a (Privacy Act of 1974), HUD published a Systems of Record Notice (SORN) at 87 FR 56080 on 9/13/2022.

Strong confidentiality protections will be implemented to maintain the privacy of respondents in STRD data collection activities, to the extent permitted by law. All interview respondents will be informed that any personal information they provide will be used only for the evaluation and will not be shared with PHAs or HUD in a way that may be used to identify them. Individuals will not be identified in prepared reports. All research staff working on the project will be trained to protect private information and will sign a pledge stating that they will keep all information gathered private to the extent permissible by law. All papers that contain study participant names or other identifying information will be kept in locked areas and any computer documents containing identifying information will be protected with a password.

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.

Questions that are potentially of a sensitive nature are minimized on the data collection tools, which are limited to respondents' roles and responsibilities at the PHA and the experiences implementing the new rent policies. Through a consent process that will be reviewed by MDRC's Institutional Review Board, interview respondents will be informed about the voluntary nature of their participation in interviews and the fact that the responses to individual questions are not required.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices;
- if this request covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I; and
- provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.

Exhibit A. Total Estimated Burden (note: Rows 1 through 8 are unchanged from the previously approved ICR. Rows 9 and 10 are being added with this ICR modification)							
Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Baseline Information Form (household survey)	24,000	1	24,000	.12	2,880	\$9.43	\$27,158.40
Stepped Rent Informed Consent Form	7,000	1	7,000	.18	1,260	\$9.43	\$11,881.80
Tiered Rent Informed Consent Form	17,000	1	17,000	.18	3,060	\$9.43	\$28,855.80
PHA Executive Director Interviews (Round 1)	10	1	10	.75	7.5	\$59.86	\$448.95
PHA Program Director Interviews (Round 1)	20	1	20	1.5	30	\$44.24	\$1,327.20
PHA MTW Coordinator Interviews (Round 1)	10	1	10	.75	7.5	\$44.24	\$331.80
PHA Housing Specialist Interviews (Round 1)	60	1	60	1.5	90	\$25.64	\$2,307.60
Rent Policy Implementation Data Tracking Tool	10	1	10	9	90	\$25.64	\$2,307.60
PHA Managers/ Supervisors/ Policy Informants Interview	40	1	40	1.5	60	46.83 ¹	\$2,809.80

¹ For program staff participating in interviews in Round 2, the estimate uses the mean hourly wages of selected occupations (classified by Standard Occupational Classification (SOC) codes) was sourced from the Occupational Employment Statistics from the U.S. Department of Labor's Bureau of Labor Statistics. Potentially relevant occupations and their median hourly wages are:

Guide (Round 2)							
Housing Specialist and Property Manager Interview Guide (Round 2)	80	1	80	1.5	120	27.00 ³	\$3,240.00
Total	48,230				7,605		\$80,668.95

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.

There will be no cost burden to respondents resultant to the data collection from the PHA staff interviews.

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 federal government for the first phase of STRD, including all information collection efforts in this ICR, is \$5,653,240 over 5 years.

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

This submission is a revision of a currently approved collection which includes 8 instruments that are approved and unchanged by this revision. This proposed revision will add two additional interview guides which increased the number of respondents in Items 12.

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.

Using various data sources, MDRC will develop three reports during Phase 1 of the evaluation. The revised proposed information collection in this document will support the Final Implementation Report only. Note: the below schedule describes the timeline for providing final draft reports to HUD.

Report Schedule	
DELIVERABLE	SCHEDULE
Interim Report 1	10/16/2024
Interim Report 2	9/30/2024
Final Implementation Report	5/15/2025

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

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

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

No exceptions are necessary for this information collection.