

Office of Community Services Affordable Housing and Supportive Services Demonstration Data Collection

**OMB Information Collection Request
0970 - NEW**

Supporting Statement Part A - Justification

February 2024

Type of Request: Emergency

Submitted By:
Office of Community Services
Administration for Children and Families
U.S. Department of Health and Human Services

Summary

The Administration for Children and Families is requesting emergency review and approval of this information collection by OMB, as authorized under [44 U.S.C. 3507](#) (subsection j). The proposed approval process is necessary because the use of normal clearance procedures is reasonably likely to cause a Congressionally ordered deadline to be missed. The information collection is essential to the mission of the agency and will inform a report to Congress within one year after grants were awarded (awarded September 2023), as required through HR 117-403, Departments of Labor, Health and Human Services, and Related Agencies Appropriations Bill, 2023.

1. Circumstances Making the Collection of Information Necessary

In FY23, the Office of Community Services (OCS) is administering a brand-new demonstration program entitled the Affordable Housing and Supportive Services Demonstration. This program was appropriated in HR 117-403, Departments of Labor, Health and Human Services, and Related Agencies Appropriations Bill, 2023 through the Social Services Research Demonstration program (SSRD). The House report language directs the Administration for Children and Families (ACF) to provide a report on the findings of this demonstration within one year after grants are awarded.

The House report language states, “Support Services at Affordable Housing.--The Committee includes \$3,000,000 for a demonstration program to provide funding to owners of affordable housing properties to offer supportive services for their residents, including after-school programs for children and teenagers; education opportunities for youth and adult residents; mental health, alcohol and addiction treatment; self-sufficiency resources; resources on future home ownership; financial literacy training; elderly care; assistance to residents with disabilities; and other community services. The Committee requests a report one year after award of such grants on the findings of this demonstration program.”

OCS awarded grants for the Affordable Housing and Supportive Services Demonstration on September 29, 2023. Given this Congressional directive, OCS has prepared data collection instruments to study the implementation of this demonstration program with the intent to produce a robust report to Congress. Under normal circumstances, OCS would submit the data collection instruments through a full review process to the Office of Management and Budget (OMB) as required by the Paperwork Reduction Act (PRA). However, the short timeframe attached to the Congressional directive makes it reasonably likely that the use of normal clearance procedures to comply with the PRA would cause this Congressional deadline to be missed. If OCS were to proceed with the normal timeline for OMB review and approval, OCS would be unable to collect, clean, analyze, and consolidate program data such that it would be accessible for the report to Congress due within one year. Moreover, this collection is critical to OCS’s mission of alleviating the causes and conditions of poverty for individuals, families, and communities with low incomes. Through program evaluation, OCS will be able to study the implementation of this brand-new program that provides supportive services to families living in affordable housing. The results of this study will not only inform members of Congress and potentially influence future investment but will also

help OCS shape and refine our program model to better serve end beneficiaries. Thus, OCS is requesting emergency OMB approval of this data collection to ensure we can accommodate the Congressional request for a report on the findings of this demonstration within one year.

OCS will submit a request following approval of this emergency request to extend data collection and continue for additional reporting beyond the first 2024 Congressional report.

2. Purpose and Use of the Information Collection

The primary purpose of this collection is to inform a requested report to Congress on the findings of the brand-new Affordable Housing and Supportive Services Demonstration. The report will center around three primary research categories: the implementation of supportive services in an affordable housing context; changes in residents' ability to access needed services; and participants' experiences and self-sufficiency outcomes. OCS hopes to identify which services and combinations of services support residents' mental health, safety, parenting skills, housing stability, and economic mobility. OCS will also use the data collected to inform technical assistance to grant recipients and determine program best practices.

OCS will administer some aspects of the data collection through virtual interviews and electronic surveys. OCS will collect other data with in-person focus groups. The following table provides an overview of the information collection efforts.

<i>Instruments</i>	<i>Respondent, Content, Purpose of Collection</i>	<i>Mode and Duration</i>
Self-Sufficiency Matrix	Respondents: Residents living in affordable housing complexes funded by the AHSSD grant and receiving intensive case-management services. Content: Assessment of need in 18 different domains, on a scale from 1 to 5. Purpose: Determine baseline needs. Assess changes in self-sufficiency caused by wraparound services.	Mode: Survey Duration: 1.5 hours
Service Receipt Questionnaire	Respondents: Residents living in affordable housing complexes funded by the AHSSD grant and receiving intensive case-management services. Content: Two questions on characteristics of the resident (length of time living in the housing complex and number of children) and a yes/no checklist about different services that the resident may have received in the last 6 months. Purpose: Evaluate if AHSSD funding increased the number of services that residents accessed.	Mode: Survey Duration: 15 minutes

Resident Focus Group	Respondents: Residents living in affordable housing complexes funded by AHSSD grant. Content: Seven questions (with optional probes for more detail) regarding which services the residents used, what they found most helpful, what the role of the caseworker was, and how their families and neighbors have changed since the grant began. Purpose: Understand the experiences of residents in the program, including what benefits families identify and what aspects of the program are viewed as most critical to driving positive change.	Mode: Focus group Duration: 1.5 hours
Quarterly PPR Collections	Respondents: Grant recipient staff. Content: Narrative report on accomplishments and challenges experienced by the grant recipients. Purpose: Allow OCS program specialists to provide technical assistance to grant recipients. Support understanding of implementation best practices.	Mode: Written report Duration: 2 hours
Semi Annual Report MANDATORY	Respondents: Grant recipient staff. Content: Count of the direct services that the grant recipient provided using AHSSD funds, count of referrals of residents to other services, characteristics of the housing complex, list of partner organizations that the grant recipient worked with, and aggregate demographics of residents who received AHSSD-funded services. Purpose: Understand what AHSSD funds were used for and who was served by the grant.	Mode: Written report Duration: 3 hours
Semi Annual Report OPTIONAL	Respondents: Grant recipient staff. Content: Count of events that the grant recipient hosted. Count of safety, stability, well-being, and economic mobility outcomes, with options for grant recipients to submit additional outcomes that they are tracking. Purpose: Provide a space for grant recipients to offer details about outcomes produced by their programs that would not otherwise be collected.	Mode: Written report. Duration: 1 hour
Interviews with Program Directors	Respondents: Grant recipient program directors directly involved in planning or implementing the AHSSD program. Content: Background of respondent, context of implementation, implementation details, and perceived	Mode: Interview Duration: 1.5 hours

	outcomes of the program. Purpose: Understand the design and implementation of the program, to develop implementation best practices.	
Interviews with Caseworkers	Respondents: Grant recipient caseworkers who provided services to residents. Content: Background of respondent, implementation of services, and perceived outcomes. Purpose: Understand the implementation and perceived benefits of the program from the staff perspective.	Mode: Interview Duration: 1 hour

Beneficiary-level data will be used to determine how the program changed residents' level of access to services and what outcomes were achieved by strengthening service delivery. Data from program staff will be used to understand implementation of the program. OCS will collect and analyze all data, and then use the findings to write the requested report to Congress. The first report will be submitted in time to meet the September 2024 Congressionally ordered timeline. OCS also plans to submit an additional report in spring of 2025 with final conclusions on the program. The following request to extend approval will include more information about this continued data collection and reporting.

3. Use of Improved Information Technology and Burden Reduction

OCS will make use of virtual platforms to reduce collection burden. OCS will use Microsoft Teams to conduct virtual interviews. With participant consent, OCS will record interviews to ensure all responses are captured, eliminating any need to revisit questions due to inaccurate note taking. OCS will use Survey Monkey, a virtual survey platform, to administer two instruments – Instrument 1: Self-Sufficiency Matrix (only for two grant recipients not currently using the matrix) and Instrument 2: Service Receipt Questionnaire. Survey Monkey will allow for the instruments to be administered on any mobile device in addition to a laptop or desktop computer, which will aid in survey dissemination. Once responses are submitted via Survey Monkey, OCS will automatically have access to the data, eliminating any potential data submission burden on grant recipients or partners.

4. Efforts to Identify Duplication and Use of Similar Information

OCS plans to use the Arizona Self-Sufficiency Matrix as one of our instruments for quantitative collection. This is a widely used and validated tool to assess changes in overall participant self-sufficiency across a variety of indicators. OCS polled our nine grant recipients, and seven out of nine are currently using or have used the Arizona Self-Sufficiency Matrix to assess their clients. Therefore, OCS is essentially eliminating any duplication of efforts by collecting data via the same instrument that the majority of the grant recipients are already using.

Furthermore, the Mandatory Semi-Annual Report is based on the existing CSBG reporting structure that the grant recipients are performing. Generally, the CSBG reporting structure

captures a broad array of grant recipient activities and outcomes, as CSBG is a very flexible funding stream. However, all grant recipients have indicated that the current CSBG reporting structure would not accurately capture their specific work on the AHSSD grant. Thus, to make reporting easier on AHSSD grant recipients, OCS has modified and refined the traditional CSBG reporting structure so as to only collect information on residents who are directly receiving services through the AHSSD grant and has added a section on referrals. All of the grant recipients have management information systems (MIS) designed to collection most of the information included in this report. OCS is thus reducing the burden of creating a new data collection system on the grant recipients while directly discerning how AHSSD funds are being spent to increase access for residents.

5. Impact on Small Businesses or Other Small Entities

Not applicable. The grant recipients for the Affordable Housing and Supportive Services Demonstration are non-profit community action agencies.

6. Consequences of Collecting the Information Less Frequently

If the collection is not conducted, OCS risks failing to meet the request of the report to Congress about the findings of the Affordable Housing and Supportive Services Demonstration. This collection is crucial to OCS understanding the implementation and impact of this brand-new program, and ultimately informing Congressional leaders on implementation and impact of these funds in vulnerable communities.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances for this information collection.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

In accordance with the PRA of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an expedited OMB review of this information collection activity. This notice, published on January 16, 2024 (89 FR 2623) alerted the public to a request for emergency approval for six months of data collection and provided a thirty-day comment period. During this comment period, we did not received comments. Following initial approval, a full request will be submitted to continue data collection beyond six months. This extension request will include two comment periods, as required by the PRA. A full request will document any comments received and how ACF has considered the comments.

9. Explanation of Any Payment or Gift to Respondents

OCS plans to offer a \$25 gift card each time a participant completes the Arizona Self-Sufficiency Matrix and a \$50 gift card for focus group participants as tokens of appreciation. We hope the gift cards will yield a high response rate across both administrations of the

Matrix. While the majority of the grant recipients are using the Matrix, many of the recipients are not administering the Matrix as regularly as requested in this evaluation. OCS also believes that by offering tokens of appreciation for the Matrix and focus groups, we will receive higher quality data, as participants will be more likely to answer thoughtfully and completely. A Cochrane systematic review and meta-analysis (Brueton et al., 2013) found that offering monetary tokens of appreciation improves the retention and response rate to questionnaires and Stanley et al. (2020) found that monetary tokens of appreciation increase completion rates of surveys.

In addition to improving response rates and data quality, the proposed monetary tokens of appreciation for participants is intended to acknowledge their efforts and to account for potential incidental costs incurred as part of participating in the collection (i.e., childcare costs while an individual is meeting with their caseworker to complete the Matrix). OCS recognizes that families with low incomes are often weighed down by administrative burden to receive needed services. In their health policy brief, Herd and Moynihan (2020) summarize how burdensome processes to access social safety net programs cause feelings of lost autonomy, perceived stigma, poor program uptake, and stress-associated health issues. By offering tokens of appreciation, OCS will help address some of these issues while meaningfully recognizing the contributions of residents to the evaluation process.

10. Assurance of Confidentiality Provided to Respondents

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private to the extent permitted by law. OCS complies with all Federal and Departmental regulations for private information. Any data stored electronically will be secured in accordance with the most current National Institute of Standards and Technology (NIST) requirements and other applicable Federal and Departmental regulations.

11. Justification for Sensitive Questions

The Arizona Self-Sufficiency Matrix has some questions that may be considered sensitive, particularly around mental health and substance use. OCS would like to keep those questions within the matrix, as it is a validated tool, and we do not want to alter it such that it loses some of the established validity. Also, OCS does not plan to collect any personally identifiable information, so any sensitive information collected will either come to OCS in aggregate or de-identified using a unique identifier. The majority of grant recipients are also using this tool, and OCS has included in the Matrix instructions (Attachment D) that individuals can choose to skip any question in the Matrix that they do not wish to answer.

12. Estimates of Annualized Burden Hours and Costs

Estimated Burden Hours

Burden has been estimated for each information collection using the following assumptions:

- **Self-Sufficiency Matrix:** Direct beneficiaries living in the residential housing communities and receiving intensive case management will respond to the Matrix. Based on the grant applications, OCS anticipates that approximately 700 individuals will receive intensive case management. OCS anticipates an overall response rate of 80% (see Supporting Statement B) and has used this response rate to calculate burden estimates. Respondents will complete the matrix twice within the 12-month timeframe of the study. Each response is estimated to take about 1.5 hours. The majority of the grant recipients are currently using this Matrix, although on different time intervals.
- **Service Receipt Questionnaire:** The Questionnaire will be administered alongside the Matrix, to the same group of residents who are completing the Matrix. The Questionnaire will be completed twice and will take approximately 15 minutes. OCS anticipates that approximately 700 individuals will receive intensive case management and be eligible to complete the Questionnaire. OCS anticipates an overall response rate of 80% (see Supporting Statement B) and has used this response rate to calculate burden estimates.
- **Resident Focus Groups:** OCS plans to conduct focus groups at around half of the affordable housing sites. Each focus group will include between 5-7 individuals. The focus groups will take approximately 1.5 hours.
- **Quarterly PPR Collections:** The grant recipients will fill out a narrative PPR each quarter, for a total of 4 quarters.
- **Semi Annual Report Mandatory:** The Mandatory version of the Semi Annual Report will be filled out by all grant recipients twice. All recipients indicated that they are currently tracking most of the metrics in this report. OCS estimates that it will take around 3 hours for each recipient to compile the metrics into a single report.
- **Semi Annual Report Optional:** Grant recipients have the option to complete some or all of this Semi Annual Report up to 2 times. The metrics in this report are based on indicators that some of the grant recipients stated in their applications that they plan to track. For the purposes of this burden calculation, OCS is estimating that grant recipients will spend 1 hour on the report per response. OCS anticipates that only a third of grant recipients will fill out this report (see Supporting Statement B) and has used this anticipated response rate for the burden estimate.
- **Interviews with Program Directors:** OCS is planning to interview an average of 2 directors per site. This will be a one-time interview. OCS estimates that the interviews will take around 1.5 hours.
- **Interviews with Caseworkers:** OCS is planning to interview an average of 2 caseworkers per site. This will be a one-time interview. OCS estimates that the interviews will take around 1 hour.

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total/Annual Burden Hours	Average Hourly Wage	Total Cost
Self-Sufficiency Matrix	560	2	1.5	1680	\$7.25	\$12,180.00
Service Receipt Questionnaire	560	2	.25	280	\$7.25	\$2,030.00
Resident Focus Group	25	1	1.5	37.5	\$7.25	\$271.88.00
Quarterly PPR Collections	9	4	2	72	\$45.48	\$3,274.56
Semi Annual Report MANDATORY	9	2	3	54	\$45.48	\$2,455.92
Semi Annual Report OPTIONAL	3	2	1	6	\$45.48	\$272.88
Interviews with Program Directors	18	1	1.5	27	\$76.26	\$2,059.02
Interviews with Caseworkers	18	1	1	18	\$54.50	\$981.00
Estimated Annual Burden Total:				2174.5	Estimated Annual Cost Total:	\$23,525.26

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) wage data from May 2022. To account for fringe benefits and overhead the rate was multiplied by two which is \$36.76. <https://www.bls.gov/oes/current/oes211093.htm>

Rationales

- For self-sufficiency matrix, service receipt questionnaire, and focus groups, using the federal minimum wage level (\$7.25).
- For quarterly PPRs and semi-annual reports, using “community and social service specialists” (21-1099) median wage rate of \$22.74. To account for fringe benefits and overhead the rate was multiplied by two which is \$45.48.
- For interviews with program directors, using “social and community service managers” (11-9151) median wage rate of \$38.13. To account for fringe benefits and overhead the rate was multiplied by two which is \$76.26.
- For interviews with caseworkers, using “social workers” (21-1021) median wage rate of \$27.25. To account for fringe benefits and overhead the rate was multiplied by two which is \$54.50.

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no other costs to respondents and record keepers.

14. Annualized Cost to the Federal Government

The total cost for the data collection activities under this current request will be \$43,000. This sum reflects federal staff time to send out the survey instruments, complete interviews, administer data collection, and analyze data. The average salary of the staff working on this program is a GS12, which is compensated at an average wage rate of \$89,834 annually, \$43 hourly. It is anticipated that federal staff will spend about 1,000 hours on this project.

15. Explanation for Program Changes or Adjustments

This is a new information collection.

16. Plans for Tabulation and Publication and Project Time Schedule

Data collection will begin after OMB approval. It is anticipated that data collection will take twelve months. Data analysis will take about six weeks. Analyzed data will be used to inform a robust report to Congress, per the house report language requesting a report within one year of program implementation.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

OCS will not seek approval to not display the expiration date for OMB approval.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.

References

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