#### Supporting Statement for Paperwork Reduction Act Submissions Evaluation of Emergency Housing Voucher (EHV) Program (OMB# 2528-new)

#### A. Justification

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

This new collection, sponsored by the U.S. Department of Housing and Urban Development (HUD), seeks to examine the implementation and outcomes associated with the Emergency Housing Voucher (EHV) program, which was created under the American Rescue Plan Act (ARPA) of 2021, in response to the COVID-19 pandemic. The EHV program awarded roughly 70,000 new Housing Choice Vouchers (HCV) to 611 public housing agencies (PHA) that were targeted to households experiencing or at-risk of experiencing homelessness. The collection aims to explore the structure of the EHV program compared to its analogous program, the Housing Choice Voucher program (HCV). Additionally, the evaluation will examine unique features of the EHV program, e.g., the partnerships formed between Public Housing Agencies (PHAs) and Continuums of Care (CoCs), and program features such as the use of administrative fees and waivers to assist program beneficiaries.

In this context, HUD contracted with Social Policy Research Associates (SPR) and its subcontractor, Abt Global (Abt) ("the research team"), to evaluate the EHV program and collect data from three sources: 1) administrative data, 2) a national web survey of PHAs and CoCs, and 3) follow-up telephone interviews with a selected sample of PHAs, CoCs, and other PHA partner organizations in 25 communities. The evaluation will use a mixed-methods approach with administrative data and web survey data to measure outcomes in key interest areas. The follow-up telephone interviews will collect information on the experiences of program staff in implementing the EHV program.

Data from this evaluation will help guide any future emergency housing voucher programs and could also inform possible changes to the HCV program to serve households who are experiencing or at risk of experiencing homelessness. The authority to collect this information is in Sections 501 and 502 of the Housing and Urban Development Act of 1970 (Public Law 91-609) (12 USC §§ 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 is a new information collection. HUD will use the information collected to understand how communities implemented the EHV Program and the outcomes of the program. The evaluation of the EHV program will use qualitative and quantitative methods to address the following research objectives:

- A. Document how PHAs and CoCs structured and implemented their EHV programs, including the extent to which each of the four populations eligible for EHVs were served by the program and how the CoC prioritized EHV receipt among people currently or recently experiencing homelessness;
- B. Learn how PHAs applied administrative fees and chose among and implemented alternative program features and gaining the perspective of PHAs regarding their value;
- C. Detail the extent to which PHAs and CoCs considered and incorporated equity principles and approaches into their EHV programs, including the prioritization of households who most needed housing and incorporating people with lived experience of homelessness to inform the CoC's prioritization strategy; and
- D. Describe the households that were referred to the PHAs and issued EHVs and their success rates and compare them and their success rates to households using HCVs.

The research study intends to explore the following research questions in detail:

- 1) Partnerships Established Between PHAs and CoCs: One of the primary objectives of the study is to examine the partnerships established between PHAs and CoCs as a result of the EHV program. This will include analyzing the nature of these partnerships, the level of collaboration between the two organizations, and how they worked together to meet the housing needs of the program's primary audience.
- 2) Referrals and Eligibility Assessments Administered by Partners: The study will also examine the referral and eligibility assessment processes that partners involved in the EHV program followed. This will involve analyzing the criteria used to determine eligibility, the referral process, and how these processes were streamlined to ensure that households in need could access the program's benefits as quickly as possible.
- 3) Practices in Helping Households During the Lease-Up Process: Another key area of inquiry will be to identify the best practices for helping households during the lease-up process and in securing a housing unit. This will include analyzing the types of support provided to households during this process, the challenges faced by households during this process, and how these challenges were addressed.

4) Administrative Fee Waiver and Its Role in the Program: Finally, the study will seek to understand administrative fee waivers and their role in the program. This will involve analyzing the criteria used to determine eligibility for the fee waiver, the benefits it provided to households, and how it has helped to make the EHV program more accessible to those in need.

The collection will also gather information to guide future efforts developed by HUD. The following questions will be used to collect this information:

- a. What aspects of EHV should be carried over to the regular HCV program or future allocations of emergency vouchers?
- b. What strategies were adopted by communities to monitor program implementation?
- c. Are there any ongoing local evaluations of the EHV program that the community is aware of?

This submission requests OMB approval for the following data collection activities:

- A web survey for PHA staff (see Appendix B)
- A web survey for CoC staff (see Appendix C)
- Phone/virtual interviews with PHA staff (see Appendix D)
- Phone/virtual interviews with CoCs and non-CoC partner organization staff (see Appendix E)

Additionally, this submission contains outreach materials that will be used to support the data collection activities outlined above:

- Outreach materials for a web survey for PHA staff (see Appendix F)
- Outreach materials for a web survey for CoC staff (see Appendix G)
- Outreach materials for phone/virtual interviews with PHA staff (see Appendix H)
- Outreach materials for phone/virtual interviews with CoCs and non-CoC partner organization staff (see Appendix I)

Appendix J contains a copy of the published 60-Day Federal Register Notice.

#### Information Collection Request Overview

In total, HUD plans to conduct a web survey of all of 611 PHAs that received an allocation of EHVs, a web survey of 371 CoCs, 25 telephone/virtual interviews with PHAs, and 25 telephone/virtual interviews with CoCs or other partner organizations.

This Information Collection Request (ICR) includes data collection instruments to collect information from PHAs and CoCs staff.

Both the PHA web survey and the CoC web survey will be fielded electronically using Forsta (formerly called Confirmit), a secure online survey platform.

- For the **PHA web survey (Appendix B)**, the respondents' sample is limited to the 611 PHAs who received EHV funding since the program's enactment. The survey will take approximately 30 minutes to complete, in addition to 5 minutes spent reading outreach materials (Appendix F).
- For the **CoC web survey (Appendix C)**, the respondents' sample is limited to the 371 CoCs that PHAs partnered with to implement the EHV program. This survey will gather information on how these organizations partnered with the PHAs as part of their community's strategy to address and end homelessness. The response times for CoCs will vary. CoCs that worked with more than one PHA will have a longer response time than those who partnered with just one PHA. While 114 CoCs partnered with only one PHA, the remaining 257 CoCs partnered with two or more PHAs (this is because CoCs sometimes cover a larger geographic area than PHAs). CoCs can fill out up to five subsections of the survey per PHA, with each subsection averaging about 15 minutes to complete. CoCs with two to five PHA partners will be instructed to fill out the PHA subsection of the survey for each of their partners. CoCs with more than five PHA partners will be instructed to fill out the PHA subsection of the survey for only five of their partners (the three largest PHAs and up to two that they select). Thus, the maximum response time for a CoC will be 90 minutes.

The **follow-up telephone interview** sample is limited to 25 communities in which both the PHA and partner CoC completed the web-survey. From this universe, the research team will purposefully select 25 communities to represent a variety of program strategies, contexts, and implementation experiences. The research team will conduct two separate interviews in each community: one with 1-2 PHA administrators and one with 1-2 CoC or other partner organization administrators.

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.

Throughout the information collection, the contractor will seek to minimize any burden on the public.

The **web surveys** will be offered using computer-assisted survey technology to reduce respondent burden and to ease the completion of the survey. The sub-contractor will program the surveys in Forsta (formerly known as Confirmit), a research technology platform. Using Forsta, the survey can be easily administered online. The web instrument allows respondents to complete the survey at a convenient time without the risk of losing a paper survey questionnaire.

If respondents cannot complete the survey in one sitting, they may save their place in the survey and return to the questionnaire at another time. The survey automatically skips to the next appropriate question based on respondents' answers, reducing missing data.

Respondents will receive an email from HUD leadership providing information about the evaluation, which will display the OMB control number and other required PRA language. A separate introductory email will provide a URL to complete the survey online (Appendices B and C). The email will offer information on how to take the PHA and CoC surveys over the phone for individuals with visual impairments. Additionally, the web survey will be available in English and Spanish.

The research team will conduct 50 **follow-up telephone interviews** by telephone or using an online teleconference platform across 25 selected communities (two interviews will be done in each community). Interviews will be conducted with approximately 50 representatives from a PHA (25 interviews with two staff people on each call), 40 representatives from a CoC (20 interviews with two staff people on each call), and 10 representatives from a non-CoC partner of the PHA, such as a Victim Service Provider (VSP) (five interviews with two staff people on each call). This will total 50 interviews that will include up to 100 respondents. These interviews will allow the research team to capture information needed to understand different EHV implementation experiences and to probe more about findings from the administrative data and web-surveys. Respondents will be allowed to skip any question they cannot or do not want to respond to, and interviewers will adhere to 90 minutes for each PHA interview and one hour for each CoC or other partner interview. With the respondents' permission, the research team will audiorecord the interviews to minimize the time needed for potential follow-up for clarification and to support interview transcription.

Following Section 508 procedures, the research team will provide reasonable accommodations for individuals with disabilities. For the web-based survey, individuals can elect to participate in the web-based survey with a live person over the phone. For the phone interviews, the research team will provide closed captioning and/or a sign language interpreter for anyone requesting such accommodations. HUD and the research team welcome and are prepared to receive calls from individuals who are deaf or hard of hearing, as well as individuals with speech or communication disabilities. When telephoning prospective participants, the research team will ask if participants need a reasonable accommodation or language access service. HUD and the research team will use translation services as needed for individuals with Limited English Proficiency. If prospective participants require information to be presented in an accessible format, reasonable accommodations, or language assistance to participate in this study, they will be invited to contact [INSERT STAFF CONTACT], the [TITLE/ROLE], by phone at (XXX) XXX-XXXX or by email at [INSERT EMAIL ADDRESS].

# 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 is unaware of any other studies for which this study represents a duplicate research effort. PHAs first implemented the EHV program in 2021 and no national studies of its implementation or outcomes have been conducted. No other data source, either public or private, has been identified that provides the information available from these data collections. No similar information is available at the national, regional, or local level that

could be used or modified for the purposes described.

The data collection instruments were designed so that no two instruments collect the same information, even when addressing the same research question. Respondents may be asked the same questions to capture different knowledge and perspectives.

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

The information collection mentioned here will not significantly impact small entities. Representatives from small entities and service providers may be asked to participate in surveys or interviews, but participation is voluntary. The surveys will be conducted via the web and will take between 30 and 90 minutes to complete. Participants will be able to skip questions and save the survey to return to at a later time. The interviews will be conducted through telephone or virtual communication to capture the necessary information to understand the EHV program's outcomes. The interviews will last between 60 to 90 minutes depending on the type of respondent. Respondents will have the option to skip any question they cannot or do not wish to answer.

# 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 survey and phone interviews are both one-time data collection events, with no repetition of data collection planned. The survey and interviews will only take place once with each respondent. The proposed data collection activities aim to provide the government with evidence on the EHV program's outcomes and the lessons learned from its implementation. If the proposed activity is not implemented, the government will have to rely on incomplete or limited information to recommend program or policy improvements for the existing Housing Choice Voucher program or for any future emergency housing programs.

# 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.

Following 5 CFR § 1320.8 (Paperwork Reduction Act of 1995), a Notice of Proposed Information Collection for publication in the Federal register has been prepared to announce the agency's intention to request an OMB review of data collection activities for the Evaluation of the Emergency Housing Voucher Program. HUD published a 60-Day Notice of Proposed Information Collection in the Federal Register on May 20, 2024 (Volume 89, No. 98, pp. 43869 to 43870). The notice provided a 60-day period for public comments, and comments were due on July 19, 2024. No comments were received. A copy of the published 60-Day Federal Register Notice is included as Appendix J.

The Evaluation of the Emergency Housing Voucher Program was developed and is being implemented with the assistance of Social Policy Research Associates (SPR), the study's contractor. Key members of the SPR's team include Project Director Anne Paprocki; Co-Principal Investigator Christian Geckeler, and Statistical Task Lead Colleen Bullock; and the study's subcontractor Abt Global and its representatives, Lauren Dunton, Co-Principal Investigator, and Judy Geyer, Administrative Data Lead.

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

Respondents will not receive any form of compensation for their time spent participating in this evaluation.

# **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 has entered into a contract with SPR, an independent research firm, and its subcontractor, Abt Global, to conduct this research effort. HUD and SPR will make every effort to maintain the privacy of respondents to the extent permitted by law. 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.

Additionally, individuals and the names of organizations will not be cited as sources of information in prepared reports. Administrative and survey data will be publicly reported in aggregate form only. Quotations or examples from the follow-up telephone interviews may be used in the presentation of findings, but they will be anonymized. The contractor will safeguard all data, and only authorized users will have access to them. Information gathered for this study will be made available only to researchers authorized to work on the study. Information will not be maintained in a paper or electronic system from which data are directly retrieved by individuals' personal identifiers.

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.

No sensitive questions will be asked as part of this evaluation. However, before starting the survey or a follow-up telephone interview, respondents will be informed that their identities and their work affiliation will be kept private and that they do not have to answer any question that makes them uncomfortable.

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

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

Table 1 shows the projected burden hour estimates for data collection for the web survey and qualitative interviews with PHA and CoC staff. These estimates assume the maximum possible number of study participants. The estimates included in **Table 1** are based on the time needed to complete these data collection activities. The total annual cost burden to respondents is approximately \$51,324.11.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Cost
Web survey for PHA staff	611	1	611	.50	305.50	\$59.90	\$18,299.45
Web survey for CoC staff	371	1	371	.87	322.77	\$59.90	\$19,333.92
Phone/Virtual Interviews with PHA staff	50	1	50	1.50	75.00	\$59.90	\$4,492.50
Phone/Virtual Interviews with CoCs and non-CoC partner organization staff	50	1	50	1.00	50.00	\$59.90	\$2,995.00
Outreach materials for web survey for PHA staff	611	1	611	0.08	48.88	\$59.90	\$2,927.91
Outreach materials for web survey for CoC staff	371	1	371	0.08	29.68	\$59.90	\$1,777.83
Outreach materials for phone/virtual interviews with PHA staff	50	1	50	.25	12.50	\$59.90	\$748.75

Table 1: Estimated Hour and Cost Burden of Information Collection

Outreach materials for phone/virtual interviews with CoCs and non-CoC partner organization staff	50	1	50	.25	12.50	\$59.90	\$748.75
Total	2,164		2,164		856.83		\$51,324.11

For the web survey for PHA staff **(Appendix B),** we assume that the hourly compensation cost is \$59.90. We calculated the hourly rate using the average compensation cost for state and local government employees (BLS, 2023)<sup>1</sup>. We expect to reach 611 respondents and administer a survey for 0.50 hours (30 minutes). The total cost for this evaluation item would be \$18,299.45.

Concerning the web survey for CoC staff **(Appendix C)**, the hourly rate for a CoC respondent is also \$59.90. Given that the estimated cost for this item will depend on the number of PHAs working with CoCs and the survey is the same across subgroups, we used a weighted to average to estimate the duration of this survey.<sup>2</sup> We expect to reach 371 respondents, who will spend, on average, .87 hours (52 minutes) completing the web survey, with a total cost of \$19,333.92.

For the phone/virtual Interviews with PHA staff **(Appendix D)**, we expect to interview 50 individuals (two each across 25 interviews) for approximately 90 minutes. The total cost would be \$4,492.50.

For the phone/virtual interviews with CoCs and non-CoC partner organization staff **(Appendix E),** we expect to interview 50 respondents (two each across 25 interviews) for 60 minutes. The total cost would be \$2,995.00.

For the outreach materials for a web survey for PHA staff **(Appendix F)**, we assume that the hourly compensation cost is \$59.90. We expect to reach 611 respondents, who are expected to spend approximately five minutes (.08 hours) of time reviewing these outreach materials. The total cost for this evaluation item would be \$2,927.91.

For the outreach materials for a web survey for CoC staff **(Appendix G)**, we assume that the hourly compensation cost is \$59.90. We expect to reach 371 respondents, who are expected to spend approximately five minutes (.08 hours) of time reviewing these outreach materials. The total cost for this evaluation item would be \$1,777.83.

For the outreach materials for phone/virtual Interviews with PHA staff **(Appendix H)**, we assume that the hourly compensation cost is \$59.90. We expect to reach 50 respondents, who are expected to spend .25 hours (15 minutes) reading a recruitment email about the

<sup>&</sup>lt;sup>1</sup> Bureau of Labor Statistics (2023) <u>State and local government workers by occupational and industry group - 2023</u> <u>Q03 Results (bls.gov)</u>

<sup>&</sup>lt;sup>2</sup> Weights are based on the number of CoCs working with PHAs, i.e., CoCs working with one PHA (114), 2 PHAs (102), 3 PHAs (70), 4 PHAs (37), and 5 or more PHAs (37).

Weighted average = [.50(114)+.75(102)+1.02(70)+1.25(37)+1.50(48)]/(114+102+70+37+48) = .87 hour

interview, scheduling the interview via email, and reviewing a brief study description document. The total cost for this evaluation item would be \$748.75.

For the outreach materials for phone/virtual interviews with CoCs and non-CoC partner organization staff **(Appendix I)**, we assume that the hourly compensation cost is \$59.90. We expect to reach 50 respondents, who are expected to spend .25 hours (15 minutes) reading a recruitment email about the interview, scheduling the interview via email, and reviewing a brief study description document. The total cost for this evaluation item would be \$748.75.

- 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 on the data collection instruments described in item 12 above. There is no known additional cost burden to the respondents.

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

This data collection for the EHV Evaluation is being carried out under a HUD contract with SPR and its subcontractor, Abt Global. The estimated cost to the Federal government for this data collection totals \$725,846. The cost of the data collection to the Federal government is based on the contractor's and subcontractor's labor hours to a) administer a national web survey and interviews for the study and b) conduct data analysis and report final findings. This includes research design and project management (for example, drafting the Research Design, Data Collection, and Analysis Plan and preparing this PRA package), data collection (conducting the web surveys and interviews), and data analysis and reporting across data collection methods.

The data collection costs are one-time costs based on the awarded contract for this study. Refer to Table 2 for a breakdown of the estimated annualized cost to the Federal government.

Activity	Number of Labor Hours	Estimated Cost to Federal Government
Research Design and Project Management	1,888	\$229,064
Data Collection	1,341	\$195,509
Data Analysis and Reporting	2,146	\$301,273
TOTAL	5,375	\$ 725,846

#### **Table 2:** Estimated Cost Breakdown

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

This submission is a new request for approval. There are no changes or adjustments reported in items 12 and 14 of the Supporting Statement.

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 data collected will be analyzed, tabulated, and reported to HUD by the evaluation contractor, SPR, and its subcontractor, Abt Global.

Table 3: I	Evaluation	Schedule
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Task	Description	Timeframe (after OMB approval)
Web Survey administration	Distribution and collection of survey	October 2024 – February 2025
	responses	

PHA/CoC/Other Partner Interviews	Interviews with high-level staff in selected PHAs, CoCs, and Other	After web survey closes– May 2025
	PHA Partners	
Final report	Drafting and dissemination of final	July 2025 - August 2025
	report	

## 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.

Not applicable. The expiration date for OMB approval will be displayed on all forms completed as part of the data collection.

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

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