Supporting Statement for Paperwork Reduction Act Renewal Submission
Evaluation of the HUD-DOJ Pay for Success Re-Entry Permanent Supportive Housing Demonstration
OMB # 2528-0319

Part 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.**

In 2016, the U.S. Departments of Housing and Urban Development (HUD) and the Department of Justice (DOJ) entered into an innovative interagency collaboration that combines DOJ's mission to promote safer communities by focusing on the reentry population with HUD's mission to end chronic homelessness. This collaboration resulted in the Pay for Success Permanent Supportive Housing Demonstration, with $8.68M awarded in June 2016 to seven communities to develop permanent supportive housing (PSH) for persons cycling between the jail or prison systems using Pay for Success (PFS) as a funding mechanism. The PFS Demonstration grant supports activities throughout the PFS lifecycle. In January 2017, HUD awarded the evaluation contract to the Urban Institute, to assess whether PFS is a viable model for scaling supportive housing to improve outcomes for a re-entry population. The overarching goal of this formative evaluation is to learn how the PFS model is implemented in diverse settings with different structures, populations, and community contexts. Throughout the evaluation, two data collection instruments (Annual Partnership Survey and Time Use Survey) have been used to collect information regarding the implementation of the PFS PSH demonstration directly from staff at demonstration partner agencies in each of the study sites. The first OMB approval was in October 2018, the second approval was in 2021, and now the third approval is sought this year.

This information collection renewal request includes: (1) the HUD-DOJ PFS Key Project Partners Annual Web-based Partnership Survey (referred to as the Partnership Survey), which is focused on the development and functioning of partnerships and community-level collaborations that may benefit the target population, and (2) the HUD-DOJ PFS Key Project Partners Quarterly Time Use Survey (referred to as the Time Use Survey), which is being conducted as part of a study of the staff time that is used to develop each PFS project, through the phases of its PFS life cycle of feasibility analysis, transaction structuring, and project implementation. The authority to collect information is in Sections 501 and 502 of the Housing and Urban Development Act of 1970 (Public Law 91-609) (12 U.S.C. §§ 1701z-1; 1701z-2(d) and (g)). Please see Appendix A for the relevant section of HUD's statutory authority.

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 data collection is part of the ongoing national evaluation, managed by the Office of Policy Development and Research (PD&R) at HUD, which is designed to help HUD and DOJ assess whether PFS is a viable model for scaling supportive housing to improve outcomes for a re-entry population. The Urban Institute has used the information collected to document and assess how the PFS model is implemented in diverse settings with different structures, populations, and community contexts across the demonstration sites. The Urban Institute has analyzed and presented their findings in four reports documenting the sites' progress implementing the demonstration and used the data collected to explain each site's experience in terms of implementing the PFS model and the time spent. HUD has published the completed reports to share the initial and interim findings with members of the public, organizations, and communities that are interested in PFS, PSH, and helping individuals returning from jails and prisons to obtain in stable housing and avoid reincarceration.

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.**

Both the Partnership and Time Use Survey data collection can both be completed online or via email without ever having to print anything.

<u>Partnership Survey</u>

The survey is administered online using Qualtrics survey software. Stakeholders will be contacted by email and invited to take the survey. An online survey was determined to be the most cost-effective method of collecting responses from the community of stakeholders. The survey is designed to be completed online accessible through multiple platforms, such as computer, tablet, and smart phone; a PDF version will be available for download for informational purposes only. No respondent or potential respondent has indicated challenges accessing or completing past surveys due to technical barriers.

Stakeholders will be contacted by email and invited to take the survey using an individualized link. This advance mailing will offer information in large font for individuals with visual impairments and notify individuals with disabilities that they may request reasonable accommodations in order to participate in the study. The Section 508-compliant web survey will offer an alternative to the phone survey for individuals with hearing impairments.

The advance mailer will also detail language assistance options for persons with limited English proficiency. The research team will make the survey available in other languages, as needed, for persons with limited English proficiency. Survey language needs will be determined before the survey is administered so that survey translations can be made available to individuals with limited English proficiency (LEP). In prior waves, the research team did not find any need any individuals in the survey population of stakeholders for the initiative. If LEP needs are discovered, translation services will be engaged to make the survey available in other languages, as needed. HUD's Office of Policy Development and Research has a translation services contractor that can help provide translation services if needed.

<u>Time Use Survey</u>

The first wave of quarterly data collection was conducted via phone interview. When many respondents indicated they would prefer to respond via email, the Urban Institute offered respondents a choice in future waves of phone interview or email. Almost all respondents continue to select the email option.

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.

Both the Partnership Survey and Time Use Survey are collecting information that is new and original. Existing data is neither accessible nor attainable since this HUD-DOJ Demonstration is new and has never been implemented before.

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

<u>Partnership Survey</u>
This collection of information will affect 4 of the 7 PFS grantees that are still active in the demonstration and their partners, including local/state government agencies, non-profits, and financial organizations. The Urban Institute minimizes burden on these entities by providing clear and concise information on the purpose of our data collection via email, and by conducting all the data collection online via Qualtrics, accessible through multiple platforms, such as computer, tablet, and smart phone.

The survey has been designed to minimize respondent burden; the Partnership Survey pre-testing showed it takes respondents approximately 20 minutes to complete.

<u>Time Use Survey</u>

To reduce the organizational burden of the quarterly data collection, only one person from each organization identified will be contacted to provide hours spent by organization staff.

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 the burden.**

HUD and DOJ entered into an innovative interagency collaboration that resulted in the Pay for Success Permanent Supportive Housing Demonstration with $8.68M awarded to seven grantees in June 2016. If the proposed data were not collected or not collected as frequently, then HUD and DOJ would not be able meet the evaluation objectives: (1) to learn how the PFS model is implemented in diverse settings with different structures, populations, and community contexts and (2) to assess whether PFS is a viable model for scaling supportive housing to improve outcomes for a re-entry population.

Since HUD executed a contract modification with the Urban Institute in early 2024, the data collection timeline for the Demonstration Evaluation has been extended through February 2026. Failure to conduct the final waves of the Partnership Survey and Time Use Survey in Years 8 (2025) and 9 (2026) would yield incomplete data for summary findings in the remaining final comprehensive report.

<u>Partnership Survey</u>

The Partnership Survey is administered annually, for the duration of the evaluation. There is no other comprehensive source for this information. This component of the evaluation is necessary to understand the impact of collaboration among the participating organizations and how those partnerships change over time. Without the partnership and community change information obtained from this survey, HUD would not know the benefits of funding permanent supportive housing through a PFS framework. Administering this survey less frequently would affect the reliability of the data.

<u>Time Use Survey</u>

The only current time data on PFS implementation comes from submissions to HUD’s DRGR system, for billing purposes. This system does not capture on every demonstration organization that is part of the PFS planning and implementation work. There is no current source of data concerning time use beyond the staff time that is billed to the HUD award. This component of the evaluation is necessary to understand the additional time costs of PFS beyond what is covered by DRGR reporting. Without this information, HUD will not know about the additional costs of funding permanent supportive housing through a PFS framework. Collecting information less frequently would reduce the reliability of the data.

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.

- Under this ICR, HUD will not conduct any data collection requiring respondents to report information to the agency more often than quarterly;
- Under this ICR, HUD will not conduct any data collection requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- Under this ICR, HUD will not conduct any data collection requiring respondents to submit more than an original and two copies of any document;
- Under this ICR, HUD will not conduct any data collection requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- Under this ICR, HUD will not conduct any data collection in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- Under this ICR, HUD will not conduct any data collection requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- Under this ICR, HUD will not conduct any data collection 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
- Under this ICR, HUD will not conduct any data collection requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the 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.**

The language of the 60-day notice is included in this package and was published on June 8, 2024, ending on August 27, 2024, on pages 54029-54030. The notice period has ended, and no comments were received.

Grantees were consulted during the research design process to obtain feedback on the proposed data collection to reduce burden on grantees and increase clarity of instructions.

Partnership Survey

The Partnership Survey tested survey questions that were adapted from other survey efforts. The survey was tested with 8 respondents representing 4 different sites (Lane County, OR; Austin, TX; Alaska; Los Angeles, CA), and 4 different PFS roles (government, service provider, evaluator, TA provider) across sites to ensure clarity of instructions and data elements to be reported. Feedback on formatting and content was solicited from all testers via e-mail and by phone call. Based on tester feedback, changes were made, including: the addition of a progress bar, removal of ambiguity about when the survey is asking about the PFS project or the broader community, and the addition of questions about benefits of data infrastructure and sustainability.

Time Use Survey

Pre-tests of the two previously proposed methods, a text-message-based survey and the email alternative, initially indicated that neither would achieve an acceptable response rate. In response, we proposed to replace that data collection with quarterly interviews of key informants, to be combined with the use of administrative data. After conducting the first wave of quarterly interviews, respondents requested the option to reply via email. We adjusted our method to offer both methods and to-date the email option has been by far the most often selected mode.

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

No incentives, or other payments or gifts, will be offered to survey or interview participants.

10. Describe any assurance of confidentiality provided to respondents and the basis for the 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.

Before beginning any survey or interview, stakeholders were provided an explanation of the purpose of the evaluation and how their responses will be used. Respondents will be told that their individual responses will be de-identified and will be publicly reported only in the aggregate. However, they will also be told that unique roles or responses could be potentially identifying, and therefore we are not promising confidentiality.

The survey research instruments and interview protocols – specifically the Partnership Survey, and the Time Use Survey email template – were reviewed and approved by the Urban Institute's Institutional Review Board prior to initiating any research, which operates according to the Common Rule on the Protection of Human Subjects found in Title 45 of the Code of Federal

Regulations, Part 46 (45 CFR 46). This IRB review has been renewed annually. The information requested under this collection is protected and held private in accordance with 5 U.S.C.552 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act of 1974) and OMB Circular No. A-130. A Privacy Impact Assessment was approved by the Department on 11/17//2017. There is no data linkage between one data set and another to learn more about an individual so there is no system of records notice (SORN).

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 people from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature have been included.

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.**

Partnership Survey
The Partnership Survey will be administered annually to approximately 65 people in management or leadership roles in partner organizations participating in the PFS Demonstration.

The surveys were originally pilot tested with 8 respondents to improve the survey instrument. We asked respondents to record their start and stop time to gauge the appropriateness of our burden estimates. Respondents reported the web-based Partnership Survey took less than 15 minutes, and timing in Qualtrics showed the average was 13 minutes. Therefore, the estimate of the burden is based on a maximum of 0.33 hours (20 minutes) to complete, and the estimated annual burden for the Partnership Survey is 21.67 hours per year.

Time Use Survey

Quarterly data collection will be conducted four times per year, to approximately 17 respondents in supervisory or administrative positions in partner organization participating in the PFS Demonstration. Estimate of the burden is based on 1 hour to respond to the emailed request or to complete an interview, and the estimated annual burden for the Time Use Survey is 68 hours.

Based on the below assumptions and tables, we calculate the annual burden hours for these study activities in aggregate to be 84.25 hours and the annual cost to be $2,742.34 as broken down in detail by respondent type, burden, and wages below.

Based on the expectation that the typical key project partner role is either a management or support role, we estimated their cost per response using the average of the most recent (May 2023) Bureau of Labor Statistics, Occupational Employment Statistics median hourly wages for the labor categories "social and community services manager" and "community and social service specialist, all other."

Estimated Annual Hour and Cost Burden of Information Collection

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hours Per Response	Annual Burden Hours	Hourly Cost Per Response[1]	Annual Cost
HUD-DOJ PFS Key Project Partners (Annual Web-based Partnership Survey)	65	1	65	.33	21.67	$32.55	$528.94
HUD-DOJ PFS Key Project Partners (Quarterly Time Use Survey)	17	4	68	1.00	68.00	$32.55	$2,213.40
Total	82	-	-	-	84.25	-	$2,742.34

Source: Bureau of Labor Statistics, Occupational Employment Statistics (May 2023), https://www.bls.gov/oes/current/oes_stru.htm

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HUD-DOJ PFS Key Project Partners	Social and Community Services Manager Community and Social Service Specialist, All Other	11-9151 21-1099	$ 40.10 $ 25.00	$32.55

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.**

There are no additional total annual cost burdens to respondents or record-keepers beyond the labor cost of burden-hours described in item 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 estimated cost to the federal government for these data collection efforts the Evaluation of the Pay for Success Permanent Supportive Housing Demonstration totals $32,184.04 over the 24-month period following the expiration of the current OMB approval. The data collection costs are based on the competitively bid and awarded contract for this study.

Estimated Annual Cost to the Federal Government

Labor			
IDIQ Labor Category	Estimated task Hours	Hourly Rate	Total Cost
Research/Policy Associate	40	$127.35	$5,094
Senior Associate	16	$184.27	$2,948.32
Principal Associate	16	$210.29	$3,364.64
Research Analyst	64	$91.99	$5,887.36
Research/Policy Assistant	48	$71.07	$3,411.36
Editorial	6.3	$115.72	$729.04
Administrative	56	$115.72	$6,480.32
Other Direct Costs			
Computer Network Services			$4,159
Books/Periodicals/Library Services			$14
Reproduction @ $.095/page			$27
Telephone Expenses			$41
Postage/Delivery			$14
Supplies and Miscellaneous			$14
Total Expenses:			$32,184.04

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

Since the last OMB package submission, there has been attrition in sites actively participating in the Demonstration – reduced from six to four sites. This shift has decreased the total number of eligible respondents across sites for both the Partnership Survey and the Time Use Survey.

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

<u>Partnership Survey</u>

After receiving our original OMB approval, the Urban Institute has conducted the Partnership Survey on an annual basis, from January 2018 through March 2024. This renewal application requests approval for these activities through February 2026.

During the survey fielding period, progress on survey administration will be reported bi-monthly to HUD. A summary will be provided upon survey completion with tables of frequencies for all survey questions.

Results from the Partnership Survey are included in the Years 4 and 5 Evaluation Report, which is currently undergoing HUD clearance and will be made publicly available. Results were also included in the Year 3 Evaluation Report, which is already public. Additional results, including looking at change over time will be presented in the remaining annual reports and comprehensive final report, along with descriptive statistics and correlations. Crosstabs of survey responses by organization type and respondent role will also be produced.

<u>Time Use Survey</u>

The Urban Institute will conduct the Time Use Survey data collection on a quarterly basis from the time of this renewal to the conclusion of the demonstration.

The Urban Institute will analyze the data annually and summarize the Time Use Survey costs of each PFS phase as projects move through feasibility analysis, transaction structuring, and implementation. By combining information from actual grant spending from DRGR with time estimates from staff informants and any information about additional funding, we will develop descriptions of the overall time spent. The research team will break this down by partner organizations and by site, how many people at what level are involved in working on each PFS project, and what portion of PFS project time is and is not covered by the HUD grant. In addition, a description will be included of these time costs by PFS phase. Because different Demonstration sites' grants cover different PFS phases, data from different sites will be involved in the estimates for the different phases.

Time use results have been included in the Years 4 and 5 Evaluation Report, which is currently undergoing HUD clearance and will be made publicly available. Additional results, including looking at change over time, will be presented in the final report, along with analyses of survey responses by organization type and respondent role.

Findings will be discussed in annual reports and briefs and considered in relation to findings across other research objectives. Since receiving our original OMB approval, we have included Time Use Survey findings in three annual reports and in briefings to HUD and DOJ project leadership. After this renewal, we will include Time Use Survey findings in the remaining annual reports and comprehensive final report, and in a final briefing at the end of the Demonstration.

17. If you are 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 topics of the certification statement identified in Certification for Paperwork Reduction Act Submissions.

No exceptions are necessary for this information collection.